

Lewisham Local Plan: Statement of Common Ground between London Borough of Lewisham and Historic England

Submission Stage (Regulation 22)

September 2023

1 Introduction

- 1.1 This is a Statement of Common Ground (SoCG) that sets out details of the joint working and cooperation that has taken place, and the future cooperation that is required, between Lewisham Council and Historic England throughout the preparation of Lewisham’s new Local Plan.
- 1.2 To date, Lewisham Council has consulted on:
- the preferred options of the Local Plan through the Regulation 18 consultation during January and April 2021, and
 - the publication draft of the Local Plan through the Regulation 19 consultation during March and April 2023.
- 1.3 At each stage of the plan making process Lewisham Council has prepared a range of evidence base documents and published them on Lewisham Council’s website. These have informed the policies within the new Local Plan. Lewisham Council intends to submit the new Local Plan to the Secretary of State for the purpose of examination in public in late 2023.

2 Relevant Bodies and Strategic Geography

- 2.1 The two relevant parties for the purpose of this SoCG are London Borough of Lewisham and Historic England.
- 2.2 Lewisham Council and Historic England are experienced in partnership working to deliver heritage restoration and an improved historic environment across the Borough.

Lewisham

- 2.3 Sitting in south-east London, Lewisham is an inner London Borough bordered by Boroughs of Bromley, Greenwich and Southwark and the River Thames.
- 2.4 Lewisham has an extremely rich and varied historic environment. It encompasses landscapes, water bodies, parks and open spaces, buildings, urban spaces and the features within them, along with archaeological remains both buried and above ground. The historic environment encapsulates the social and cultural history of Lewisham, its communities and people. This is reflected in the physical fabric of places, the values that people ascribe to them and the traditions and memories associated with them. We are committed to ensuring that the full extent of the significance of heritage assets is understood, both by development industry stakeholders and the wider public, and to properly recognise and protect this significance.



Historic England

- 2.5 Historic England is an expert advisor to the Government and a public body that helps people care for, enjoy and celebrate England’s historic environment by:
- Championing historic places;
 - Identifying and protecting our heritage;
 - Supporting change;
 - Understanding historic places;
 - Providing expertise at the local level.

3 Key Strategic Matters

- 3.1 Lewisham’s new Local Plan seeks to address a number of key strategic matters. Each is considered in turn. The SoCG identifies where there are specific areas of joint working or cooperation. The parties agree to work together through several actions, which are detailed as records of agreement. Where relevant, this SoCG also highlights where agreement on key strategic matters have not, as yet, been reached.
- 3.2 Both parties will continue to communicate in a collaborative manner and engage with each other through 1-2-1 meetings, informal telephone and email correspondence and statutory consultation exercises.

4 Design and Heritage

- 4.1 At the national level, the National Planning Policy Framework requires that local plans should set out a positive strategy for the conservation and enjoyment of the historic environment.
- 4.2 At the regional level, the London Plan recognises the importance of the historic environment, and directs that local plans take a character-led approach to managing growth and development.
- 4.3 Tall buildings play a role in addressing needs for housing across the region and the London Plan directs all London Boroughs to set parameters for buildings heights in their local plans. This includes local definitions of tall buildings and the identification of areas where tall buildings may be an appropriate form of development.
- 4.4 The London View Management Framework (LVMF) (2012) identifies strategic views and landmark features that make a significant contribution to the character of London. The London Plan requires that local plans reflect the LVMF and consider the identification and protection of other locally significant views.

- 4.5 To support the preparation of the new Local Plan, Lewisham Council has prepared and published the Lewisham Characterisation Study (2019), Heritage Assessment Background Paper (2022) and the Tall Buildings Study and Addendum (2021/ 2022).
- 4.6 Whilst being broadly supportive, Historic England’s representations on the Regulation 18 consultation raised concerns about specific site allocation proposals with significant heritage interests, particularly in the Deptford Creekside area. In response to this feedback, Lewisham Council has prepared and published the Heritage Assessment Background Paper (2022). Historic England’s representations on the Regulation 19 consultation no longer raises this as an issue. The Council therefore assumes that the background paper sufficiently meets Historic England’s expectations, in terms of being a robust evidence base to support the plan and that the proposed changes to the site allocations in the Proposed Submission version of the Local Plan are adequate.
- 4.7 Historic England’s representations on the Regulation 19 consultation broadly support the new Local Plan and acknowledge that it provides an effective framework for managing the effects of new development on the historic environment, but also make a number of suggestions to amend the Local Plan. Their main points, and the Council’s response to them, are set out in the table below.

| Key points raised in Historic England’s Regulation 19 representation | LB Lewisham response |
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| <p>As with the previous consultation version of the draft Plan, we note and welcome the focus throughout on the importance of future growth being character-led, as well as the detail on heritage across a broad range of relevant policy areas. We also note and welcome the greater detail and clarity in relation to building heights and locations in this consultation version, together with other amendments to the text in various areas. We consider that as a result the draft Plan offers an effective framework for managing the effects of new development on the historic environment, and our comments on this iteration of the Plan are limited as a result.</p> | <p>The Council notes and welcomes the general comments and support offered by Historic England made in relation to the Spatial Strategy and the framework that it provides for managing the effects of new development on the historic environment</p> |
| <p>In relation to building heights, we welcome the definition of a tall building in the borough, together with maximum heights within identified tall building suitability zones as set out in policy QD4.</p> <p>While we note the text at para 5.33 that such maximum heights are not automatically acceptable within the entire zone, we consider that this should also be made clear within QD4 itself.</p> | <p>The Council welcomes Historic England’s support in relation to the new Local Plan Policy QD 04.</p> <p>The Council also notes the comments made in relation to the wording of new Local Plan Policy QD 04 C, which sets out how the approach to tall new buildings will be applied at different locations across the Borough. The Borough notes the suggestion that the policy may benefit from clarification. The Council acknowledges that this specific issue is addressed within the associated supporting text paragraph (Paragraph 5.33).</p> <p>Action: Consider amending the wording at Policy QD 04 C to reflect the supporting text - <i>Although maximum heights are provided for each for the Tall Building Suitability Zones, proposals will still be expected to include robust design justifications for the heights proposed, including testing in key views.</i></p> |

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| <p>We note that paragraph 8.53 relating to local character in relation to the borough's town centres has been deleted. While this is indeed covered in part elsewhere in the draft Plan, we would suggest that a reference to conserving historic character within town centres either directly in policy EC11 or its supporting text would be useful, not least as these areas often have high potential for significant archaeology. This reference should also make clear that conservation area appraisals and/or management plans should be consulted on relevant proposals.</p> | <p>The Council notes the comments made in relation to the new Local Plan Policy EC 11 and its supporting text.</p> <p>The new Local Plan addresses heritage matters through general borough-wide policies that are set out under Chapter 6 Heritage. These are comprised of Policies HE1 Lewisham's historic environment, HE2 Designated Heritage Assets, and HE3 Non-Designated Heritage Assets. Although these do not explicitly address the conservation of historic character within town centres, they do provide a sound borough-wide approach. Nevertheless, the Council could consider addressing the respondent's comments through modifications to the supporting text – potentially cross-referencing to Chapter 6 Heritage.</p> <p>Action: Consider modifications to the supporting text that refer to the requirements set out under the policies contained in Chapter 6 Heritage.</p> |
| <p>We note the reference to retrofitting measures to existing buildings in policy SD2 and supporting text at paragraph 11.11. We consider it would also be useful to make clear at either point that historic buildings may often need bespoke or non-standard interventions to reduce energy consumption and carbon emissions, as well as signposting current Historic England guidance.</p> | <p>The Council notes the comments made in relation to the new Local Plan Policy SD 2 D-G and its supporting text.</p> <p>The Council acknowledges that designated heritage assets/ listed buildings may need bespoke or non-standard interventions to reduce energy consumption and carbon emissions. The Council considers that this matter is sufficiently addressed through the policy supporting text at Paragraph 11.11.</p> |

4.8 Record of agreement:

A1) Both parties are in agreement that the new Local Plan:

- acknowledges the importance of future growth being character-led;
- provides detail on heritage across a broad range of relevant policy areas;
- provides adequate definition of tall buildings, together with building heights and tall building suitability zones in Policy QD4.

A2) Both parties are in agreement that the following proposed modifications could be made to the new Local Plan:

- amend Policy QD4 C to make reference that maximum heights are provided for each for the Tall Building Suitability Zones, but proposals will still be expected to include robust design justifications for the heights proposed, including testing in key views.
- make a cross reference in Policy EC11 to the heritage policies in Chapter 6 and the need for conserving the historic character of town centres.

4.9 Areas where agreement has not been reached:

A3) At present, both parties have differing opinions regarding the content of Policy SD2 and/or paragraph 11.11.

5 Governance agreements

- 5.1 SoCG need to be prepared and then maintained on an ongoing basis; and be made publicly available to allow transparency. This SoCG is a live document, to be reviewed and updated regularly so that it reflects the most up-to-date position in terms of joint working, especially:
- Whenever agreements on outstanding matters have been reached and where progress in addressing strategic cross boundary matters is achieved, or
 - At each subsequent key stage of the plan making process, as it progresses towards adoption.

6 Signatories

- 6.1 The signatories below confirm that this is an accurate record of the strategic matters requiring cooperation between the London Borough of Lewisham and Historic England. When signing this SoCG:
- The Planning Policy Manager (or equivalent) is the lead Officer responsible for managing the SoCG,
 - The Head / Director of Planning (or equivalent) is responsible for signing off the SoCG.

| Organisation | Name | Position | Signature | Date |
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| London Borough of Lewisham | Nick Fenwick | Director of Planning |  | 11/10/2023 |
| Historic England | Tim Brennan | Historic Environment Planning Adviser |  | 13.9.23 |