



## ENGLISH HERITAGE

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13 April 2010

Dear Matt,

### **London Borough of Lewisham – Local Development Framework Core Strategy Proposed Submission Version, Proposed Changes to the Lewisham UDP Proposals Map, and Sustainability Appraisal**

Thank you for consulting English Heritage on the Core Strategy Proposed Submission Version (the Report), the Proposed Changes to the UDP Proposals Map and the related Sustainability Appraisal (SA). As the government's advisor on all matters relating to the historic environment and a statutory consultee in respect of the Strategic Environmental Assessment of plans, we are pleased to remain involved in the production of this important document for the London Borough of Lewisham.

Based upon the information provided our opinion is that the Core Strategy is **unsound** for the following reasons:

- A lack of robust up to date evidence that demonstrates a clear understanding of the historic environment to support the Core Strategy and the SA (PPS5 and SEA Directive)
- Poor transparency in the evidence available to support the Core Strategy, principally relating to the management of tall buildings (PPS1)
- Inappropriately drafted heritage policies that do not provide a sufficient framework in which to protect and enhance all of the Boroughs heritage assets, encourage heritage-led regeneration or recognise the value of the local historic environment (PPS1, PPS5 and Cir07/09).

### **General Comments**



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Since issuing our representations on the Core Strategy Options report and Sustainability Appraisal in April last year, the Government has replaced PPGs 15 and 16 with a new, single policy statement regarding the historic environment, supported by the *Planning for the Historic Environment Practice Guide* and the Government's *Statement on the Historic Environment for England 2010*. Compared with PPGs 15 and 16, PPS 5 contains a number of fundamental issues which need to be reflected in the Core Strategy. PPS 5 takes broad definition of the historic environment, to cover "All aspects of the environment resulting from the interaction between people and places through time." In particular, PPS5:

- Differentiates between designated historic assets and the wider historic environment;
- Reiterates the need for plan-making to be informed by an understanding of local character, and of the contribution to that character made by the historic environment;
- Impacts on Heritage assets are to be judged for their implications for Historic significance and heritage value, incorporating English Heritage's approach to conservation, as set out in *Conservation Principles for the Sustainable Management of the Historic Environment (2008)*;
- Reiterates the need for an evidence-based approach to an understanding of character and historic environment as set out in PPS1;
- Requires that historic significance and heritage value be used to inspire new development and as the basis for enhancement of heritage assets and their settings;
- Requires that archaeological remains be recorded, evidence published and disseminated.

It is crucial that this approach thoroughly underpins the Core Strategy policies to ensure that it genuinely conforms with national policy in relation to the historic environment. All references to PPGs 15 and 16 as a source need to be replaced by references to PPS5 and its supporting guidance.

We are concerned that there appears to be no explicit character-based rationale behind the Borough-wide spatial strategies. PPS 1, paragraph 19, requires that plan policies are based on "*up-to-date information on the environmental characteristics of the area; and the potential impacts, positive as well as negative, on the environment of development proposals*". Failure to meet this requirement of PPS1 could lead to the Core Strategy being considered unsound (PPS 12) due to a lack of demonstrable evidence.

Borough-wide characterisation studies are an effective way of establishing the environmental characteristics of an area as part of the LDF evidence base and they can be used to ensure that development plans deliver high quality, sustainable places as part of spatial planning. The historic environment, whether designated or not, makes a significant contribution to local character, and should be given thorough consideration as part of the characterisation process.

We recommend that LB Lewisham produces a characterisation study incorporating an assessment of the Borough's historic environment. The findings of the study should be used to inform the Core Strategy spatial strategies, and to inform the borough's approach to the historic environment in general. This study could draw together information already contained in Conservation Management Plans, as well as the Borough's Tall Buildings Study.

We note that the Tall Buildings Study itself is listed as part of the LDF evidence base within the Core Strategy Proposed Submission Version Document, but that the Study is not available to view on-line. We strongly advise that this document is made publicly available for all to consider so that it is possible to assess the methodology used by the Council to identify areas of the Borough consider appropriate, inappropriate or sensitive for tall buildings (ref: Government endorsed EH/CABE Guidance on Tall Buildings section 2 (2007). In addition it is a requirement of PPS 1, paragraph 26, that when preparing development plans, planning authorities should be transparent and encourage participation in their development. As the Tall Buildings Study is key evidence base to the Core Strategy access to it should be easily available.

## Core Strategy Proposed Submission Version

To help ensure that the Core Strategy is fully consistent with PPS 5 and other policies and guidance we make the following detailed suggestions.

Page	Section	Para	Comment
2 Lewisham today			
11	2.2	2.7	<p>In view of our previous representation on the Core Strategy options report, we are disappointed to see that no further detail has been inserted into the introduction regarding Lewisham's historic context – its spatial evolution and its natural and historic assets which help define the borough's particular character. We note Lewisham's planning officer response that "The regulations encourage very brief core strategies which do not repeat information or policy contained elsewhere in national or regional guidance", however, we reiterate the need for Core Strategy policies to be clearly informed by an explicit understanding of borough character, including contribution to historic assets, as required by PPS1, and PPS5. This point in the document is the appropriate place to set out the borough's contemporary character, and the historic influences which have formed it. Such information does not repeat national or regional guidance, rather setting out what differentiates the borough from its peers within the region. It also helps provide a framework in which to justify the development of a Core Strategy that is locally distinctive.</p> <p>We note that there is still no reference to the Borough's identified historic assets beyond Listed Buildings and Conservation Areas. The Borough's Registered Parks and Gardens, Archaeological Priority Areas, Scheduled Monuments and World Heritage Site buffer zone should also be referred to.</p>
26	2.9	General	<p>This section should clearly set out the need to protect the Borough's historic environment in the context of growth in order to provide an explicit link between the description of local character and the policies which follow. We recommend that there should be references to protecting and enhancing vulnerable heritage assets for their intrinsic heritage value, and to ensuring that locations and designs of new development are informed by an understanding of the Borough's historic character.</p>
3 Drivers for change			
28	3.5	3.9	We are disappointed to see that there is still no explicit

Page	Section	Para	Comment
			recognition of the historic environment as a pillar of sustainable community. It is crucial that the historic environment and heritage assets are understood to be part of Lewisham's sustainable future, creating strong local identity in the context of great development potential. This is fundamental to the concept of sustainability, as set out in PPS 1, paragraph 5 and PPS 5 (Government's objectives, paragraph 7).
<b>4 Vision for Lewisham 2026</b>			
31	43	General, 4.8, 4.9	<p>In general, the Vision does not provide a clear enough statement on the need for development to enhance local distinctiveness, and historic character, as required by PPS1 and PPS5.</p> <p>We note that the key regeneration and development opportunities set out here have been identified due to the availability of sites, but we are concerned that these opportunities have not been suitably informed by a thorough understanding of the Borough's environmental characteristics, as required by PPS 1, paragraph 19.</p> <p>Therefore we strongly suggest that a Borough-wide character assessment be established as part of the LDF evidence base (see earlier comments), providing an understanding of the borough's historic evolution and the impact this has had on its current built and natural character. This evidence should then explicitly contribute to the rationale for the spatial strategy.</p> <p>In paragraph 4.8 we recommend that the text be inserted to identify <i>local and historic character</i> as being at the heart of new design. Paragraph 4.9 should acknowledge that character considerations have informed the key regeneration and development opportunities.</p>
<b>5 Strategic objectives</b>			
37	Core Strategy Objective 10	5.14	<p>5.14 We recommend that the first sentence is reworded to read "Lewisham's distinctive local character will be protected through sensitive and appropriate design, in particular those areas requiring managed change and protection such as the borough's heritage assets <i>and their settings</i>, yet..."</p> <p>a. "...contributes to a sense of place and local distinctiveness, <i>informed by an understanding of historic context</i>."</p> <p>b. "...alterations to existing buildings are sensitive, appropriate to their <i>historic</i> context, and make..."</p> <p>c. preserving or enhancing the <i>condition and historic significance</i> of the borough's <i>heritage assets and their settings</i>, and the other identified elements of the historic environment.</p> <p><b>Justification:</b> This will ensure that it is fully compliant with PPS 5 (see introductory comments on page 1 of this letter).</p>
<b>6 Spatial strategy</b>			
Spatial		General	In general we are concerned that the spatial policies set out in the

Page	Section	Para	Comment
policies			Core Strategy do not appear to have been informed by a Character Assessment within the evidence base (see comments regarding page 31 above). This section needs to demonstrate that appropriate growth locations and scales have been identified according to an understanding of local character. Where significant growth is considered appropriate, it should be managed to enhance existing local character, drawing on the contribution to that character made by the historic environment. This should be made as clear as possible both in the policies themselves, and in the text supporting each policy.
39	6.1, 6.2, spatial policy 1	6.1, 6.3, 6.4, 6.9	We suggest inserting references to local and historic character, reflecting comments immediately above.
42	6.2.1	6.12	We welcome the production of area-based planning documents to plan for change in the four centres identified. However, we do not appear to have any record of previous consultation on the draft Lewisham Town Centre AAP, or the Catford Town Centre AAP. As a statutory consultee, English Heritage looks forward to further involvement in the production of all of these documents.
42, 43	6.2.1	6.14	As suggested in the general comments above, please insert references to the character-based justification for the growth areas. At present this is not sufficiently reflected in the text.
55	4C	6.71	We would suggest that design should also be considered an opportunity to define and enhance local character, drawing on elements of the historic environment.
59	Spatial Policy 3		Blackheath “1. Ensure the preservation or enhancement of the village’s historic character and <i>significance</i> as well as character...”  <b>Justification:</b> according to PPS 5 change to historic assets, such as Conservation Areas, is appropriate where it enhances historic significance and heritage value. In residential Conservation Areas this includes residential character, which we would consider to be an aesthetic and communal heritage value (see English Heritage’s <i>Conservation Principles and Guidance for the Sustainable Management of the Historic Environment, 2008</i> ).
70	Spatial Policy 5		“1.a ensure that new development protects or enhances the quality of Lewisham’s character and <i>historic significance</i> , particularly within Conservation Areas. This reflects guidance set out in PPS 5.
73	3C	6.159	Final sentence “...contribute to biodiversity and <i>heritage value</i> as well as...”  <b>Justification:</b> this recognises that many of the borough’s open spaces have intrinsic heritage value which should be recognised and enhanced as part of any improvement programmes.
75		6.176	“Conservation areas will be protected from inappropriate built development and change that enhances <i>historic significance and heritage value</i> will be considered acceptable.”  <b>Justification:</b> according to PPS 5 change to historic assets, such as conservation areas, is appropriate where it enhances historic significance and heritage value. In residential conservation areas this includes residential character, which is an aesthetic and communal

Page	Section	Para	Comment
			heritage value.
94	Signposts and evidence base		Include PPS 5 and supporting guidance within the evidence base.
7 Cross-cutting and thematic policies			
101		7.87	Insert reference to PPS 5
104			Update references to PPGs 15 and 16 with PPS5 in evidence base
114	7.4.2	7.136, 7.139	Update references to PPGs 15 and 16 with PPS 5.
115		Policy 15	<p>Policy 15 – 3C. insert cross-reference to the Core Strategy Tall Buildings Policy 18; this provides a useful signpost to the more detailed policy wording set out in Policy 18 and EH/CABE’s <i>Guidance on Tall Buildings, 2007</i>. This policy needs to demonstrate evidence that Lewisham, Catford and Deptford Town Centres are considered appropriate locations for tall buildings.</p> <p>We are also concerned that the heritage value of assets outside Areas of Stability and Managed Change are not given equal protection to those inside them.</p>
115		4. District Hubs	a. “preserves or enhances the historic character <i>and significance</i> and that of the surrounding...” This will ensure consistency with PPS5.
117		Policy 16	<p>The policy should be amended further in order for it to be compliant with PPS1, PPS5 and Cir07/09. Areas of particular concern include;</p> <ul style="list-style-type: none"> <li>• Reference to the conserving and enhancing of all heritage assets and their settings.</li> <li>• The need to encourage heritage-led regeneration and to recognise the value of the historic environment and its heritage assets as a base in which to manage positive change</li> <li>• Reference to the need to protect and conserve the setting of the Greenwich World Heritage Site including its buffer zone. Also it should make a commitment to the implementation of the Greenwich WHS Management Plan.</li> <li>• Demonstrate an understanding and valuing of the local historic environment and its heritage assets (designated and non-designated). At present the policy does not reflect local characteristics of the Boroughs historic environment.</li> </ul>
		Policy Justification	The Policy Justification needs to be strengthened to reflect English Heritage’s Conservation Principles, the Government’s commitment to the historic environment, PPS5 and Cir 07/09 on World Heritage Sites. It should also provide clarity on the value of the local historic environment and how it can be used to help inform positive environmental, social and economic change.
117		7.142	Update reference to PPGs 15 and 16.
118	Policy 17		It is unclear how views will be managed and how they were

Page	Section	Para	Comment
			identified – this needs to be substantiated with evidence.
121	Evidence base		Update reference to PPGs 15 and 16.
128	Policy 21		We welcome the production of the Planning Obligations SPD and look forward to further involvement in its development. We seek to ensure that the historic environment is a priority recipient of planning obligations funding.
<b>8 Site Allocations</b>			
133	Strategic site allocation 2		To further strengthen this policy, we recommend that it identify opportunities for historical interpretation drawing on the history of the Henrician Dockyard. Archaeological findings from development of the site should be recorded and disseminated.  <b>Justification:</b> PPS 5 requires that new development at historic sites maximises opportunities for historic interpretation to reinforce local character.
144	Strategic site allocation 5		To further strengthen this policy, we recommend that it identify opportunities for historical interpretation drawing on the history of the Surrey Canal.  <b>Justification:</b> PPS 5 requires that new development at historic sites maximises opportunities for historic interpretation to reinforce local character.
148	Strategic site allocation 6		Point H should require that design responds well to the historic significance of St Stephen's Conservation Area  <b>Justification:</b> Site 6 abuts and provides a setting to St Stephen's Conservation Area and it is crucial that any development and public realm improvements here have due regard to the qualities of the Conservation Area.
<b>9 Delivery, implementation and monitoring</b>			
151	9.2	9.8	As a statutory consultee, English Heritage suggests that we are listed as a key delivery partner.
162	Evidence base		We note that the Borough has commissioned a Tall Buildings Study (2009). We suggest that this study is made publicly available on-line within the list of LDF evidence documents for the benefit of all stakeholders.

### ***SA/SEA Sustainability Appraisal – Core Strategy – proposed submission version***

English Heritage welcomes LB Lewisham's efforts to raise the profile of the historic environment in response to our previous comments on the Sustainability Appraisal scoping report in April 2009. We also welcome Objectives 11 and 12 which seek to maintain landscapes and townscapes, and conserve and enhance the historic environment. However, we remain concerned that these objectives do not make adequate reference to the protection of heritage assets as defined by PPS 5 which takes a broader definition of the historic environment (please see our comments above regarding the core strategy), and in particular we are disappointed that the treatment of the wider, non-designated historic environment is poorly referenced.

The Sustainability Appraisal refers to gaps in baseline data including a substantial omission of baseline data relating to heritage assets. English Heritage does not consider that these omissions can be adequately addressed through the proposed monitoring exercise. As a consequence, they render the SA ineffective in assessing the impacts of the Core Strategy on the historic environment, and in measuring the Core Strategy's contribution to sustainable development. In its current form we would advise that the Core Strategy does not meet the tests of soundness, as set out in PPS12, paragraph 5.2.



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In view of this English Heritage would advise that the following shortcomings should be addressed:

Page	Section	Comment
15-31	Baseline and context – the current state of the environment in Lewisham	The Local Authority identifies a number of significant gaps in the baseline data including information relating to ‘ <i>the design panel, conservation area appraisals, historic buildings at risk and applications affecting listed buildings and conservation areas</i> ’. As noted above, we are concerned that gaps have been identified relating to Conservation Area Appraisals and Historic Buildings at Risk. We recommend that such information is provided within the SA. Up-to-date information on heritage assets at risk can be drawn from English Heritage’s Heritage at Risk register. This is available online at <a href="http://www.english-heritage.org.uk/server/show/nav.19074">http://www.english-heritage.org.uk/server/show/nav.19074</a> . We note that the register currently identifies 7 Listed Buildings and 2 Conservation Areas as being at risk.
	2.2	<p>The baseline information should demonstrate an understanding of the historic environment and its contribution to the social, economic and environmental character of the Borough. This includes identifying the borough’s designated heritage assets and broad character of the wider historic environment (as required by PPS 5).</p> <p>We welcome the references to the Borough’s Listed Buildings and Conservation Areas. There should also be references to other designated heritage assets: Scheduled Monuments, Archaeological Priority Areas, Registered Parks and Gardens (which should also be included in the subheading of ‘Open space and environmental assets in paragraph 2.8). There should also be a reference to the Greenwich World Heritage Site Buffer Zone.</p> <p>Non-designated heritage assets could include buildings, spaces and townscape features that are of local heritage value, such as locally listed buildings and/or areas of local merit. Without this baseline information it is not possible to assess the effectiveness or impact of the Core Strategy upon the historic environment and raises concerns with regards to its compliance with PPS 5 HE 5.1.</p>
32	Likely trend in Lewisham’s environment without implementation of the core strategy	No reference is made to the likely impact on Lewisham’s heritage assets without the implementation of the Core Strategy. Such impacts could include loss of or damage to heritage assets, loss of historic significance and heritage value within the historic environment, and harm to historic and local character.
34	Main economic, environmental	Our previous representations referred to The London Historic Environment Forum publication <i>Capital Values</i> , which

	and social issues facing Lewisham	<p>demonstrates the economic, social and environmental contributions that the historic environment can make to an area. We are disappointed that these aspects of the historic environment have not been recognised within the table of economic and social ‘Key Issues’ for the SA, particularly given the status of some of Lewisham’s town centres and sites as Opportunity Areas, Areas for Intensification and Areas for Regeneration.</p> <p>We welcome the inclusion of the Key Issue to <i>Protect cultural, archaeological and historic heritage from redevelopment</i> but consider that this should be reworded to accommodate opportunities for enhancement. It should also reflect the objectives of PPS 5, particularly those expressed in Policy HE3 which seeks to ensure that LDFs consider how the qualities of heritage assets can contribute to the sustainable development of an area and promote a sense of place in new development. The evidence base listed as informing the inclusion of this key issue should include any characterisation work, and the Borough’s Tall Buildings Strategy. This evidence should therefore be available to comment upon by all interested in the development of the Core Strategy.</p>
40	SA objectives	<p>We suggest that SA Objective 12 ‘<i>To conserve and where appropriate, enhance the historic environment and other archaeological aspects of the borough</i>’ is reworded to reflect PPS5 to ‘<i>To conserve and enhance heritage assets and utilise the historic environment in the creation of sustainable places</i>’</p> <p>Appendix 9 which supports the SA Objectives sets out the indicators, appraisal questions and targets for the SA. We strongly advise that the historic environment is backed up with robust indicators and targets such as those included in The ODPM guide ‘<i>A practical guide to the Strategic Environmental Assessment Directive</i>’ which lists a number of possible SEA objectives and indicators that can be used to support the SEA topic of Cultural heritage and landscape. In addition we would strongly advise you to consider English Heritage’s recent publication <i>Strategic Environmental Assessment, Sustainability Appraisal and the Historic Environment Policy Statement (2010)</i>. With this in mind, we suggest that Appendix 9 is amended to include examples from this guidance document (examples of indicators are shown on pages 9 and 10).</p>
51-68	7.1 Appraising the internal consistency of the SA objectives	<p>This section appraises the core strategy strategic objectives identifying benefits and conflicts arising through the implementation of SA Objectives.</p> <ul style="list-style-type: none"> <li>• Strategic Objective 1 should identify the potential for the</li> </ul>

		<p>historic environment to act as a catalyst for regeneration in an area, in particular through leisure, tourism and economic development</p> <ul style="list-style-type: none"> <li>• The consideration of the impact of increased development on the historic environment should be considered consistently throughout this section, identifying both the potential for conflicts, but also for opportunities arising from the appropriate management of the historic environment to deliver sustainable development objectives and taking into account the wider social, cultural, economic and environmental benefits of heritage conservation</li> <li>• English Heritage welcomes the recognition of the role of the historic environment in assessing Strategic Objective 10 to <i>'Protect and enhance Lewisham's character'</i> but, we suggest that all types of heritage asset are listed here.</li> </ul>
69-78	Appraising Lewisham's spatial strategy	<ul style="list-style-type: none"> <li>• As with our comments relating to the Core Strategy above, we are concerned that the policy development for the spatial options has not been adequately informed by a character appraisal of the growth areas/district hubs/local hubs and areas of stability and managed change.</li> <li>• The statement that the selected spatial policies will result in the <i>'protection of conservation areas, the historical environment and other archaeological aspects of the borough'</i> is applied inconsistently throughout the spatial options, and it should be demonstrated that no spatial policy will result in the unnecessary degradation or loss of historic assets.</li> </ul>

## Proposed Changes to the Lewisham UDP Proposals Map

English Heritage has no comments to make regarding the proposed alterations to the Strategic sites or Conservation Areas in sections 2 and 3. However, we have no record of being consulted on any of the proposed alterations to the Conservation Areas, and wish to remind the Borough of its statutory duty to consult English Heritage in this regard.

We would remind you that the Proposals Map should include heritage assets such as Registered Parks and Gardens and Scheduled Ancient Monuments. Not to do so would make the Plan non-compliant with PPS12 paragraph 8.1.

We note the proposed alterations a number of open spaces within the Borough in section 4. While we have no specific comments to make, we reiterate the need to ensure that historic significance and heritage value is preserved and enhanced as part of any alterations to them. To facilitate this process, we suggest consulting the London Parks and Gardens Trust which researches and promotes London's open space network ([www.londongardenstrust.org](http://www.londongardenstrust.org)).

English Heritage is pleased to see references to protected corridors, as identified in the 2007 London View Management Framework. It is important that this policy is updated on adoption of the draft Revised London View Management Framework once it is adopted.

## Conclusion

English Heritage is keen to ensure that Lewisham's Core Strategy and SA are fully consistent with national planning guidance regarding the historic environment. At present we believe the Core Strategy to be unsound, the reason of which are set out in the above letter.

In order to explore how these concerns can be addressed, we would like to arrange a meeting with you at the earliest opportunity to discuss the soundness of the Core Strategy.

Looking to the longer term, we note that there are a number of area-based documents in production for Lewisham which will follow the adoption of the Core Strategy, including the Lewisham Town Centre and Catford Town Centre AAPs. We are keen to remain fully involved in the development of these and other subsequent LDF documents, and look forward to further liaison with you accordingly.

It must be noted that this letter is based on the information provided by you and does not affect our obligation to advise you on, and potentially object to any specific development proposal which may subsequently arise from this or later versions of the development plan documents, and which may have adverse effects on the environment.

Yours sincerely



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