

For the Attention of the Lewisham Planning Policy Team

Draft Lewisham Tall Buildings Study & Addendum

Thank you for inviting us to submit comments on the above documents.

1. Comments on Draft Lewisham Tall Buildings Study

In the links to the Draft Policy on Tall Buildings and the Addendum you preface your invitation to submit comments with the following statement:

'What we are not asking

We appreciate that there are wide-ranging views on building heights. However:

- *As this is an evidence base document which has been prepared by independent consultants to provide an objective assessment we are not asking whether you agree or disagree with the findings of the Addendum'*

We do not accept this restriction on discussion of the documents because we believe that the Draft Tall Buildings Study and Addendum are based on interpretations that are open to question. Planning Policy, whoever drafts it, is not infallible and to argue that its preparation by independent consultants justifies its acceptance without question does not make sense. Such assumptions have led to misconceived development in the Borough, notably at Lewisham Gateway.

We welcome the drafting of the study and the bulk of its content but wish to take issue with the emphasis and detail as follows:

The study identifies areas in the vicinity of transport hubs as suitable for development with tall buildings. However, we suggest that proximity to transport hubs justifies increased *density* of development but not necessarily tall buildings. The criteria used for accepting tall buildings in an area include *avoiding* negative impact on established neighbourhood character, historic buildings, or views. These criteria assume that in the absence of negative impacts tall buildings will be acceptable. We do not accept this logic.

We believe that greater emphasis should be given to qualitative aspects of the New London Plan Guidance (2019), such as, '***spatial hierarchy and role in legibility and wayfinding***' (Draft Tall Buildings Study - Item 1.3.6), that will generate a richer urban environment in the Borough. In other words, tall buildings should not be embraced as the default option. Whilst we accept that tall buildings can work well in small clusters, our view is that in larger numbers they can devalue the character of urban space, as is demonstrated by the environment at street level in Lewisham Gateway. Instead, we propose that dense urban development should be street-based with the clear hierarchies of scale and public realm that are found in established quarters of European Cities, such as London, Paris, or Barcelona. This approach is supported by the comment in the New London Plan Guidance, '***high density does not need to imply high rise***' (Draft Tall Buildings Study - Item 1.3.8).

We believe that the draft policy will create an assumption in favour of tall buildings across wide swathes of the Borough that will contribute to a chaotic urban environment that favours quantity at the expense of quality. Accordingly, we request that the emphasis of the policy is changed to reflect the qualifications found in the New London Plan Guidance and the reservations stated above.

2. Comments on Draft Lewisham Tall Buildings Study - Addendum

Our comments are confined to two areas included in the Draft Addendum:

2.1 Forest Hill

We support the limit on building heights in the vicinity of Forest Hill Station: 6 storeys in Area 'A' and 8 storeys in Area 'B'

2.2 Bell Green

Our comments are restricted to the area of Bell Green Retail Park and its immediate environs, as defined in the 2019 Discourse Architecture proposals.

Further to our comments on the Draft Tall Buildings Study in Item 1. above, we do not support the designation of maximum building heights given: 20 storeys in Area 'A' and 16 storeys in Area 'B' (Draft Tall Buildings Study Addendum - Item 2.9.5). This would license a Lewisham Gateway style environment with a hotch-potch of tall buildings lacking a coherent urban framework. Instead, we propose that the general height of buildings should be limited to a maximum of 10 storeys organized in streets. We would have no objection to a cluster of up to 3 tall buildings associated with a new bus station and or relocated Bakerloo Line station. These could exceed 20 storeys. Potentially even 25 storeys could be acceptable subject to their design being of high architectural and urban quality. However, the suitability of towers in this location would depend on appropriate function.

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