

DC/22/129789 | Demolition of existing buildings and redevelopment of the site comprising a block rising to 5/6 storeys accommodating 1,401sqm of employment floorspace (Use Classes E(g)(i)(ii)(iii)) at ground and mezzanine floors and 60 residential units (Use Class C3) above, with associated landscaping, amenity areas, cycle, car parking and refuse/recycling stores at 21- 57 Willow Way, London, SE26 | 21- 57 WILLOW WAY, LONDON, SE26 4QP

Hello Kate,

Please find my transport comments below

Site Location/Context:

The site is located on Willow Way, Sydenham. The site is surrounded by a mix of uses including residential housing to the north, a retirement care home to the east and Willow Business Park to the south. The immediate area is surrounded by industrial type units associated with the Business Park. The existing site comprises a garage, office, warehousing and one residential unit covering an area of 1,341sqm.

The site is located in a PTAL of 4 which is considered to be of good accessibility with good access (200m walk) to regular bus services along Dartmouth Road and Kirkdale Road with the nearest train station (Forest Hill) an approximate 800m walk from the site. The site is not located in Controlled Parking Zone (CPZ).

The footpaths on Willow are narrow in nature with on street kerbside parking which further reduces the footway width.

Car Parking:

The existing site accommodates two car parking areas which is used by staff and for the delivery and servicing of the existing site. The proposals indicate a car free site which is generally welcomed and in accordance with Policy T6 of the London Plan. A car free site would stipulate that car parking permits would not be eligible for purchase by any new occupants of the site should a CPZ be implemented within the vicinity of the site with the exception of Blue Badge holders.

Car parking and Census Data:

In order to assess the potential level of overspill parking within the immediate area a parking stress surveys should be undertaken and a census assessment should be completed to estimate the potential number of residents that would park on-street due to the no car parking restrictions. The applicant have provided a car parking stress survey and an assessment on 2011 census data .

The parking survey map at Appendix E is not clear. The dropped kerb key is shown twice and this will need clarification and correcting. Additionally the raw data associated with the survey has not been provided which we will need to review in addition to the map corrections. The summary provided within the TA at Table 6.2 shows very low parking stress which I would like to review against the raw data.

The census data clearly shows that there is a potential that 12% of occupants of the residential units may drive to work and therefore will own a car which equates to 12 car parking spaces. The applicant adjusted this to 3% in line with the car free nature

of the site. However if there were 12 cars associated with the development could this be accommodated on-street. The surveys indicate a spare capacity of 31 spaces on unrestricted parking spaces which would indicate sufficient capacity. Please note the assessment of single yellow line and double yellow line parking availability is not considered acceptable and has not been reviewed as part of the assessment presented. Parking on single and or double yellow line is considered as restricted parking and not appropriate for this assessment. As mentioned above the applicant will need to provide the raw data for review.

Disabled Parking: Proposals indicate provision for two disabled parking spaces which the Transport Assessment states represents 3% passive provision with the remaining 7% identified as three spaces within the site and one on street space which all can be converted to an accessible spaces if demand arises. The residential proposals are in accordance with Policy T6 of the London Plan and are considered acceptable. The application omits one disabled parking space in association with the commercial proposals for staff or visitors. Policy T6.5 non-residential disabled parking stipulates access to at least one disabled parking bay (on or off street). This will need to be addressed. The application should also be accompanied with swept paths of a large vehicle accessing parking and egressing the site which has not been provided.

20% of the disabled bays should be EV ready with 20% passive provision. This equates to one disabled pace with an EV charging point and one passive space. This will need to be shown on the plans and secured by condition.

Please note there are concerns that there is no parking or turning area for service and delivery vehicles which are addressed later within this review.

Site Access:

Existing pedestrian and vehicle access is taken from Willow Way where there is an existing vehicular crossover into the site at two locations on Willow Way which leads to an area of hardstanding for car parking and for vehicles to turn around and exit the site for deliveries and servicing. The existing entrances for pedestrians and vehicles are not segregated. Willow Way is subject to a 20mh speed limit.

The site will continue to provide pedestrian access from Willow Way at multiple entrances along the frontage and separate entrances segregated from the vehicles access are welcomed. Cycle access will also be taken from two locations along Willow Way which is considered acceptable.

The width of the access is considered acceptable however the 1.2m footpath should be a minimum of 1.5m to allow for a pedestrian and a wheelchair user or pedestrian with a buggy to pass each other in accordance with TfL's Streetscape Guidance and in accordance with DfT's inclusive mobility guidance.

Footway Widths and Carriageway Widths:

Willow Way is subject to narrow footways on both sides of the carriageway. As part of this application the proposed ground floor plan shows a general footway width of 2.5-2.8m along the site frontage. However with the mounted kerbside parking this width would be reduced. The applicant will need to provide an assessment of how

much effective footway width there will be for pedestrians with parked cars. The introduction of 60 residential units at a car free site indicates that there will be a high percentage of occupants travelling by foot, cycles and via public transport. The TA at paragraph 5.3.12 indicates that there will be a peak of 58 people trips in the AM period as a result of the proposed development. The existing footways along the front of the site would benefit from widening to accommodate the new development.

The applicant has submitted a emerging Masterplan document that shows significant changes to the public realm including a setback of the buildings to create a 20m street width to allow for active travel, parking and servicing. Also the plan shows a one way vehicle restriction accompanied with a cycle contraflow lane. All of this is welcomed and would address the issues raised above. However no improvements specifically with regards to widening of the Willow Way Footpath have been proposed. This is something that will need to be addressed in order for the application to be considered acceptable to Transport. Options like setting the building back to improve the existing footway for this application will need to be considered. Our reasoning for this based on the policy below:

London Plan Policy T2 refers to the Healthy Streets Approach in which it states, *'development proposals should deliver patterns of land use that facilitate residents making shorter, regular trips by walking or cycling'* (Policy T2A London Plan, 2021.) High quality streets are *'fundamental to the character and efficient functioning of the city and play a fundamental role in moving people around safely, improving public realm and providing spaces for people to come together'* (Policy 10.2.1 London Plan, June 2021.)

Londoners direct interaction with the Healthy Streets Approach will be through the streets they use every day. The Healthy Streets Approach aims to bring about positive changes to the character and use of the city's streets. High-quality, pleasant and attractive environments with clean air and enough space for dwelling, walking, cycling and public transport use must be provided (Policy 10.2.4 London Plan, June 2021.)

Cycle Parking

All cycle parking should be in accordance with Policy T5 of the London Plan and in accordance with the guidance set out in the London Cycle Design Standards (LCDS). The applicant indicates a provision of 107 long stay cycle parking for the residential units in a mix of Sheffield, two tier and large accessible spaces. The mix of spaces and layout is considered acceptable. The commercial proposals would attract three long stay cycle parking spaces which do not appear to be on the shown on the plans. The applicant will need to provide staff cycle parking and show these on the plans (this will need to be covered and secured). However there is sufficient visitor cycle parking shown on the plans for the residential and commercial elements of the proposed development.

Trip Generation and Impact

The selected TRICS sites are considered acceptable and the expected overall net additional trips associated with the proposals have been assessed and are generally acceptable. The adjustments made to accommodate a car free site should not be adjusted but be accounted for a potential overspill parking and therefore the TA will

need to be updated. Additionally the potential number of Light Goods and Other Goods vehicles appears to be low despite the appropriate choice of sites in TRICS. There are concerns that the proposed loading bay will not be sufficient to accommodate all the delivery and servicing associated with the commercial and residential elements of the site.

Lewisham Transport request an on site survey be undertaken of the number of delivery and serving vehicles that are entering and exiting the site during a weekday between 7am to 7pm. This survey will ascertain the total number of vehicles and therefore determine if the proposed loading bay is sufficient or if a new strategy will be needed.

Refuse Delivery and Servicing

Taking note of the above comments relating to the expected goods vehicles to the proposed site. Concerns are raised with regards to the proposed on street loading strategy and if this is sufficient to accommodate all associated trips. The loading bay will only be able to accommodate one 10m 'box van' type vehicle at any one time, or it will be only be able to accommodate 2 'standard' sized at any one time. There are concerns with service and delivery vehicles having to park elsewhere along Willow Way when the loading bay is occupied. Further details will need to be provided to evidence this loading bay is sufficient for the overall site including refuse collection. Lewisham would prefer servicing and delivery to be kept within the site where possible. If this is not possible the above concerns will need to be addressed in detail.

Refuse officers should also be consulted with regards to the size and location of the bin store. It should be reminded that residents are not permitted to carry refuse bins more than 30m to the bin collection point and waste operatives are restricted to a maximum 10m drag distance on collecting bins. It is suggested that a more detailed refuse strategy at this stage is presented to show the proposals adhere to the above requirements. Once approved this should be secured by condition.

Healthy Streets (Active Travel Zone Assessment)

The active travel zone assessment is considered acceptable. There are many suggested improvements that Lewisham Transport agrees with. It is suggested that items in Table 4-7 of the TA are set out as highway improvements and are secured as part of a section 278 agreement should planning approval be granted. The suggested improvements will need to be refined and detail provided where required before the agreement is finalised.

Construction Logistics Plan

The construction Logistics Plan (CLP) as part of the TA is generally acceptable however a more detailed CLP will need to be secured via condition which will need to provide swept paths of the largest construction vehicles entering and exiting the site, a detailed site set up plan will need to be provided and deliveries will also need to avoid school pick up and drop off times (therefore no deliveries before 9am and no deliveries between 3-4pm) The CLP will need to be in accordance with TfL's CLP guidance.

Section 278 Improvements

As described above under Healthy Streets

Section 106

- Agreement to restrict the purchase of car parking permits with the exception of blue badge holders
- 15k contribution to any studies or projects to improve/manage parking, traffic or active travel in the vicinity of the site

Summary/Conclusion

Lewisham Transport consider the proposals to be acceptable in principle however there a number of concerns which have been highlighted above which will need to be addressed prior to the application being considered for approval by Lewisham Transport.

Planning Conditions (if and when approved)

Detailed CLP

Detailed DSP

Refuse Strategy

Full Travel Plan

Charging Points

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Public Realm

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