TOWN AND COUNTRY PLANNING ACT 1990: SECTION 78 APPEAL

21/57 WILLOW WAY, LONDON, SE26 4AR

PLANNING INSPECTORATE REF. APP/C5690/W/23/3321935

REBUTTAL OF RICHARD KALMAR TO THE PROOFS OF EVIDENCE OF THE COUNCIL

DATED: 17 10 23

Since submitting my proof I have been made aware of a planning application at The Apollo
Business Centre Surrey Canal Road SE8 5JE, that was passed last week. The DAS for the Apollo
development can be seen at https://planning.lewisham.gov.uk/online-applicationDetails.do?activeTab=documents&keyVal="LEWIS">https://planning.lewisham.gov.uk/online-applicationDetails.do?activeTab=documents&keyVal="LEWIS">https://planning.lewisham.gov.uk/online-applicationDetails.do?activeTab=documents&keyVal="LEWIS">https://planning.lewisham.gov.uk/online-applicationDetails.do?activeTab=documents&keyVal="LEWIS">https://planning.lewisham.gov.uk/online-applicationDetails.do?activeTab=documents&keyVal="LEWIS">https://planning.lewisham.gov.uk/online-applicationDetails.do?activeTab=documents&keyVal="LEWIS">https://planning.lewisham.gov.uk/online-applicationDetails.do?activeTab=documents&keyVal="LEWIS"

• This is also a mixed use development in an industrial area (SIL) of a comparable size. It is worth noting that:

- The local authority has accepted the mezzanine floor space as usable floor space. In my proof at 7.4.6 in response to the LPA proof at 7.4 I point out that Willow Way has substantial mezzanines, 3 goods lifts, more than Apollo, and therefore meets the test required by the GLA on what constitutes floor space. I go on to point out that the RICS includes mezzanine in their definition of floor space and give examples of other estates where mezzanines have been included.
- There is a much lower percentage of double height space on the Apollo Development than at Willow Way which has over half double height space.
- The access to the site is from a busy road and in my view is difficult; Willow Way should be easier for loading. Although they show a lorry on their drawing in the DAS it would be difficult for this to enter in a forward gear and turn within the site to leave in a forward gear. Backing a lorry into the road at this very busy junction would be dangerous.
- The specification is just to a shell and core, whereas Willow Way is advances shell with windows lifts and flues installed.
- Although they state they have consulted a commercial agent on the development, none are shown in the team on the DAS.
- Overall I believe the space at Willow Way will be more attractive to businesses.