

From: [REDACTED]
To: [REDACTED]
Cc: [REDACTED]
Subject: FW: Willow Way - noise and ecology
Date: 21 March 2023 09:20:09

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Good morning [REDACTED]

I have received the correspondence below from [REDACTED] but still nothing about the strategy moving ahead...

Hopefully Michael Forrester will phone you back today and we can decide on the next step!

Thanks,

[REDACTED]

[REDACTED]

[REDACTED]

*Any offers contained in this email are Subject to Contract and are without prejudice.
Kitewood Estates Ltd is registered in England with number 02852063. The Company's registered address is 7 Dacre Street,
London SW1H 0DJ*

From: Harrison, Kate <Kate.Harrison@lewisham.gov.uk>
Sent: Tuesday, March 21, 2023 8:51 AM
To: [REDACTED]
Cc: Clegg, Gareth <Gareth.Clegg@lewisham.gov.uk>
Subject: Willow Way - noise and ecology

Hi [REDACTED]

[REDACTED] Just logging in quickly this am to send you the full noise comments and ecology comments- the latter came in Friday.

I will ask admin to help with full comments on anything else today.

Best wishes,



Noise Comments

I note the acoustic submission prepared by 24 Acoustics ref. R9784-1 Rev 1 and dated 16th December 2022 and recommend the following conditions be attached to any consent:

Noise Protection Scheme

Façade sound insulation shall be of a standard to achieve noise levels within bedrooms and living rooms of the residential dwellings as recommended in Table 4 of BS 8233:2014 'Guidance on sound insulation and noise reduction for buildings'. Where achieving the recommended internal levels requires windows to be closed shut then alternative ventilation, as necessary shall be provided.

Details of the final glazing fabrication and acoustic specifications shall be submitted to and approved in writing by the Local Planning Authority prior to the commencement of the development and shall be installed prior to occupation of the relevant part of the development and be so maintained.

In respect of any mechanical plant I recommend the following:

Mechanical Services Noise Control Condition

(a) The rating level of the noise emitted from fixed plant on the site shall be 5dB below the existing background level at any time. The noise levels shall be determined at the façade of any noise sensitive property. The measurements and assessments shall be made according to BS4142:2014.

(b) Details of a scheme complying with paragraph (a) of this condition shall be submitted to and approved in writing by the local planning authority prior to first installation.

(c) The development shall not be occupied until the scheme approved pursuant to paragraph (b) of this condition has been implemented in its entirety. Thereafter the scheme shall be maintained in perpetuity.

In respect of the separating elements between commercial and residential I recommend the following:

Noise Impact on Structurally Adjoining Properties/Premises

(a) No development beyond piling shall commence until full written details, including relevant drawings and specifications of the proposed works of sounds insulation against airborne noise to meet $D_{nT,w} + C_{tr}$ dB of not less than 55 for walls and/or ceilings where residential parties non domestic use shall be submitted to and approved in writing by the local planning authority.

(b) The development shall only be occupied once the soundproofing works as agreed under part (a) have been implemented in accordance with the approved details.

(c) The soundproofing shall be retained permanently in accordance with the approved details

Whilst I note the submitted outline construction and Environmental Management Plan prepared by Kitewood Estates dated December 2022 I would recommend the following condition be attached to any consent:

Construction Environment Management Plan

No development (excluding demolition and required below ground works circa. 1 meter) shall commence on site until such time as a Construction Management Plan, in general accordance with the Outline Construction Logistics Plan (prepared by Kitewood Estates dated December 2022) has been submitted to and approved in writing by the local planning authority. The Plan shall cover:

(a) Dust mitigation measures with regard to Mayor's "Control of Dust and Emissions During Construction and Demolition" (SPG) dated July 2014

(b) The location and operation of plant and wheel washing facilities

(c) Details of best practical measures to be employed to mitigate noise, Vibration arising out of the construction process

(d) Details of construction traffic movements including cumulative impacts which shall demonstrate the following:-

- (i) Rationalise travel and traffic routes to and from the site.
- (ii) Provide full details of the number and time of construction vehicle trips to the site with the intention and aim of reducing the impact of construction related activity.
- (iii) Measures to deal with safe pedestrian movement.

(e) Security Management (to minimise risks to unauthorised personnel).

(f) Details of the training of site operatives to follow the Construction Environment Management Plan requirements.

(g) An Operational Unexploded Ordnance (UXO) Emergency Response Plan

Moving on to matters relating to contaminated land I note the findings of the Phase I Desk Study and Site Reconnaissance prepared by Leap Environmental Limited Report Reference: LP3169 dated 19th December 2022 and recommend the following condition be attached to any consent:

Ecology Comments (Came through Friday)

Reviewed documents:

- Preliminary Ecological Assessment (PEA)
- Outline Construction and Management Plan (CMP)
- Proposed Drawings
- Landscape Design Statement

ter reviewing the above documents, I have the following comments:

1. The PEA complies with requirements of best practice and the Lewisham Biodiversity Planning Guidance.
2. Due to the current limited biodiversity value of the site there is potential to improve the site and deliver net gain for biodiversity.
3. Bats and breeding birds are legally protected (e.g. Wildlife and Countryside Act 1981, Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019) and it is an offence to deliberately kill, injure, disturb or capture them. Demolition could affect a bat roost (or nesting birds) in a building and two buildings were identified to have low potential for supporting bat roosts. Further surveys were recommended by the PEA. These surveys have not yet been conducted or provided with the application, therefore we cannot *“fully assess the potential effects of the proposals on protected species”*. Relevant quote from the ecology report: *“Further ecological survey work will need to be undertaken prior to the determination of any planning application in order to allow the Local Planning Authority to fully assess the potential effects of the proposals on protected species. At this stage, it is therefore not possible to confirm that the proposals for the site meet the requirements of NPPF and London Borough of Lewisham (refer to Section 2.0). The full detail of mitigation measures cannot be established without the results of more detailed survey work. The more detailed survey work recommended for the site are bat emergence/re-entry surveys (Paragraph 5.5.2)”*
4. Sydenham is one of the hotspots for bats in Lewisham ([see appendix 3 of BAP](#)) so bats in this area need to be properly considered.
5. CMP: The outline CMP does not even mention biodiversity or any provisions on how to avoid impact on wildlife during construction.
6. In general, the proposed plans do not seem to maximise opportunities to improve the site by soft landscaping at ground level as the majority of the site is proposed to be built on or covered with hardstanding (e.g. parking spaces). There is also a discrepancy between the proposed drawings and landscape design drawings at ground level. The former proposes 5 parking spaces and 5 new trees, while the latter (3.1.1) only 2 parking places and 6 trees.
7. Living roofs, wildlife friendly planting and podium level landscaping are welcomed in principle. However none of these will be publicly accessible. GR2, point I of the emerging local plan (Reg 19 version) requires that *“Development proposals, should maximise opportunities to introduce new publicly accessible open space, giving priority to green space, as well as improve connections to existing or planned new open spaces, particularly in areas of open space deficiency. Major developments must incorporate new publicly accessible open space unless it can be clearly demonstrated that this is not feasible, in which case off-site contributions may be required.”* The site is located in an area of deficiency to open space (>2 and >20 ha) and it is a major development therefore publicly accessible open space must be incorporated in the development.
8. The UGF mentions living roofs but there are no further details provided. It is unclear if the UGF calculation considered a biosolar system or the size of the proposed living roof will be reduced due to PV panel installation on the roof in which case the UGF needs to be recalculated.

relevant policies:

Wildlife and Countryside Act 1981 (as amended)
Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019
Protected species standing advice
[Lewisham Biodiversity Planning Guidance](#)
[Lewisham Biodiversity Action Plan](#)
NPPF 2021
London Plan 2021
Environment Act 2021
Regulation 19 version of Lewisham Local Plan

Recommendation:
Objection

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Conservation comments	
Application reference	22/129789
Site Address	21- 57 WILLOW WAY (Site A)
Proposal	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
Officer	
Date	

Comments:
<p>Significance</p> <p>The site lies to the west of Sydenham Park Conservation Area, whose boundary wraps around the NE and E sides of the site. This CA does not have an Appraisal but it is a tightly bounded area of mid C19th and later substantial villas and smaller picturesque houses arranged principally on three streets: Sydenham Park, Sydenham Park Road, and Albion Villas Road. Unifying characteristics are the substantial plots, detached layout, large gardens to front and rear, and the many mature large-canopied trees in the front gardens which lends the streetscene a green and leafy appearance, as well as in the rear gardens and open spaces of Albion Millenium Green and Trinity Church. Views between the semi detached villas on Sydenham Park Road, and also along Shrubland Close allow important glimpses of the large canopy trees in gardens and sites to the rear.</p> <p>The site lies to the east of Kirkdale (formerly known as Sydenham Extension) ASLC. This has not been consulted upon or formally adopted, but the proposed boundary includes the stretch of Kirkdale between Peak Hill and Dartmouth Road, as well as Fransfield Road and the grade II listed former Sydenham Public Lecture Hall (1859-61) to the north.</p> <p>The following listed buildings are also near the site to the west:</p> <ul style="list-style-type: none"> • 134-146 Kirkdale, grade II, Parade of five shops with apartments above, c1896. • 124-128 Kirkdale, grade II, Central part of a symmetrical composition made up of 2 pairs and a single house between, early to mid C19th. <p>Impact/Harm</p> <p>CA</p> <ul style="list-style-type: none"> • The development site is in the immediate setting of Sydenham Park CA boundary, and the layout extends built form very close to the boundary. • There is an abrupt change of levels which means the development at 5 – 6 storeys will rise significantly higher than the existing 2 storey buildings of William Wood House (built in the gardens of the villas on Sydenham Park Road, see image below) and also appear

much higher than the predominant villa development within the CA.

- The close proximity will exacerbate the impact of the uncharacteristic height and will unduly enclose the view to the west, appear dominating and uneighbourly.
- Site section CC should be extended to reach the houses on the far side of Sydenham Park Road to demonstrate the visibility of the highest part of this proposal from this principle street.
- Other development in the setting of the CA is generally of similar height to the CA or lower. Miriam Lodge is the one building in the immediate setting of the CA which is notably taller, [REDACTED] storeys. The narrow slab form of this building and its orientation minimises its visual impact on the CA, having a significantly less enclosing impact to the SE, and it's broad side is set further away from the CA to the NE.
- The proposal, in contrast, is a continuous linear development rising [REDACTED] storeys, with no gaps that would alleviate the sense of enclosure, nor sufficient open space provided to provide tree planting which could soften the impact.
- Townscape viewpoints have been identified but the views not yet provided.
 - The view points chosen from Sydenham Park Road [REDACTED] are oblique and so will only show the development where it rises above the houses, and not as it appears between the houses. I advise that 2 views from Sydenham Park Road that show the impact on a) view between the semi detached pairs at [REDACTED] SPR, and b) along Shrublands Close should be provided.
 - View 1 is very unlikely to show the site at this location – the view point should be moved further east until the site becomes visible.
 - A view from the junction of Willow Way and Kirkdale should be included to show the impact on the LBs and ASLC
 - View 6 also very unlikely to show the site as the redeveloped Police Station building is in the way. Not sure why this has been chosen? A point closer to the N end of Willow Way would be more useful.

I advise that on the basis of the information submitted so far, that the proposal is likely to cause a moderate degree of harm to the setting of the CA (less than substantial in NPPF terms). This harm does not appear to be clearly or convincingly justified and could be avoided or minimised by setting the development further away from the site boundary at the southern end, providing open space and tree planting along the whole eastern boundary, and variously reducing in height, introducing set backs to the massing of upper levels, and creating gaps in built form at upper levels.

I have no objection to the approach to elevational design or materiality which could sit comfortably in the CA context subject to the points above being addressed.

Kirkdale ASLC

- The proposal will have some impact on the setting of the Kirkdale ASLC due to available views down Willow Way. Particularly detrimental would be the loss of visibility of the mature large canopy trees in the CA which are currently visible over the top of the lower rise existing buildings (see image below). These lends the street a much more pleasant and inviting character than would be the case without them – the proposed buildings will completely obstruct these views.
- No street trees are proposed along the frontage of this site that would mitigate this loss, and the resulting streetscape would be unrelieved, hard and urban. I note that trees are identified as being located on the other side of the road in the draft masterplan, but having trees on both sides of the road would provide a better pedestrian environment for all and

provide a more attractive setting to the ASLC and the LBs.

- Illustration 2.1 shows a street tree which does not currently exist on site and which is not proposed on their drawings so should be either added to their proposals or removed from the illustration.

LBs

- This impact would be similar on the setting of the LBs on Kirkdale – or at least those closest to the junction with Willow Way. I consider this would be a low degree of harm (less than substantial), which could be mitigated by providing sufficient space for street tree planting in front of this site.

Relevant Policies:

Section 68 of the Act states that special regard shall be had to the desirability of preserving the listed building or its setting or any features of special architectural or historic interest which it possesses.

Section 72 of the Act states that special attention shall be paid to the desirability of preserving or enhancing the character or appearance of a conservation area.

NPPF Para. 199 - requires great weight to be given to the conservation of designated heritage assets and notes that significance can be harmed or lost through unsympathetic development.

NPPF 200 – Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting) should require clear and convincing justification.

NPPF 202 – Less than substantial harm to designated heritage assets should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use

NPPF 203 – Effect of proposal on non-designated heritage asset should be taken into account; a balanced judgement should have regard to scale of harm or loss and the significance of the heritage asset.

NPPF 131 - Trees make an important contribution to the character and quality of urban environments, and can also help mitigate and adapt to climate change. Planning decisions should ensure that new streets are tree-lined, that opportunities are taken to incorporate trees elsewhere in developments (such as parks and community orchards), that appropriate measures are in place to secure the long-term maintenance of newly-planted trees, and that existing trees are retained wherever possible.

London Plan Policy HC1Heritage Conservation and growth.

CS15 - Design

CS 16 – Heritage

DM30 – Urban design and local character

DM36 – CAs and LBs

DM37 – NDHAs

Recommendation:

Objection, revise

Potential revisions/amendments (if necessary):

See above.



Existing 2 storey buildings on Willow Way (as seen from Shrublands Close), plus additional set back structure on roof rises above William Wood House.



View from Kirkdale (within ASLC and in setting of the LBs) which shows the mature tree canopy of trees in Sydenham Park CA that will be obscured by this development.

Transport Comments

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

Flood Risk Comments

Review Summary

This application is proposing the following key items:

- Type of development: Major
- Flood risk: Low, Flood Zone 1
- Types of conveyance / attenuation features: Green roofs, permeable paving, attenuation tank.
- Runoff rate restriction (l/s): 2 l/s, this is greater than the greenfield rates, however provides significant betterment compared to the existing runoff rates. however within 3x greenfield rates .
- Runoff attenuation volume (m3): 159.6
- Maintenance plan: A maintenance plan has been provided, but with no tasks / frequencies for the green roofs. A maintenance owner has not been provided.

Recommendation and Requests

This application has not sufficiently demonstrated the use of the London Plan's drainage hierarchy. We object to the application for the following reasons:

- The applicant has not provided sufficient justification for the non-inclusion of rainwater harvesting techniques. The applicant should consider the use of water butts / raingardens.
- The applicant states on page 6 of the Surface Water Drainage Strategy Report that "Temporary storage will be provided within the attenuation tank to balance the volumes prior to discharge to the watercourse." However, elsewhere within the report, the proposed discharge is noted as being to the Thames Water combined sewer.
- The applicant states a proposed runoff rate of 2.0l/s in the 1 in 30-year storm. However, the calculations provided in Appendix H of the Surface Water Drainage Strategy Report show a discharge rate of 2.0l/s in the 1 in 30-year storm
- The applicant has not provided the greenfield runoff volume.
- The applicant has not clearly stated the proposed area and attenuation volume for each SuDS feature.

- The Surface Water Drainage Strategy Report lists a site area of 2,239m². However, the application form states an area of 7,251m².
- The drainage calculations only account for the impermeable area, and not the whole site area.
- The drainage calculations provided state that the "Half Drain Time has not been calculated as the structure is too full". The applicant is required to provide a drawing showing exceedance flows.
- The maintenance strategy does not contain the maintenance tasks and strategies for the green roofs.
- A maintenance owner has not been stated.
- Thames Water has not been consulted regarding the proposed connection to the combined sewer.

To address the above, please can the applicant submit information which:

- Demonstrates that they have considered smaller scale rainwater harvesting features.
- Confirms whether the proposed surface water discharge is to a watercourse or combined sewer, with consideration given to the statement in page 6 of the Surface Water Drainage Strategy Report.
- Ensures the proposed runoff rates listed in the report align with those detailed in the calculations.
- Provides the greenfield runoff volume.
- Clearly states the proposed area and attenuation volume for each SuDS feature. Clarifies the site area for the proposed development. Includes the whole site area in the drainage calculations, as infiltration is not being pursued as a method of surface water discharge.
- Demonstrates updates to the drainage calculations (detailing the changes made) to ensure the half-drain times are reduced to less than 24 hours, to ensure that the proposed drainage strategy will remain operational in the case of consecutive storm events. Demonstrates where the exceedance flows are on a drawing.
- Provides the maintenance tasks and strategies for the green roofs.
- States a maintenance owner.
- Demonstrates that Thames Water has been consulted regarding the proposed connection to the combined sewer.

Urban Design Comments	
Application reference	22/129789
Site Address	21- 57 WILLOW WAY (Site A)
Proposal	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
Officer	
Date	

Comments:
<p>Summary</p> <p>The proposal is not considered by urban design officers to meet seven out of ten of the characteristics of good design as set out in the National Design Guide (2021). The proposal, in its current form, would not be supported.</p> <hr/> <p>Context</p> <p><i>Test: does the proposal enhance its surroundings?</i></p> <ul style="list-style-type: none"> No convincing baseline analysis underpins the proposal, although site photographs and some high-level mapping of the existing buildings on and immediately adjacent to the site have been provided. Officers acknowledge that the current buildings are poor quality and haphazardly arranged, including several temporary storage units. The relationship to William Wood is assessed to be poor. While improvements to the existing boundary treatments have been suggested (reduction in height of the boundary retaining wall, mesh fences with planters, view to courtyard – although this would be obscured by the climbing plants), the height and mass of the proposal would have an overbearing impact on the care home, potentially cancelling out the enhancements The current pattern of use across the site has been studied but there is no record of consultation with the three businesses that will not be able to continue to function in the re-provided units. The emerging masterplan has been assessed to preserve but not enhance the current industrial and employment provision on the site (refer economy, jobs and partnerships comment), which is a requirement of the site allocation in the emerging local plan Townscape views have been mapped but not provided, so impact on the adjacent CA and NDHA cannot be assessed (refer conservation officer comment) <p><i>Officer comment: It has not been adequately shown how the proposal will enhance its surroundings. The applicant has not demonstrated an understanding or evaluation of the unique characteristics of the site</i></p>

Identity

Test: does the proposal embody a sense of local character? Is it attractive and distinctive?

- The DAS provides some reference to local material palettes/'local character' (page 23) and architectural styles (page 11) within the context, but does not assign value to these, aside from indicating that the existing industrial-use buildings on Parcel A have no architectural merit.
- The proposal introduces a step-change in scale from the immediate context, which gives the site a unique identity within the local area. This approach could be accepted if the proposal unlocks the potential of the site as identified in the emerging site allocation appraisal, and impact on the neighbouring properties can be shown to be mitigated
- The proposal makes use of contemporary forms with high quality robust materials which would be supported when paired with an architectural language that is coherent with the function of the site.

Officer comment: The proposed architectural articulation is not informed by the local context nor does it set itself apart from it in a meaningful way (i.e.: it is not assessed to be distinctive). The residential character of the upper floors appears to have informed the architecture of the ground floor, whereas the requirement for the development to be employment-led would have this relationship reversed, with a stronger ground floor identity that anchors the scheme to the public realm. While the proposal is not offensive in terms of the architectural articulation, it does not provide adequate interest for its scale. It is not supported.

Built form

Test: is the pattern of development proposed coherent?

- The emerging masterplan does not appear to be balanced in terms of provision of uses across the site allocation. A more refined, context-led layout might see a shift in residential density away from Parcel A towards the rear or centre of the site.
- Design development has not been shown and the emerging masterplan has not been through a rigorous testing process. As such it is hard to accept that the quantum of residential units for parcel A is appropriate, as evidence to support this is not provided.
- A reduction in units, alongside an exercise in maximising plan efficiency could provide the opportunity to introduce more cut backs and openings between the front and back of the site, reinstating a relationship with the Sydenham CA.
- A stepped building line could be supported where the blocks have reduced height, but these could be further emphasized to add depth and visual interest to the primary facade
- The public/private edge where the building meets the ground has not been well mediated, with loading bays obscuring views to the residential core entrances when approached from Kirkdale.
- No buffer zone/softening has been provided between the pavement and the hard edge of the building. More separation between the building and the road would be preferred

Officer comment: The proposed building form for Parcel A is assessed to lack coherence, with poor balance between solid/void, public/private, and commercial/residential use. The root of this issue is assumed to be the quantum of residential units proposed on this parcel of land. The built form, in terms of scale, mass and bulk, would not be supported in its current form.

Movement

Test: is the proposal accessible and is it easy to navigate?

- The emerging masterplan proposes improving connectivity of the site by reinstating a pedestrian path off Dartmouth Road; and widening Willow Way as well as making it into a one-way for vehicular movement. The viability of this has not been shown. The mews street is also proposed to be widened, but no vehicular connection through to Willow Way is proposed.
- For the employment floorspace workshop/studio space and small industrial units are proposed. On land parcel A the units are intended to be for light industrial use, which requires neither yard nor customer parking (as per GLA guidance on co-location). However, submitted visuals show lorries parked within the workshop spaces. The 6m height also indicates that the design intention is for more industrial type activities, rather than office/storage space.
- Two loading bays are provided to service all the proposed workshop spaces as well as the residential units
- Vehicles currently use the pavements along Willow Way and the mews street to park. No mention has been made of where these displaced vehicles will go
- Level access along the ground floor is supported

Officer comment: The proposal fails to address where displaced vehicles will park, how vehicular access to the workshops and studios will work, and how the proposal will generally be serviced.

There is a potential for vehicles to dominate the public realm with the application as it stands, and as such it is not supported.

Environment

Test: has access to nature been enhanced and optimised?

- A tree survey has been conducted. 5 small trees to the eastern/front façade are recommended for removal. Hand excavations are proposed for minimal root disturbance to the large Grade B trees on the north and south boundaries, which are also recommended to be heavily pruned back to allow for the development
- The scale of the development means that views of the tree canopy through Willow Way will be obscured, and trees to the front elevation of the proposal are to be removed. Street trees have not been incorporated into the design. This is not supported and officers would require the trees removed on Willow Way to be re-provided to improve public realm and reinstate views of a tree canopy through the site
- The proposal includes a courtyard garden to the rear of the site, adjoining the William Wood care home. No clear use for this site has been established, except as a 'wildlife friendly, visually attractive space' with some parking and cycle storage. Given no yard space is provided to the industrial units which open out onto this space via roller shutters, there is a risk that this garden could become a dumping ground for industrial scrap.
- The proposal for Site A includes 3 roof terraces which are one level lower than the residential units adjacent. They have a mix of play space, planting, and seating for quiet space. The north and south gardens are designated for 0-4 year old play; and the central garden is designated for 4-11 year old play. 12+ year old play is to be provided off-site. Provided that the planting to the edges of the terraces provides adequate screening for the privacy of adjacent neighbours, this approach is supported.
- Urban greening factor is met/exceeded

Officer comment: The roof terraces appear to be visually attractive with high quality play spaces which would be supported. Additional greening and softening would be required to the front façade of the buildings (provide as a condition). The use of the courtyard space needs to be more clearly defined to avoid it becoming an eye sore (provide as a condition)

Public Spaces

Test: is the public realm safe, social, and inclusive?

- The emerging masterplan envisions public realm improvements to be offered in the form of a widened road (Willow Way) becoming a one-way traffic system to give more space over to pedestrians, cyclists, loading and parking. However, this is dependent on the development of parcel B and C, whose frontage is to become the widened public way.
- Amenity spaces are mostly above ground (in emerging masterplan amenity space is provided on 1F podium level; in proposal amenity space is provided at 4th floor roof level and behind Willow Way façade on GF). There is no public access to these green spaces.
- Passive surveillance with the introduction of residential use will increase safety of the street at night, which would be an improvement that would be supported
- No provision for public furniture, pause spaces or street trees has been made on Parcel A

Officer comment: Public Realm improvements rely solely on Parcel B+C being developed. The proposed development on Parcel A should be reconfigured to introduce an element of public realm within the proposal; or the development of Parcel A, B, and C should be assessed holistically through a combined application.

Uses

Test: Is the proposal appropriate in context and does it contain mixed and integrated uses?

- The applicant has shown how the commercial spaces can be adapted over time with clean floor plates and the ability to customise mezzanine space. This strategy is supported, subject to the units being shown to be fit for purpose in terms of servicing and access
- The residential component has a tenure split of 50% affordable homes which is supported
- The access to the upper floors, which contain residential units, are via two cores, each containing two lifts and a stair. 8 apartments lead off each core on each floor via a long corridor. No separate fire lobby is proposed. These design decisions are not considered best practice and would be resisted.
- The north and south roof gardens (both containing 0-4 year old play) are to have limited access. This may create a barrier to integration, as the north garden would service the market housing while the south garden would service the social housing. An improved access strategy for the shared amenity spaces should be achieved to avoid segregation of tenures

Officer comment: A reduction in residential units on Parcel A may create opportunities for better residential access cores on the ground floor and an improved user journey to their front door. As it stands, the communal spaces for residential users are not considered to be integrated sufficiently to be supported.

Homes and buildings

Test: are the layouts functional, healthy and sustainable?

- The applicant has proposed a 50:50 split between affordable (south block) and market (north block) homes. A significant amount of these units are studios and one bedrooms (40%)
Market: 3xstudio; 7x1b2p; 17x2b4p; 3x3b6p
Affordable: 1xstudio; 13x1b2p; 1x2b3p; 7x2b4p; 6x3b5p; 2x3b6p
- 40% of the units are single aspect
- Many of the flat layouts are inefficiently planned. A repeating issue appears to be the size and shape of (particularly) secondary bedrooms. Narrow rooms with wall-to-wall windows make internal storage in these bedrooms very difficult. Long corridors in the family units are also considered a problem in planning terms. These appear to be a result of the long, narrow planform on the south side of the site.
- External amenity spaces on the 4th floor (roof terrace) provide opportunities for comfort, relaxation and stimulation - including play - for residents, which is in line with NDG and is supported. However, passive surveillance to these spaces could be improved through the placements of windows overlooking these areas, as well as a more generous communal lobby with clear sight lines through to the gardens
- Daylight/sunlight in some of the habitable rooms is below the acceptable threshold (in terms of BRE compliance). While it is accepted that compromise will be required in higher density development, a reduction in density should have been tested to provide excellent sunlight and daylight to all units
- Bins and cycle storage is provided on the ground floor with access off Willow Way.

Officer comment: the internal arrangements of the residential units are not considered to be optimal. Studio apartments will generally be resisted as they are not considered to provide a long-term, sustainable solution for meeting Lewisham's housing needs. Further refinement of the internal layouts, including a re-working of the internal shared circulation spaces, would be required for the proposal to gain support in design terms.

Resources

Test: is the proposal efficient and resilient?

- The fabric first approach is supported, with improved insulation to meet the London Plan requirements
- ASHPs are supported to reduce the energy requirements of the scheme, but their location on the external amenity spaces of the residential units will be strongly resisted, unless it can be shown that they will be adequately screened from view, acoustically isolated, a clear maintenance strategy is provided, and it is proven that none of these requirements will reduce the area of the terraces to below what is acceptable in London Plan terms
- Cladding materials are robust and will require little maintenance. This is supported

Officer comment: the proposal makes fair use of the site's natural resources and proposed energy reductions in line with London Plan requirements. It could be supported.

Lifespan:

Test: will the proposal be made to last?

- The commercial floor plans appear to present a reasonable amount of flexibility to be adapted over time
- The residential units could benefit from further plan rationalisation to maximise adaptability over time.

Officer comment: on balance, the proposal could be assessed to meet the requirements of being built to last

Relevant Policies:

National Planning Policy Framework 2021

National Design Guide (NDG) 2021

The London Plan 2021 (D6; P38)

The London Housing SPG

LB Lewisham Local Plan 2014 (DM25, DM30, DM32, DM33)

LB Lewisham Core Strategy 2010

Recommendation:**Refuse****Potential revisions/amendments (if necessary):**

DRP review, masterplan to be more rigorously tested together with Council, re-design once proposal can be truly plan-led



Gareth Clegg
Lewisham Planning Department
Laurence House 3rd Floor
1 Catford Road
Catford
London
SE6 4RU



Your ref: DC/22/129789

Our ref: SE5614

Date:16/01/2023

RE: 21- 57 WILLOW WAY, LONDON, SE26 4QP

Dear Gareth,

Thank you for your correspondence dated 16th January 2023, allowing me to make comment on planning application reference DC/22/129789 for the: **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**

Please note, as stated within pages 83 to 85 of the Design and Access Statement, I have met with the design team regarding this proposal. The meeting was positive with solutions put forwards from both sides to resolve possible crime generators.

The proposal sits in an area of opportunity for regeneration on land that is currently commercial/light industrial.

On looking at the plans there are many positives. There is good separation between the different functions of the building with the bin store, bike stores and service rooms having clear separation. There are no grey areas of responsibility and clear boundaries throughout the site. There appears to be good sight lines and active frontage for both the proposed commercial space and residential. There is likely to be an increase in natural surveillance onto Willow Way, which can assist in lowering instances of crime.

Whilst these positives are welcome, a building can only be effective if the correct products are installed. This is where SBD and Designing Out Crime Officers (DOCO's) are able to assist the design team to ensure the correctly specified product are installed, that lighting standards within public realm are to BS5489-1:2020 and that this lighting scheme has been designed/signed off by someone suitably qualified.

To achieve these standards, I respectfully ask that a Secured by Design condition is placed on this development.

Achieving Secured By Design should be welcomed, especially as this development is in a high crime area. Lewisham is a high crime borough it had the 15th highest recorded crime figures within London's 32 boroughs, suffering from incidents of Burglary, Robbery, Assaults including violent crime and knife crime, Criminal Damage, Motor Vehicle Crime, Theft, gang crime, and Anti-Social Behaviour including drugs. Open source checks www.police.uk show that Forest Hill ward, where this development sits, had 1,524 recorded crimes between December 2021 and November 2022. (Source www.police.uk) Within those crime types were high levels of ASB, Violence and Sexual Offences, vehicle crime, arson and criminal damage among other crimes.

To assist the design team in achieving the correct standards under the relevant and appropriate guidelines. I strongly recommend that, should this application be granted, the design team continue discussions with a Design Out Crime Officer to ensure that SBD recommendations are complied with. This is important, especially given the guidance within NPPF sections 8 and 12 which state:-

Section 8 of National Planning Policy Framework states, 'Planning policies and decisions should aim to achieve healthy, inclusive and safe places which are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion...'

Section 12 of National Planning Policy Framework states, 'Planning policies and decisions should ensure that developments create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.'

And the latest publication of The London Plan -

The London Plan 2021, Paragraph 3.11.3 states, 'Measures to **design out crime**, including counter terrorism measures, should be integral to development proposals and considered early in the design process, taking into account the principles contained in guidance such as the Secured by Design Scheme published by the Police.... This will ensure development proposals provide adequate protection, do not compromise good design, do not shift vulnerabilities elsewhere, and are cost-effective. Development proposals should incorporate measures that are proportionate to the threat of the risk of an attack and the likely consequences of one.'

If this application is granted, I request that the development uses the Secured By Design principles and standards in respect of the security of each property. This is alongside continued consultation throughout the design and build of this development with the South East Designing Out Crime Office to ensure that Secured by Design standards are implemented correctly.

Achieving Secured By Design would ensure the **Draft Lewisham Local Plan's** Objectives are hit in respect of –

A Thriving Local Economy that Tackles Inequalities – Designing Out Crime Officers base their recommendations on risk and crime types. This means that the same security standards would be advised whether the development be for general sale, affordable homes, part rent-part buy, housing association, social housing or a large block that has a mixture of tenures. This means that every resident, no matter their background or financial circumstances, will be in a property where the same, high quality, third party tested and accredited security rated products have been used.

A Greener Borough & Climate Emergency – The environmental benefits of SBD are supported by independent academic research, which conservatively estimates the carbon cost of crime within the UK to be in the region of 6,000,000 tonnes of CO2 per annum. This is roughly equivalent to the total CO2 output of 6 million UK homes.

This research also shows that SBD housing developments experience up to 87% less burglary, 25% less vehicle crime and 25% less criminal damage (Note 1.4). It also has a significant impact on anti-social behaviour. Therefore, there are substantial carbon cost savings associated with building new homes and refurbishing existing homes to the SBD standard i.e. less replacement of poor quality doors, windows and the stolen property from within the home as a result of criminal acts. This has been achieved through adherence to well researched and effective design solutions, innovative and creative product design coupled with robust manufacturing standards. Research documentation can be found on the SBD website.

Healthy & Safe Communities – Communities that do not have regular occurrences of crime are healthier and safer, lower crime rates encourage a community to thrive. Designing Out Crime Officers also look at the likely end users for each proposed building, any further concerns are addressed meaning that the most vulnerable people in society are afforded a level of security that lowers the chances of them becoming a victim of crime.

Ensuring High Quality Education, Health & Social Care – Secured By Design and Designing Out Crime Officers cover schools, hospitals, care homes and many other community/publically accessible buildings. If the staff within these buildings feels safe, they can further concentrate on delivering high standards of education and health care.

This development is suitable to achieve Secured By Design accreditation, if this application is granted I ask for the following worded conditions be met:

- 1. Before any above ground work hereby authorised begins, details of security measures shall be submitted and approved in writing by the Local Planning Authority and any such security measures shall be implemented prior to occupation in accordance with the approved details which shall be in line with the standards set out by 'Secured by Design'.**
- 2. Prior to the first occupation of the units hereby consented, confirmation that the standards recommended by Secure by Design for that building has been achieved shall be submitted to and approved in writing by the Local Planning Authority. The approved SBD standards set out and approved shall be maintained in perpetuity thereafter.**

I would encourage the planning authority to note the experience gained by the UK police service over the past 30 years in this specific subject area. That experience has led to the provision of a physical security requirement considered to be more consistent than that set out within Approved Document Q of the Building Regulations (England); specifically the recognition of products that have been tested to the relevant security standards but crucially are also fully certificated by an independent third party, accredited by UKAS (Notified Body). This provides assurance that products have been produced under a controlled manufacturing environment in accordance with the specifiers aims and minimises misrepresentation of the products by unscrupulous manufacturers/suppliers and leads to the delivery, on site, of a more secure product. For a complete explanation of certified products please refer to the Secured by Design guidance documents which can be found on the website www.securedbydesign.com.

I trust these comments are of assistance and I request to be kept informed as to the status of this development.

Yours sincerely,

A solid black rectangular box used to redact the signature and name of the sender.

[REDACTED]

From: [REDACTED]
Sent: 17 January 2023 10:01
To: Planning
Subject: RE: Planning Application at 21- 57 WILLOW WAY, LONDON, SE26 4QP

Dear Sir/Madam,

Thank you for your email in relation to the above application.

HSE is the statutory consultee for planning applications that involve or may involve a relevant building.

Relevant building is defined as:

- contains two or more dwellings or educational accommodation and
- meets the height condition of 18m or more in height, or 7 or more storeys

“Dwellings” includes flats, and “educational accommodation” means residential accommodation for the use of students boarding at a boarding school or in later stages of education (for definitions see article 9A (9) of the Town and Country Planning Development Management (England) Procedure Order 2015 as amended by article 4 of the 2021 Order.

However, from the information you have provided for this planning application, it does not appear to fall under the remit of planning gateway one because it does not meet the height requirements.

Further information is available on the HSE website [here](#).

Once again thank you for your email, if you require further advice with regards to this application, please do not hesitate to contact the planning gateway one team quoting our reference number (pgo-2618) in all future correspondence.

Kind Regards

[REDACTED]

From: Planning@lewisham.gov.uk <Planning@lewisham.gov.uk>

Sent: 16 January 2023 10:10

Subject: Planning Application at 21- 57 WILLOW WAY, LONDON, SE26 4QP

Dear Planning Application Consultee,

Please follow the instructions in the table to view the full list of documents relating to this case.

This will, we hope, make it simpler for you to review all of the documents relating to the application you're being consulted on.

Kind regards

Lewisham Planning

Lewisham Planning Consultation	
Application No	DC/22/129789
Location	21- 57 WILLOW WAY, LONDON, SE26 4QP
Case Officer	Gareth Clegg
Proposal	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
Closing Date for Comments	13 February 2023
Contact Email	Planning@Lewisham.gov.uk
Link	Click here to view the application online Alternatively copy & paste the link below into your browser http://planning.lewisham.gov.uk/online-applications/applicationDetails.do?activeTab=summary&keyVal= LEWIS DCAPR 117711

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www.hse.gov.uk

[REDACTED]

From: [REDACTED]
Sent: 17 January 2023 10:23
To: Planning
Subject: RE: Planning Application at 21- 57 WILLOW WAY, LONDON, SE26 4QP
Attachments: 17-08-16 External Consultation Checklist v3.3 update.pdf

FAO Gareth Clegg

Dear Gareth,

We have no comments to make on this planning application as it falls outside our remit as a statutory planning consultee. Please refer to the attached 'When to consult the Environment Agency' document for guidance on when to consult us.

Non planning consents

Although we have no comments on this planning application, the applicant may be required to apply for other consents directly from us. The term 'consent' covers consents, permissions or licenses for different activities (such as water abstraction or discharging to a stream), and we have a regulatory role in issuing and monitoring them.

The applicant should contact 03708 506 506 or consult our website (<https://www.gov.uk/guidance/check-if-you-need-an-environmental-permit>) to establish whether a consent will be required.

Best regards,

[REDACTED]

From: Planning@lewisham.gov.uk <Planning@lewisham.gov.uk>
Sent: 16 January 2023 10:10

[REDACTED]

Subject: Planning Application at 21- 57 WILLOW WAY, LONDON, SE26 4QP

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From: [REDACTED]
Sent: 17 January 2023 13:19
To: Planning
Subject: 3rd Party Planning Application - DC/22/129789

London Borough of Lewisham
Planning Service
Fifth Floor, Laurence House
1 Catford Road
London
SE6 4SW

Our DTS Ref: 74298
Your Ref: DC/22/129789

17 January 2023

Dear Sir/Madam

Re: 21-57, WILLOW WAY, LONDON, -, SE26 4QP

Waste Comments

There are public sewers crossing or close to your development. If you're planning significant work near our sewers, it's important that you minimize the risk of damage. We'll need to check that your development doesn't limit repair or maintenance activities, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes.

[https://urldefense.com/v3/__https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes__!!CVb4j_0G!RhXgMcBvDnBKsHnXU4qw6cFVAU7ZdpEd0Gcf3ngzJs7ChpbUyia_4SH4s5VadiZWTPHR61sVWtZND1tbl9aPAwEPLCpAhA\\$](https://urldefense.com/v3/__https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes__!!CVb4j_0G!RhXgMcBvDnBKsHnXU4qw6cFVAU7ZdpEd0Gcf3ngzJs7ChpbUyia_4SH4s5VadiZWTPHR61sVWtZND1tbl9aPAwEPLCpAhA$)

The proposed development is located within 15 metres of our underground waste water assets and as such we would like the following informative attached to any approval granted. "The proposed development is located within 15 metres of Thames Waters underground assets and as such, the development could cause the assets to fail if appropriate measures are not taken. Please read our guide 'working near our assets' to ensure your workings are in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures.[https://urldefense.com/v3/__https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-near-or-diverting-our-pipes__!!CVb4j_0G!RhXgMcBvDnBKsHnXU4qw6cFVAU7ZdpEd0Gcf3ngzJs7ChpbUyia_4SH4s5VadiZWTPHR61sVWtZND1tbl9aPAwGuqgswg\\$](https://urldefense.com/v3/__https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-near-or-diverting-our-pipes__!!CVb4j_0G!RhXgMcBvDnBKsHnXU4qw6cFVAU7ZdpEd0Gcf3ngzJs7ChpbUyia_4SH4s5VadiZWTPHR61sVWtZND1tbl9aPAwGuqgswg$) . Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk Phone: 0800 009 3921 (Monday to Friday, 8am to 5pm) Write to: Thames Water Developer Services, Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB

With regard to SURFACE WATER drainage, Thames Water would advise that if the developer follows the sequential approach to the disposal of surface water we would have no objection. Management of surface water from new developments should follow Policy SI 13 Sustainable drainage of the London Plan 2021. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. Should you require further information please refer to our website.

https://urldefense.com/v3/__https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-

pipes__;!!CVb4j_0G!RhXgMcBvDnBKsHnXU4qw6cFVAU7ZdpEd0Gcf3ngzJs7ChpbUyia_4SH4s5VadiZWTPHR61sVWtZND1tbl9aPAwEPLCpAhA\$

We would expect the developer to demonstrate what measures will be undertaken to minimise groundwater discharges into the public sewer. Groundwater discharges typically result from construction site dewatering, deep excavations, basement infiltration, borehole installation, testing and site remediation. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. Should the Local Planning Authority be minded to approve the planning application, Thames Water would like the following informative attached to the planning permission: "A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 020 3577 9483 or by emailing trade.effluent@thameswater.co.uk. Application forms should be completed on line via [https://urldefense.com/v3/__http://www.thameswater.co.uk__;!!CVb4j_0G!RhXgMcBvDnBKsHnXU4qw6cFVAU7ZdpEd0Gcf3ngzJs7ChpbUyia_4SH4s5VadiZWTPHR61sVWtZND1tbl9aPAwER0ny2gw\\$](https://urldefense.com/v3/__http://www.thameswater.co.uk__;!!CVb4j_0G!RhXgMcBvDnBKsHnXU4qw6cFVAU7ZdpEd0Gcf3ngzJs7ChpbUyia_4SH4s5VadiZWTPHR61sVWtZND1tbl9aPAwER0ny2gw$). Please refer to the Wholesale; Business customers; Groundwater discharges section.

Thames Water would advise that with regard to WASTE WATER NETWORK and SEWAGE TREATMENT WORKS infrastructure capacity, we would not have any objection to the above planning application, based on the information provided.

Water Comments

If you are planning on using mains water for construction purposes, it's important you let Thames Water know before you start using it, to avoid potential fines for improper usage. More information and how to apply can be found online at thameswater.co.uk/buildingwater.

On the basis of information provided, Thames Water would advise that with regard to water network and water treatment infrastructure capacity, we would not have any objection to the above planning application. Thames Water recommends the following informative be attached to this planning permission. Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.

Yours faithfully
Development Planning Department

Development Planning,
Thames Water,
Maple Lodge STW,
Denham Way,
Rickmansworth,
WD3 9SQ
Tel:020 3577 9998
Email: devcon.team@thameswater.co.uk

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From: [REDACTED]
Sent: 19 January 2023 14:07
To: Clegg, Gareth
Subject: RE: Planning Application at 21- 57 WILLOW WAY, LONDON, SE26 4QP

Dear Sir/Madam,

Thank you for your email in relation to the above application.

HSE is the statutory consultee for planning applications that involve or may involve a relevant building.

Relevant building is defined as:

- contains two or more dwellings or educational accommodation and
- meets the height condition of 18m or more in height, or 7 or more storeys

“Dwellings” includes flats, and “educational accommodation” means residential accommodation for the use of students boarding at a boarding school or in later stages of education (for definitions see article 9A (9) of the Town and Country Planning Development Management (England) Procedure Order 2015 as amended by article 4 of the 2021 Order).

However, from the information you have provided for this planning application, it does not appear to fall under the remit of planning gateway one because it does not meet the height requirements.

Please see below how we measure buildings.

Measuring height of building for planning gateway one:

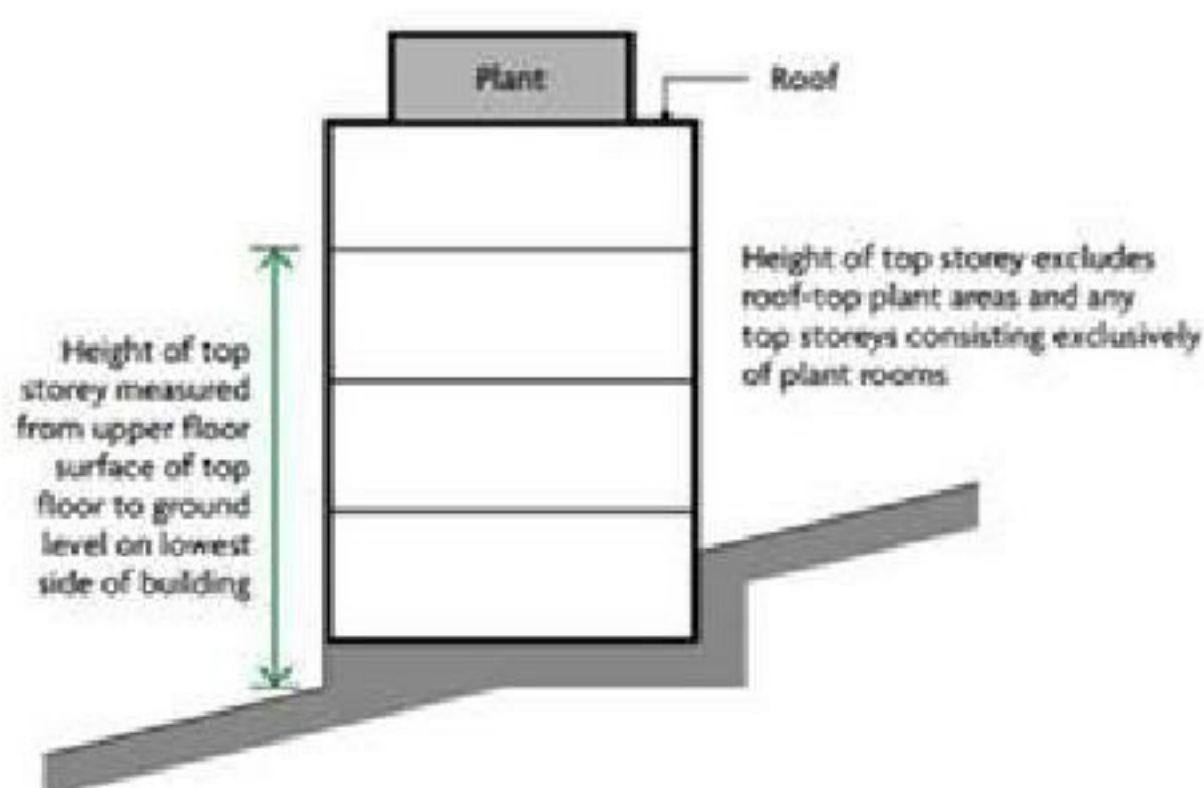


Diagram measuring height of building for planning gateway one shows that the height should be measured from the upper floor surface of the top floor to ground level on the lowest side of the building. Excluding roof top plant areas and any top storeys consisting exclusively of plant rooms.

Further information is available on the HSE website [here](#).

Once again thank you for your email, if you require further advice with regards to this application, please do not hesitate to contact the planning gateway one team quoting our reference number (pgo-2618) in all future correspondence.

Kind Regards

From: Clegg, Gareth <Gareth.Clegg@lewisham.gov.uk>

Sent: 18 January 2023 17:11

To: [REDACTED]

Subject: Planning Application at 21- 57 WILLOW WAY, LONDON, SE26 4QP

Your reference number: pgo-2618

Dear Sir / Madam,

We have received the attached response to our recent consultation to the HSE under Planning Gateway One, which states that from the information provided for this planning application, it does not appear to fall under the remit of Planning Gateway One because it does not meet the height requirements

For the avoidance of doubt, the proposed building comprises 60 dwellings and has a maximum height of **19.82m**, as confirmed within the planning application form, see extract below:

Building reference:

Site A

Maximum height (Metres):

19.82

Number of storeys:

5

This is also reflected on the submitted drawings, see my annotated measurement below:



Our understanding is that the proposed development does therefore fall within the remit of Planning Gateway One.

I would therefore be grateful if you could revisit your assessment of this application.

Regards,

Gareth

Gareth Clegg
Principal Planning Officer - Development Management
Planning Service
Housing, Regeneration and Public Realm
Lewisham Council

Direct line: 020 8314 8036 (ext. 48036)

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Please visit the HSE website at the following address to keep yourself up to date

www.hse.gov.uk

From: planningpa@lewisham.gov.uk
Sent: 22 January 2023 16:23
To: Planning
Subject: Comments for Planning Application DC/22/129789

Comments summary

Dear Sir/Madam,

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 22/01/2023 4:26 PM from [REDACTED]

Application Summary

Address: 21- 57 WILLOW WAY, LONDON, SE26 4QP

Proposal: 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

Case Officer: Gareth Clegg

[Click for further information](#)

Customer Details

Name: [REDACTED]

Email: [REDACTED]

Address: [REDACTED]

Comments Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Reasons for comment:

Comments:

[REDACTED]
I am making an objection on the grounds that my property was not considered in the Daylight Sunlight and Overshadowing Assessment and I believe it should have been.

[REDACTED] There are no buildings between the site of the proposed development [REDACTED] and it currently receives direct sunlight from the east in the location of the proposed development. I expect that the development will therefore cause noticeable loss of daylight and sunlight [REDACTED]

██████████ in breach of the BRE Guidelines. There is a completely inadequate explanation for excluding ██████████ from the assessment.

On that basis, I would like to request a revised Daylight Sunlight and Overshadowing Assessment which incorporates ██████████. ██████████ will also be affected and should be assessed too.

Upon receipt of the revised assessment I request that I am reconsulted to provide an opportunity to comment properly on the daylight and sunlight effects ██████████

Kind regards

[REDACTED]

From: [REDACTED]
Sent: 22 January 2023 16:26
To: Planning
Cc: Davis, Cllr Sophie
Subject: PP-11767232, DC/22/129789, 21-57 Willow Way

To Lewisham Planning Team,

For the attention of the relevant case officer regarding PP-11767232, DC/22/129789, 21-57 Willow Way.

I am writing with respect to the planning application listed above for Willow Way, SE26. [REDACTED]
[REDACTED]

I am making an objection on the grounds [REDACTED] was not considered in the Daylight Sunlight and Overshadowing Assessment and I believe it should have been.

[REDACTED] There are no buildings between the site of the proposed development [REDACTED] and it currently receives direct sunlight from the east in the location of the proposed development. I expect that the development will therefore cause noticeable loss of daylight and sunlight to my property in breach of the BRE Guidelines. There is a completely inadequate explanation for excluding [REDACTED]

On that basis, I would like to request a revised Daylight Sunlight and Overshadowing Assessment which incorporates [REDACTED] will also be affected and should be assessed too.

Upon receipt of the revised assessment I request that I am reconsulted to provide an opportunity to comment properly on the daylight and sunlight effects [REDACTED]

Many thanks,
[REDACTED]

[REDACTED]

From: [REDACTED]
Sent: 23 January 2023 13:40
To: Planning
Cc: Davis, Cllr Sophie
Subject: PP-11767232, DC/22/129789, 21-57 Willow Way

To whom it may concern,

I am writing in regards to objecting "PP-11767232, DC/22/129789, 21-57 Willow Way" and the proposed planning application.

The proposed site is around 50m [REDACTED]
[REDACTED] While I am not against re-developing the area, I do believe that the height of the development will affect the amount of natural daylight [REDACTED] – hence my objection to the application.

I have noticed that all the properties along the stretch of Dartmouth Road (from the Bricklayers arms around to the top of Kirkdale) were excluded from the Daylight Sunlight and Overshadowing Assessment – and I believe [REDACTED] [REDACTED] should have been included in order to give a transparent overview of the effect to ALL of the surrounding properties. There are no buildings between [REDACTED] (like majority on that stretch of road) [REDACTED], I do rely on daylight [REDACTED]

I would appreciate if an addendum could be added to the assessment to include [REDACTED] in order for [REDACTED] [REDACTED] to comment fairly on the redevelopment.

Kind regards

[REDACTED]

From: planningpa@lewisham.gov.uk
Sent: 25 January 2023 15:57
To: Planning
Subject: Comments for Planning Application DC/22/129789

Comments summary

Dear Sir/Madam,

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 25/01/2023 4:00 PM from [REDACTED]

Application Summary

Address: 21- 57 WILLOW WAY, LONDON, SE26 4QP

Proposal: 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

Case Officer: Gareth Clegg

[Click for further information](#)

Customer Details

Name: [REDACTED]

Email: [REDACTED]

Address: [REDACTED]

Comments Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Reasons for comment:

Comments:

The development site this application refers to is approximately 60/70m [REDACTED]
[REDACTED] There are no buildings between the proposed development [REDACTED]
[REDACTED] currently receives direct sunlight in the location of the proposed development. I expect that the development will therefore cause a noticeable loss of daylight and sunlight [REDACTED] in breach of the BRE Guidelines. And I would like to make an objection due to the fact [REDACTED] was not considered in the Daylight Sunlight and Overshadowing Assessment. No explanation has been provided as to [REDACTED] was excluded from the assessment.

Therefore, I would like to request a revised Daylight Sunlight and Overshadowing Assessment which incorporates [REDACTED]

Kind regards

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Economy, Jobs and Partnerships – planning application comments

Application reference	DC/22/129789
Proposal	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.
Address	21- 57 Willow Way, London, SE26 4QP
Officer	
Date	26/01/2023

Comments

The Council's Head of Service for Economic Development has the following comments on the application.

The proposed redevelopment of this site provides an opportunity to improve the quality of the commercial workspace available in this area.

The site is within a Local Employment Location (LEL) as designated by the current Local Development Plan, and within a Locally Significant Industrial Site (LSIS) as designated by the emerging new Local Plan. As such it is vital that this site has its commercial uses protected and enhanced where possible.

Overall the design of the scheme and the proposed three units appear to offer a positive contribution to the local economy. It is anticipated there will be reasonable demand for these units if built. The marketing strategy for the units gives initial priority to local businesses or workspace operators and this is welcomed. Should the development proceed, the Council's Economy, Jobs and Partnerships service will be willing to assist with the marketing and promotion of the units to local businesses and operators.

However, there are some issues which could require further consideration by the applicant.

Firstly, the emerging new Local Plan suggests an indicative development capacity of 6,705sqm of commercial floorspace from the wider LSIS in which this site is situated. Whilst the small net gain of commercial workspace in this proposal is welcomed and the potential additional jobs through alternative commercial uses, it is suggested there

is potential to provide a higher level of commercial workspace and therefore jobs through this development. The West Area Place Principles in the new Local Plan state that *"comprehensive redevelopment of sites within Willow Way LSIS will be supported where this retains and enhances industrial capacity and local employment provision"*. This current proposal appears to satisfy the retention of industrial capacity, but does not enhance it. Furthermore, the Emerging Outline Masterplan provided as part of the supporting documentation estimates the commercial floorspace available in total from the proposed redeveloped site in total. The total floorspace proposed, including this development, falls well short of the 6,705sqm indicative development capacity at just 4,762sqm. This demonstrates that this proposed site should be proposing a higher level of commercial space.

Secondly, there appears to be three businesses who will be forced to relocate by the proposed development. It is unclear whether these businesses have been consulted in the development of this proposal. There is no detail provided in either the Statement of Community Involvement or Employment and Marketing Strategy.

Whilst there is likely to be some statutory compensation owing to those businesses from the termination of leases etc should this development go ahead, the businesses will still be faced with costs from the practical costs of moving their business (e.g. removals, taking on new leases) and establishing their business in a new location (e.g. marketing). It is reasonable to ask the landowner to contribute to these costs given that the proposed development will be the cause. If the businesses are not supported there is a risk that the redevelopment would put these businesses and jobs under threat.

Finally, in line with the requirements of the Planning Obligations SPD, obligations should be sought to secure employment and business opportunities arising from the redevelopment. This should be both during the construction and end-use phases of the redevelopment. The Local Labour and Business Scheme can help calculate the levels of contributions appropriate to the scale of the development proposed.

Based on the above, it is suggested that should planning permission be granted then the following planning conditions should be required:

- A package of support to be paid for by the landowner which provides practical help and support for existing businesses to find alternative commercial premises, either temporary or permanent. This should include a mixture of financial support and professional advice;
- Section 106 financial obligations for employment & training and Local Labour and Business Scheme, along with non-financial obligations relating to local labour and business opportunities during the construction and end-use phases.

[REDACTED]

From: [REDACTED]
Sent: 24 January 2023 16:15
To: Clegg, Gareth
Cc: [REDACTED]
Subject: 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

Hello Gareth,

I have started today at Lewisham and will be undertaking Planning Consultations, predominantly in respect of acoustics, on behalf the Environmental Protection Team. For expediency, whilst I sort out email sign offs etc. I am responding in respect of:

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

I note the acoustic submission prepared by 24 Acoustics ref. R9784-1 Rev 1 which reports at Section 5.8:

‘External communal amenity spaces are proposed on the east side of the new building at ground floor level and in three roof terrace areas on the fourth floor. The noise measurement results indicate that external noise levels within all the communal amenity spaces would be comfortably below 55 dB LAeq, 16 hour and therefore acceptable’.

However, from the data presented at Table 1 - Measured Noise Levels at Location 1 – Overlooking High Street the representative daytime (LAeq16hr) is reported as 59dB i.e. in excess of the value above. Further, with the Planning Statement dated 20th December 2022 states:

‘The amenity space provided for the residential element of the Proposed Development comprises private balconies for each unit plus communal open space located on the 4th floor’.

As such is it possible to seek clarification from the Applicant’s Acoustic Consultant as to why it appears the data presented in Table 1 has been ‘screened out’ and reliance placed upon the data presented in Table 2 or provide details of any additional mitigation measures proposed.

Moving on, Section 5.11 of the acoustic submission states:

‘The daytime and night-time plant noise level criteria, for new plant associated with the development, are shown in Table 5 below’.

It would appear this is a typo and should refer to Table 4. However, it is unclear the basis of the Plant Noise Limits presented i.e. are the lowest values or representative L90 values used to derive the values.

Whilst I have no adverse comment in respect of the Mitigation and Glazing albeit, I would also seek to condition internal noise levels for the proposed MVHR, in the absence of clarity in respect of the matters raised above I am currently unable to comment further at present.

Regards

[REDACTED]

Economy, Jobs and Partnerships – planning application comments

Application reference	DC/22/129789
Proposal	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.
Address	21- 57 Willow Way, London, SE26 4QP
Officer	
Date	26/01/2023

Comments

The Council's Head of Service for Economic Development has the following comments on the application.

The proposed redevelopment of this site provides an opportunity to improve the quality of the commercial workspace available in this area.

The site is within a Local Employment Location (LEL) as designated by the current Local Development Plan, and within a Locally Significant Industrial Site (LSIS) as designated by the emerging new Local Plan. As such it is vital that this site has its commercial uses protected and enhanced where possible.

Overall the design of the scheme and the proposed three units appear to offer a positive contribution to the local economy. It is anticipated there will be reasonable demand for these units if built. The marketing strategy for the units gives initial priority to local businesses or workspace operators and this is welcomed. Should the development proceed, the Council's Economy, Jobs and Partnerships service will be willing to assist with the marketing and promotion of the units to local businesses and operators.

However, there are some issues which could require further consideration by the applicant.

Firstly, the emerging new Local Plan suggests an indicative development capacity of 6,705sqm of commercial floorspace from the wider LSIS in which this site is situated. Whilst the small net gain of commercial workspace in this proposal is welcomed and the potential additional jobs through alternative commercial uses, it is suggested there

is potential to provide a higher level of commercial workspace and therefore jobs through this development. The West Area Place Principles in the new Local Plan state that *"comprehensive redevelopment of sites within Willow Way LSIS will be supported where this retains and enhances industrial capacity and local employment provision"*. This current proposal appears to satisfy the retention of industrial capacity, but does not enhance it. Furthermore, the Emerging Outline Masterplan provided as part of the supporting documentation estimates the commercial floorspace available in total from the proposed redeveloped site in total. The total floorspace proposed, including this development, falls well short of the 6,705sqm indicative development capacity at just 4,762sqm. This demonstrates that this proposed site should be proposing a higher level of commercial space.

Secondly, there appears to be three businesses who will be forced to relocate by the proposed development. It is unclear whether these businesses have been consulted in the development of this proposal. There is no detail provided in either the Statement of Community Involvement or Employment and Marketing Strategy.

Whilst there is likely to be some statutory compensation owing to those businesses from the termination of leases etc should this development go ahead, the businesses will still be faced with costs from the practical costs of moving their business (e.g. removals, taking on new leases) and establishing their business in a new location (e.g. marketing). It is reasonable to ask the landowner to contribute to these costs given that the proposed development will be the cause. If the businesses are not supported there is a risk that the redevelopment would put these businesses and jobs under threat.

Finally, in line with the requirements of the Planning Obligations SPD, obligations should be sought to secure employment and business opportunities arising from the redevelopment. This should be both during the construction and end-use phases of the redevelopment. The Local Labour and Business Scheme can help calculate the levels of contributions appropriate to the scale of the development proposed.

Based on the above, it is suggested that should planning permission be granted then the following planning conditions should be required:

- A package of support to be paid for by the landowner which provides practical help and support for existing businesses to find alternative commercial premises, either temporary or permanent. This should include a mixture of financial support and professional advice;
- Section 106 financial obligations for employment & training and Local Labour and Business Scheme, along with non-financial obligations relating to local labour and business opportunities during the construction and end-use phases.



Town Planning
Civic Centre, Stockwell Close, Bromley BR1 3UH



London Borough of Lewisham

/
Application No : DC/23/00162/ADJ
Date : 2nd February 2023

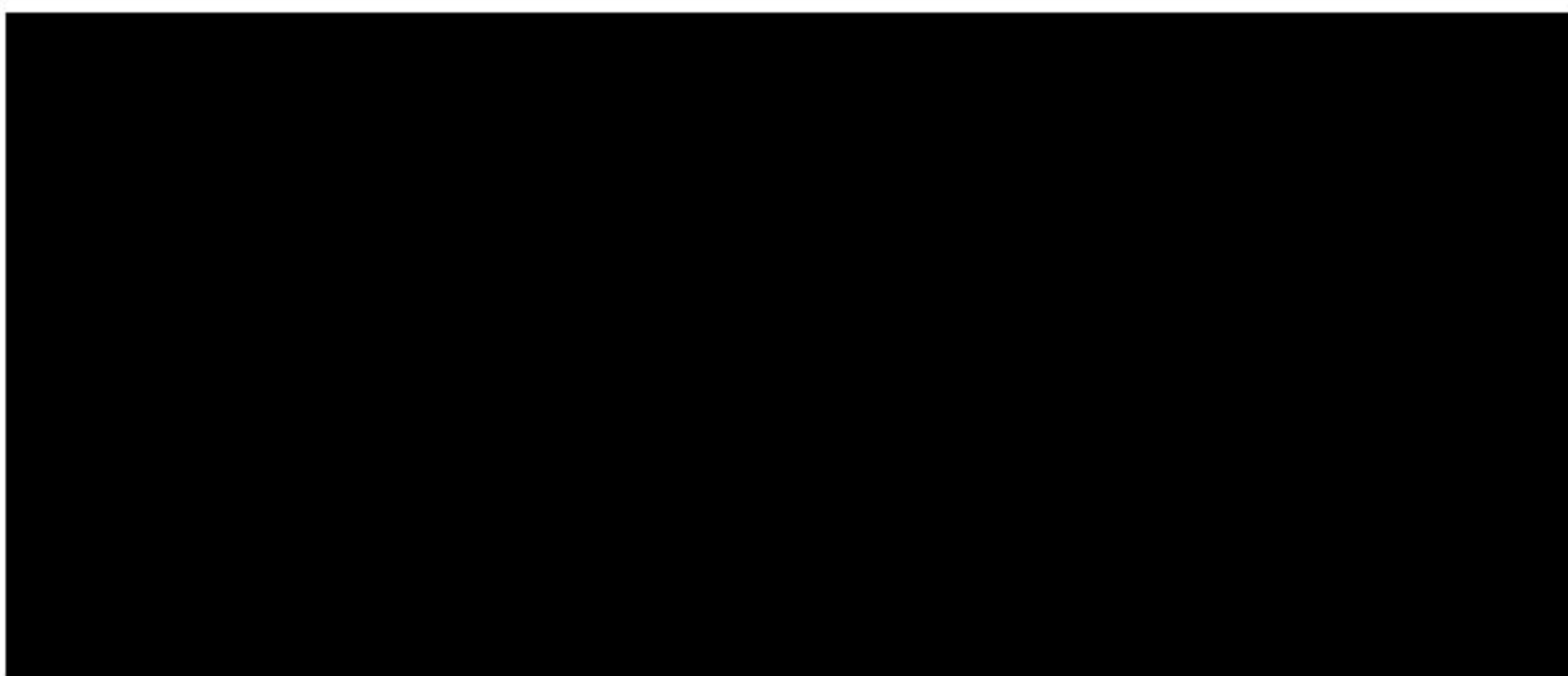
**TOWN AND COUNTRY PLANNING ACT 1990
THE TOWN AND COUNTRY PLANNING (DEVELOPMENT MANAGEMENT PROCEDURE)
(ENGLAND) ORDER 2015**

NO OBJECTIONS TO CONSULTATION FROM ADJOINING LOCAL AUTHORITY

Take notice that the Council of the London Borough of Bromley, as an adjoining local planning authority in exercise of its powers under the above Act, has raised **NO OBJECTIONS** to the following development referred to in the documents received on 16th January 2023.

at : 21 - 57 Willow Way London SE26 4QP Lewisham Council

Proposal: 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 CONSULTATION BY LONDON BOROUGH OF LEWISHAM



From: planningpa@lewisham.gov.uk
Sent: 07 February 2023 13:13
To: Planning
Subject: Comments for Planning Application DC/22/129789

Categories:

Comments summary

Dear Sir/Madam,

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 07/02/2023 1:16 PM from

Application Summary

Address: 21- 57 WILLOW WAY, LONDON, SE26 4QP

Proposal: 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

Case Officer: Gareth Clegg

[Click for further information](#)

Customer Details

Name:

Email:

Address:

Comments Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Reasons for comment:

Comments: Ref DC/22/129789

I strongly object to the above proposals for the following reasons:

1) Design plan is vastly out sized to what exists in the area. and, therefore impacts/damages the character of the area, and those housing

communities nearby.

This is evidently noted by the drawing plans which at 5/6 storeys high will dwarf nearby housing.

2) Lack of Daylight/Sunlight/Overshadowing

[REDACTED] are able to enjoy a broad (un-interrupted) degree of skyline [REDACTED]

This proposal will impede this view. [REDACTED]
[REDACTED]

I note that BLDA have not sourced any evidence from properties on the Dartmouth Road. Where, in some cases they are are closer that those on Sydenham Park.

3) Noise: Dartmouth Road, and nearby areas appear to be in a perpetual mode of "Construction". When does this draw to an end.

I query impartiality of companies carrying out work on behalf of Kitewood, and being paid by them

Kind regards

[REDACTED]

From: [REDACTED]
Sent: 13 February 2023 11:42
To: Planning
Cc: [REDACTED]
Subject: TfL Comments - Willow Way, 21-57

Categories: [REDACTED]

For the attention of Gareth Clegg

TfL Reference: LSHM/23/4

LPA Reference: DC/22/129789

Location: 21-57 Willow Way, London, SE26 4QP

Proposal: 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.

Thank you for consulting with TfL Spatial Planning regarding the above application on Willow Way. TfL have the following comments.

The site is located on Willow Way for which Lewisham is the highway authority. The closest section of the Transport for London Road Network (TLRN) is the A205 London Road located 850 metres to the north of the site.

Active Travel Zone Assessment

TfL supports the Local Planning Authority in securing contributions towards improvements outlined in the Active Travel Zone (ATZ).

Car Parking

Further information is required regarding the car parking proposed as part of this application. The current plans show there will be a provision of three car parking spaces, as well as two disabled persons parking spaces. The applicant should confirm whether the three standard car parking spaces are proposed to be in place from the outset of this development?

This development should be car-free (except for disabled persons parking) as per Policy T6 of the London Plan.

We welcome the implementation of double yellow lines along Willow Way.

A Car Parking Management Plan should be conditioned.

Cycle Parking

The quantum of long-stay and short-stay cycle parking proposed for the residential and commercial aspects of this development is in line with Policy T5 of the London Plan.

However, there are a number of issues with the quality of the cycle parking proposed:

- At least one of the long-stay commercial cycle parking spaces should be provided at a wider spacing.
- The Sheffield stands should have distances of at least one metre between each stand and any wall.

It should be ensured that the cycle parking proposed is in line with the quality standards outlined in London Plan Policy T5 and the London Cycling Design Standards.

Further information is required regarding car parking and cycle parking prior to any decision being made on this application.

Regards,



This message has been scanned for malware by Forcepoint. www.forcepoint.com

[REDACTED]

From: [REDACTED]
Sent: 13 February 2023 20:09
To: Planning
Subject: Planning application: No: DC/22/129789, 21-57 Willow Way, London SE26

Categories: [REDACTED]

13 February 2023

Re planning application: No: DC/22/129789, 21-57 Willow Way, London SE26

We are writing to object to the above planning application on the following grounds.

The absence of an agreed Outline Masterplan for the whole of the Willow Way Industrial Estate

At present, there is only an 'Emerging Outline Masterplan'. It would seem wrong to approve any sort of development for site A or Phase 1 (this planning application) without having an agreed and deliverable masterplan for the whole Estate in place. There is currently no certainty that the proposals for widening Willow Way and making it one way will be delivered. Nor does it seem likely that the proposed green space adjacent to the Bricklayer's Arms (Phase 3) can ever be delivered as the owner of site D has already indicated to the planning department that he does not wish to sell. Nor can it be certain that the Phase 2 (the redevelopment of sites B and C) would go ahead. Without site D, the masterplan as it currently stands is undeliverable and as such, the current application should fall.

The height of the buildings and their impact on the surrounding conservation areas and other properties

We strongly object to what we regard as the excessive height of the proposed building. Sited just one metre from the edge of the Sydenham Park Conservation area and with a building height of 19.82 metres, the development will tower some 8 metres or so above the top of the roofline of the houses that sit just 30 metres behind it in Sydenham Park.

Willow Way follows the north-western boundary of the former reservoir created to supply water to the Croydon Canal. Upper Sydenham began to develop in earnest in the 1840s following the canal's decommissioning, with the erection of a mix of two, three and four storey buildings (including semi-basements). Willow Way itself consisted mainly of two storey semi-detached houses. They were small scale buildings similar to those brick buildings surviving on the northern edge of the Industrial Estate on Dartmouth Road and the weather-boarded cottages in Kirkdale, just above the junction with Dartmouth Road.

All the buildings put up in the vicinity within the last 30 years have been low rise with a maximum of four stories at street level. This includes the new building put up at Sydenham School in the 2010s which replaced a taller building. The Miriam Lodge Hostel at eight stories is an outlier from the 1960s, which is a visual blight on the area and was built before any conservation areas came into being. The height and massing of the proposed development is out of keeping with the immediate neighbourhood and would blight the area as they, rather than the historic buildings, would be the dominant structures when seen from further away.

An important characteristic of Sydenham Park in the Sydenham Park Conservation area is the large gaps between the buildings through which distant vistas and the sky can be seen. This creates a special sense of openness. The height and massing of the proposed building and the fact that site A stands on higher ground would have a serious negative impact on this.

A considerable proportion of the borough's Heritage Assets are in the vicinity of the Willow Way site. As noted in the Heritage Statement, the site sits in close proximity to six conservation areas and numerous listed and locally listed

buildings. It is important to note that the whole of the site's eastern boundary and half of its northern one adjoin the Sydenham Park Conservation Area. It is also just 115 metres from the Jews Walk conservation area and 130 metres from the Halifax Street Conservation area. The Heritage Statement notes the impact of the development on the various assets, but in each case plays down their significance. With respect to the Sydenham Park Conservation area, on page 44 it states:

'In views to the west from Sydenham Park, the proposed development will be visible between the buildings which line the west side of the road. This will have the effect of making the skyline in these views a uniform height, thus changing one part of the setting of the heritage asset. This change will have no effect on the architectural interest of the buildings within the conservation area, nor the legibility of its historic character. There will be no change to the ability of an observer to comprehend immediately the characteristics which give the conservation area its heritage value.'

We disagree. The statement also begs the question of what exactly is a conservation area there to conserve? In the table that starts on p.46, it states that there is no change in the magnitude or impact on any of the assets. This is very much a matter of interpretation with which we disagree. Although the impact on individual assets may be small, collectively, we believe that they add up to more than the sum of their parts.

We welcome the fact that the height of the proposed building varies along its length, but in our view, it should preferably not be more than four stories at its highest and definitely not more than five.

Heating and the Energy Statement

The stated intention is to use air source heat pumps to provide heating and hot water. No mention is made in the plans about where these units would be located. The Government Planning Portal states that under permitted development rights:

- *All parts of the air source heat pump must be at least one metre from the property boundary*
- *If installed on a flat roof all parts of the air source heat pump must be at least one metre from the external edge of that roof*
- *They should be sited, so far as is practicable, to minimise its effect on the external appearance of the building and its effect on the amenity of the area.*

It is not at all clear how the heat pumps could be installed in a way that conforms with the above, since much of the building sits within one metre of the boundary. Half of the front, part of the rear and both sides of the building are too close to the boundary to conform with the first requirement. We note that the Energy statement also states that solar panels will be installed on the roof. These are not shown in the Landscape Design Statement nor are any heat pumps on the roof. Indeed, all the roof space has been designated for other uses in order to meet other planning requirements.

<https://www.planningportal.co.uk/permission/common-projects/heat-pumps/planning-permission-air-source-heat-pump>

Surface water flooding and the increased risk to properties in Shrublands Close and Sydenham Park

The government's flood risk maps do not appear to have been properly consulted. They are not mentioned in the Surface and Foul Water Strategy Report, but are mentioned in the Phase I study Document. What this Report has omitted to look at is the direction of surface water flow in heavy rainfall situations. These maps show that Willow Way is vulnerable to surface water flooding as a result of water from higher ground flowing towards and then down Willow way from the Dartmouth Road end and accumulating at the lowest point in the road where the proposed building is located. At present, this water would be contained by the boundary wall that separates the site from the land on the Shrublands Close side of the boundary. The Landscape Design Statement states that this boundary wall will be removed down to a level of 10cm. As a consequence, instead of being contained as at present, the water would pass through the opening that gives access to the proposed disabled parking bays and be discharged into Shrublands Close and on into Sydenham Park, which is already vulnerable to surface water flooding. It should be

remembered that both the Willow Way site and Sydenham Park are within the curtilage of the former Sydenham Reservoir. A link to the relevant maps is given below.

<https://check-long-term-flood-risk.service.gov.uk/map?easting=535056&northing=172127&map=SurfaceWater>

Consideration also needs to be given to the surface drainage in Willow Way in light of the Emerging Outline Masterplan. This proposes widening the road, but says nothing about the possible relocation/diversion of the surface water drains. Local experience of such a diversion in Kirkdale just above Sydenham Park, shows that these can easily become blocked and cause flooding. Instead of flowing down the drain, when it rains heavily, most of the water overflows the pavement, clips the building on the corner and flows into Sydenham Park instead.

Impact on light levels on the houses in the Sydenham Park Conservation and on Site B of the developing masterplan

The Daylight Sunlight and Overshadowing Assessment shows that the greatest impact of the development is on the houses and buildings in the Sydenham Park Conservation area i.e., the properties backing onto it in Sydenham Park and Shrublands Close, all of which are affected. The report plays this down by noting that overall amongst the surrounding properties ' *c. 91% and c. 93% of the neighbouring windows and rooms will fully comply with the BRE guide levels for vertical sky component (VSC)* '.

Also of significance is that there is no assessment of the impact on the buildings in the Emerging Outline Masterplan for the whole of the Willow Way Industrial Estate which would be built on the opposite side of Willow Way. This is another reason why there needs to be an agreed and deliverable masterplan before any decision can be made on the present application.

Cutting back of trees in the Sydenham Park Conservation Area

If the proposal is implemented, two trees that make a significant contribution to the Sydenham Park Conservation Area are at risk. These are marked 8 and 11 in the Landscape Design Statement. In the Arboricultural Report, it is proposed that the overhanging canopy of tree 8 should be pruned back by approximately two metres and that its canopy should also be raised. It is also proposed that tree 11 should be cut back to the boundary. The report also notes that particular care would need to be taken not to damage the roots of the trees during construction.

The trees are likely to need further cutting back in future years, given their proximity to the proposed building. The proposed works would leave the trees more likely to be damaged by high winds as a result of being cut back on one side only and may lead them to become unstable and require felling.

The green roof and roof terraces

There appears to be a degree of confusion about how these spaces will appear and be used. The Design and Access statement has a sketch on p44 showing solar panels on the roof, but none are shown on the plans in the Landscape Design Statement. Likewise, the Design and Access statement shows the roof terraces as being covered in green plantings whereas the Landscape Design Statement (p.14) shows them as being fitted out with children's play equipment. There also seems to be some confusion in the proposals as to who will have access to which roof terrace. There is also a discrepancy between the different documents about how close to the edge of the roof terraces the users will be able to get. The Landscape Design Statement suggests that the edges will be planted, whereas the Proposed Drawings Document clearly shows people standing on the edge of the Terraces looking out at the world beyond. All this raises privacy issues for the neighbouring properties, especially in light of the recent Supreme Court Judgement regarding Tate Modern – roof terraces are neither a common or ordinary use of roof space in housing developments.

Parking and loading

The plan as it stands provides just two disabled parking bays and a single loading bay. Since one of the stated aims is to “deliver enhanced and better-quality workspace that could accommodate light industrial uses and office space”, it is difficult to imagine what light industry could operate without somewhere for vans and lorries to park rather than just to load – or indeed to turn up and find the loading space already taken.

In the Emerging Outline Masterplan, it is proposed to make Willow Way mostly one way, to widen it and to make it a shared space with no on-road parking.

A quick glance at the current 3D view of the area available on Google Maps (link below) shows in excess of 40 vehicles parked in Willow Way, with more than 10 others on the access road to the rear of the buildings in Kirkdale and Dartmouth Road (which in the Emerging Masterplan becomes the pedestrian route, Dartmouth Walk). There are also numerous other vehicles which are off street in other parts of the Business Park. Where will all these vehicles be displaced to?

<https://www.google.com/maps/place/Willow+Way,+London/@51.4321614,-0.0574355,181a,35y,270h,39.44t/data=!3m1!1e3!4m5!3m4!1s0x487603d83d59d57f:0x9bac0d3dab4c12b6!8m2!3d51.4323022!4d-0.0588456>

On the afternoon of Sunday 12 February (when all the industrial units were closed), there were some 30 vehicles parked in Willow Way. Also of significance is that there were 9 vehicles parked in the development on the site of the former Police Station at the northern end of Willow Way (179 Dartmouth Road), three of which were parked on a pedestrian walkway. This development was given permission for three controlled disabled parking bays only. However, there are often 6 or more vehicles parked up. The planning constraint on parking does not seem to be being enforced by either the site owner or by the Council. The problem is only likely to get worse once all the units are occupied. At present, after having been on the market for in excess of 15 months, over half of the 23 shared ownership properties remain unoccupied with 10 still available for purchase and two being reserved.

The development in the context of other industrial units in the area

We have noted that there are unoccupied units in the Willow Business Park at the southern end of Willow Way. There are also unoccupied units in the Forest Hill Business Centre in nearby Clyde Vale. The council also has under current consideration the redesignation of nine units in Dartmouth Place/Clyde Terrace. (Ref. No: DC/22/129424), all of which are believed to be currently vacant. We also note that the Industrial Units in Fairway House at the end of Clyde Terrace have been unoccupied since completion.

This raises the question of the lettability of the proposed units in Willow Way. Will they be occupied? Or will they become an eyesore like those that are empty in Clyde Vale? Since the scheme as proposed does not appear to be financially dependent on them being let, it might be legitimate for the local community to ask what the real underlying aim of the development is and to wonder if it is a means of obtaining change of use for the site via the back door.

Community involvement

A consultation took place in early December just days before the planning application was submitted. Not only was little notice given of the consultation, but it also took place in the runup to Christmas when people already had other commitments. It should therefore come as no surprise then that few people attended in person. Kitewood did not provide any details of the proposed development on their website at an early stage. The details that did appear later were lacking much detail (link below) and give the impression that the proposed buildings were rather less tall than they actually are. Note the size of the streetlamp on p.5 for example.

https://willowway-consultation.co.uk/wp-content/uploads/2022/12/Kitewood.Willow.Way_.A1.A0.Boards.Draft1_.221129.pdf

It is worth noting that the developer has stated on both the application form and in the community consultation that the development is five stories rather than the six that it actually is. The developer has counted the ground floor and mezzanine as one story. When We took this up previously with the developer, saying that it the proposed building was clearly two stories higher than the small four story block of apartments that are on the northern boundary of the proposed building, their response was:

'I understand that storey heights are not always the most accurate reflection of the building's height as storey heights differ between properties. What I therefore propose is that once [the] application is registered with the local authority I will duly flag where in the various materials you can find the height in metres.'

This flagging up was not done. Nor was it communicated that the plans would be deposited with the local authority less than two weeks later. In a subsequent search, the only place we can find the height (19.8 metres) is in the Planning Letter. It seem to be missing from the plans themselves.

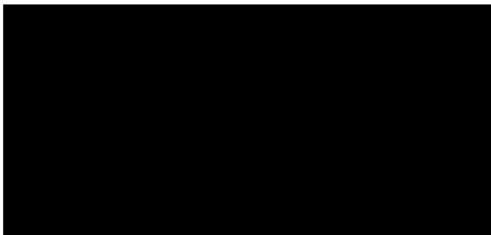
We note that the Phase 1 Desk Study and Site Reconnaissance refers to the building's height as 4 stories (p.6).

It is also worth noting that the planning application consisting of over 30 documents consisting of over 1200 pages was deposited only about three weeks after the consultation began.

Brick cladding for the buildings

On a more positive note, we approve of the proposal to use brick cladding.

Yours faithfully,



[REDACTED]

From: planningpa@lewisham.gov.uk
Sent: 15 February 2023 12:11
To: Planning
Subject: Comments for Planning Application DC/22/129789

Comments summary

Dear Sir/Madam,

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 15/02/2023 12:14 PM from [REDACTED]

Application Summary

Address: 21- 57 WILLOW WAY, LONDON, SE26 4QP

Proposal: 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

Case Officer: Gareth Clegg

[Click for further information](#)

Customer Details

Name: [REDACTED]

Email: [REDACTED]

Address: [REDACTED]

Comments Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Reasons for comment:

Comments: I would like to complain about the proposed plans for Willow Way which will take place [REDACTED] The proposal I feel will block out the light along the pathway, [REDACTED] full of trees but instead of that view I will get a further view of a large block of flats. It will impact air pollution with the building works, we have already had a large amount of housing newly built [REDACTED] This is not a social housing proposal, most local people will not be able to afford these flats, so they will not be for local people nor address social housing and homelessness needs. There

is an opportunity for there to be something meaningful and purposeful for the community built along that street, local teenagers need clubs, older people need community cafes, but what we do not need is yet another development making profit for the few at the expense of the many. I am objecting in the strongest terms to this proposal [REDACTED]

Kind regards

[REDACTED]

From:

Sent:

07 March 2023 08:10

To:

Planning; Davis, Cllr Sophie; Bernards, Cllr Peter; Harding, Cllr Billy

Subject:

21-57 Willow Way, SE26 4AR: reference DC/22/129789

[REDACTED] regarding the proposed development at 21-57 Willow Way, SE26 4AR, planning application reference DC/22/129789. This relates to the demolition of the existing buildings and redevelopment of the site with a block of 5-6 storeys, providing employment use (Use Class E(g)) at ground floor and 60 residential units above, with associated landscaping, car parking and amenity areas.

While we are generally supportive of the provision of employment use and residential units, especially affordable units, in this location, we have the concerns and comments noted below.

This site is an important element of the Willow Way Employment Location, as identified in the emerging Local Plan, and it is unfortunate that there is currently no detailed or agreed masterplan for the wider site, against which these current proposals can be appraised. The indicative masterplan provided with the Application is not clear on when the works to the public realm, including shared surface and the widening of Willow Way, will take place and how this will be achieved without the loss of area to the sites opposite to the Application Site. A detailed and agreed masterplan would clarify issues such as access and servicing, which are important considerations in the mixing of employment use and residential accommodation on the site.

The Transport Assessment identifies one loading bay for the use of all three employment uses. This bay will therefore be used regularly by goods vehicles and we have safety concerns that the location shown, outside of a main residential entrance, may not be suitable and that further thought should be given to the servicing strategy.

Regarding parking related to the development, it is noted that only disabled parking is provided. The Application documents suggest that there will be little demand for parking from new residents, but we still have concerns that without parking controls along Willow Way, car parking, access and pedestrian safety may become an issue. The road is currently consistently parked up with cars encroaching on the footpath, providing poor pedestrian access. This would be exacerbated if residents increase parking demand.

Regarding the massing, we remain concerned regarding the overall height of the proposed buildings which is excessive when compared with the 3 storey buildings in the adjacent Sydenham Park Conservation Area and the recently built 4 storey buildings at each end of Willow Way. The mezzanine level in the employment use results in a height closer to 6 storeys overall. We would recommend that the overall height is reduced by at least one storey.

We would ask that the above concerns be considered carefully before the proposals are determined.

Regards,

[REDACTED]

From: planningpa@lewisham.gov.uk
Sent: 21 March 2023 17:46
To: Planning
Subject: Comments for Planning Application DC/22/129789

Comments summary

Dear Sir/Madam,

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 21/03/2023 5:46 PM from [REDACTED]

Application Summary

Address: 21- 57 WILLOW WAY, LONDON, SE26 4QP

Proposal: 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

Case Officer: Kate Harrison

[Click for further information](#)

Customer Details

Name: [REDACTED]

Email: [REDACTED]

Address: [REDACTED]

Comments Details

Commenter Type: Neighbour

Stance: Customer made comments in support of the Planning Application

Reasons for comment:

Comments: A good idea for new homes and I hope the developers and council will do something concerning parking too!

Kind regards



Historic England

Gareth Clegg
London Borough of Lewisham
Laurence House
1 Catford Road
Catford
London
SE6 4RU

Your Ref: DC/22/129789
Our Ref: 212432
LAG/023/0664-01
Contact: Mark Stevenson
02079733737
mark.stevenson@historicengland.org.uk

2023-01-23

Dear G Clegg,

**TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)
NATIONAL PLANNING POLICY FRAMEWORK 2021**

21- 57 WILLOW WAY, LONDON, SE26 4QP

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.

Recommend Archaeological Condition(s)

Thank you for your consultation dated 2023-01-16.

The Greater London Archaeological Advisory Service (GLAAS) gives advice on archaeology and planning. Our advice follows the National Planning Policy Framework (NPPF) and the GLAAS Charter.

Assessment of Significance and Impact

The site is located outside of any Archaeological Priority Areas as defined by borough policy but is currently under review so that the whole borough will be assessed to define all areas to be within one of four levels of archaeological potential.

Given that this assessment is currently in progress, the application submitted archaeological desk-based assessment report dated 15 December 2022 by PCA Heritage, has demonstrated that the site is located in an area for which there is no current archaeological information. Of course, lack of information should not be regarded as meaning there is no archaeology.



Historic England, 4th Floor, Cannon Bridge House, 25 Dowgate Hill, London EC4R 2YA

Telephone 020 7973 3700 Facsimile 020 7973 3001

HistoricEngland.org.uk

Please note that Historic England operates an access to information policy.

Correspondence or information which you send us may therefore become publicly available.



Planning Policies

NPPF Section 16 and the London Plan (2021 Policy HC1) recognise the positive contribution of heritage assets of all kinds and make the conservation of archaeological interest a material planning consideration. NPPF paragraph 194 says applicants should provide an archaeological assessment if their development could affect a heritage asset of archaeological interest.

NPPF paragraphs 190 and 197 and London Plan Policy HC1 emphasise the positive contributions heritage assets can make to sustainable communities and places. Where appropriate, applicants should therefore also expect to identify enhancement opportunities.

If you grant planning consent, paragraph 205 of the NPPF says that applicants should record the significance of any heritage assets that the development harms. Applicants should also improve knowledge of assets and make this public.

Recommendation

Given the potential low archaeological context for the site, it is recommended that the archaeological interest can be secured by condition.

I advise that the development could cause harm to archaeological remains and field evaluation is needed to determine appropriate mitigation. However, although the NPPF envisages evaluation being undertaken prior to determination, in this case consideration of the nature of the development, the archaeological interest and/or practical constraints are such that I consider a two-stage archaeological condition could provide an acceptable safeguard. This would comprise firstly, evaluation to clarify the nature and extent of surviving remains, followed, if necessary, by a full investigation.

I therefore recommend attaching a condition as follows:

Condition	No demolition or development shall take place until a stage 1 written scheme of investigation (WSI) has been submitted to and approved by the local planning authority in writing. For land that is included within the WSI, no demolition or development shall take place other than in accordance with the agreed WSI, and the programme and methodology of site evaluation and the nomination of a competent person(s) or organisation to undertake the agreed works. If heritage assets of archaeological interest are identified by stage 1 then for those parts of the site which have archaeological interest a stage 2 WSI shall be submitted to and approved by the local planning authority in writing. For land that is included within the stage 2 WSI, no demolition/development shall take place other than in accordance with the agreed stage 2 WSI which shall include: A. The statement of significance and research objectives, the programme and methodology of site investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works
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Historic England, 4th Floor, Cannon Bridge House, 25 Dowgate Hill, London EC4R 2YA

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- B. Where appropriate, details of a programme for delivering related positive public benefits
- C. The programme for post-investigation assessment and subsequent analysis, publication & dissemination and deposition of resulting material. This part of the condition shall not be discharged until these elements have been fulfilled in accordance with the programme set out in the stage 2 WSI.

Informative Written schemes of investigation will need to be prepared and implemented by a suitably professionally accredited archaeological practice in accordance with Historic England's Guidelines for Archaeological Projects in Greater London. This condition is exempt from deemed discharge under schedule 6 of The Town and Country Planning (Development Management Procedure) (England) Order 2015.

This pre-commencement condition is necessary to safeguard the archaeological interest on this site. Approval of the WSI before works begin on site provides clarity on what investigations are required, and their timing in relation to the development programme. If the applicant does not agree to this pre-commencement condition, please let us know their reasons and any alternatives suggested. Without this pre-commencement condition being imposed the application should be refused as it would not comply with NPPF paragraph 205.

I envisage that the archaeological fieldwork would comprise the following:

Geotechnical Monitoring

It is recommended that the first stage of archaeological engagement should be the monitoring of any anticipated geotechnical site survey.

The result will inform as to whether there is an on-going archaeological interest and if so how it should be progressed by further evaluation/mitigation.

Archaeological monitoring of geotechnical pits and boreholes can provide a cost-effective means of establishing the potential for archaeological remains to survive on previously developed land or where deep deposits are anticipated. It is usually used as part of a desk-based assessment or field evaluation.

You can find more Greater London archaeology and planning information on our website.

This response relates solely to archaeological considerations. If necessary, Historic England's Development Advice Team should be consulted separately regarding statutory matters.

Yours sincerely

Mark Stevenson

Archaeology Advisor

Greater London Archaeological Advisory Service

London and South East Region



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