

LONDON BOROUGH OF LEWISHAM

Proof of Evidence of Melissa Vento (PGCert, BA Hons, MCIHT)

Appeal by: Kitewood Estates Ltd

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

PINS Reference:

APP/C5690/W/23/3321935

Council reference:

DC/22/129789

Date of Public Inquiry:

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1. QUALIFICATIONS AND EXPERIENCE

- 1.1. This Proof of Evidence has been prepared by Melissa Vento, Principal Transport Planner at the London Borough of Lewisham. I have been in this role since December 2021. The London Borough of Lewisham commissioned Project Centre Ltd to provide a Highways Development Control Service since November 2021. I am a full-time permanent employee of Project Centre Ltd and work as a Principal Transport Planner and have been working at Project Centre since November 2018.
- 1.2. I have Post Graduate Certificate in Transport Planning (University of Surrey, 2012) and a BA (Hons) in Geography (University of Greenwich, 2005).
- 1.3. I have over 12 years' experience within the Transport Planning profession, including transport development control for the past 5 years. My experience in the transport planning industry have involved both public and private sector clients including housing developers, commercial businesses, local government organisations and members of the public. I have a wide range of experience in managing active travel projects as well as highway development control support for various local authorities in London. I have also been involved in the development of transport strategies for various local authorities.
- 1.4. I confirm that I am familiar with the site and surrounding area. I appraised the submitted scheme and recommended refusal on highways grounds.
- 1.5. I confirm that the opinions expressed in this proof of evidence are my true and professional opinions.

2. INTRODUCTION, REASON FOR REFUSAL AND RELEVANT POLICY

2.1. The application was submitted on 22 December 2022 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 1-57 Willow Way, London, SE26*” The application was refused by the London Borough of Lewisham on 23 March 2023.

2.2. This statement sets out my evidence on behalf of the London Borough of Lewisham (the Council) in respect of the appeal submitted by Kitewood Estates Ltd (the appellant) against the Council’s refusal of planning permission as described above.

2.3. I can confirm that I was not party to discussions regarding any pre-application meetings and/or reviews of the site prior to the appellants planning submission on 22nd December 2022.

2.4. My evidence will focus on Reason for Refusal 2 and Refusal 3 from the issued decision notice dated 22 December 2023. My evidence should be read in conjunction with statements made by colleagues Antigoni Gkiza (Planning); Joanna Ecclestone (Design and Conservation) and Beth Stevens (Urban Design). My evidence will focus on the impact of the proposed development on the local and wider highway network covering the main highways issue relating to whether the proposal would provide adequate arrangements for access and servicing which in turn would determine the acceptability of the proposed design for future occupiers. My evidence will address points made in the appellants Transport Technical Note (TTN) dated 11 May written by Velocity submitted with their Statement of Case (SoC).

2.5. Reason for Refusal 2 states the following:

“The lack of detail on the proposed uses across the masterplan site results in a failure to demonstrate that the intensified co-location of uses can function at the proposed capacity of the masterplan site. Furthermore, it results in officers being unable to conclude that the proposal would meet the relevant transport, design, public realm or environmental policy (noise, air quality as well as sustainable urban drainage, energy and biodiversity) requirements. The granting of this application in absence of these details would fetter the development opportunity of the adjoining sites and undermine the objectives of the wider site allocation and masterplan area. The proposal would therefore fail to meet policies D3, D13, E6, E7 and SI 11 in the London Plan (2021), Policy E3 in the Lewisham Core

Strategy (2011) as well as emerging policies (Site Allocation 9: Willow Way, EC2, EC3, EC6) in the Lewisham Local Plan Proposed Submission Document- Regulation 19 Stage (January 2023)”

2.6. Reason for Refusal 3 states the following:

“The proposals would result in the closing of existing businesses on site with no justification/ relocation package proposals and there is insufficient detail in the submission on whom future occupants might be and how the space, servicing and fit out requirements will attract a range of businesses within the target market. Combined with the lack of detail to show that the site itself can be adequately serviced or that the wider masterplan area won’ t be impacted by the proposed servicing arrangements, this could impact the quality and uptake of employment spaces and undermine the continued function of the employment location. The proposal is therefore contrary to policies D3, D13, E2, E3, E6, E7, T7 of the London Plan, Policy 14 in the Core Strategy (2011) as well as emerging policies (Site Allocation 9: Willow Way, EC2, EC3, EC6) in the Lewisham Proposed Submission (Regulation 19 Plan)”

3. RELEVANT PLANNING POLICY AND GUIDANCE –

3.1. The information below sets out relevant planning policy documents in support of my statement:

NATIONAL PLANNING POLICY FRAMEWORK (NPPF), 2021

3.2. The NPPF was revised in July 2021 and then in September 2023. It established a presumption in favour of sustainable development. In reference to transport the following paragraphs in Section 9 of the NPPF are relevant, and it should be noted the revised 2023 version of the NPPF refers to the same statements as described below .

3.3. NPPF paragraph 111 states that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.

3.4. NPPF paragraph 112 refers to applications for development that should
a) give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality

public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use;

c) create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards

d) allow for the efficient delivery of goods, and access by service and emergency vehicles;

THE LONDON PLAN 2021

3.5. The London Plan was adopted in March 2021 and sets out the spatial development strategy for the boroughs in Greater London. The following policies are of relevance to transport matters in this statement.

3.6. London Plan Policy T1 – Strategic approach to transport states that development proposals should facilitate the delivery of the Mayor’s strategic target of 80 per cent of all trips in London to be made by foot, cycle or public transport by 2041. The policy also sets out that all development should make the most effective use of land, reflecting its connectivity and accessibility by existing and future public transport, walking and cycling routes, and ensure that any impacts on London’s transport networks and supporting infrastructure are mitigated.

3.7. London Plan Policy T2, Part A – Healthy Streets refers to the Mayor’s Healthy Streets Approach and states that development proposals should deliver patterns of land use that facilitate residents making shorter, regular trips by walking or cycling. High quality streets are considered 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. Paragraph 121 states 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. Successful streets are inclusive and provide for the various requirements of their users.

3.8. London Plan Policy T4 – Assessing and mitigating transport impacts sets out that development proposals should reflect and be integrated with current and planned transport access, capacity and connectivity. Furthermore, it sets out that transport assessments/statements should ensure that impacts on the capacity of the transport

network (including impacts on pedestrians and the cycle network), at the local, network-wide and strategic level, are fully assessed. Transport assessments should focus on embedding the Healthy Streets Approach within, and in the vicinity of, new development. The policy goes on to say that where appropriate, mitigation, either through direct provision of public transport, walking and cycling facilities and highways improvements or through financial contributions, will be required to address adverse transport impacts that are identified.

3.9. Policy T5 Cycle Parking states that Development Plans and development proposals should help remove barriers to cycling and create a healthy environment in which people choose to cycle. Cycle parking should be designed and laid out in accordance with the guidance contained in the London Cycling Design Standards. Development proposals should demonstrate how cycle parking facilities will cater for larger cycles, including adapted cycles for disabled people

3.10. Policy T6.5 Non -Residential Disabled Parking – Policy T6.5 stipulates access to at least one disabled parking bay (on or off street).

3.11. London Plan Policy T7 – Deliveries, servicing and construction states that development proposals should facilitate safe, clean, and efficient deliveries and servicing. Provision of adequate space for servicing, storage and deliveries should be made off-street, with on-street loading bays only used where this is not possible. Construction Logistics Plans and Delivery and Servicing Plans will be required and should be developed in accordance with Transport for London guidance and in a way which reflects the scale and complexities of developments.

3.12. Part D of London Plan Policy E7 – Industrial intensification, co-location and substitution confirms that in relation to proposals for co-locating industrial uses with residential and other uses, it must be ensured that the industrial and related activities on-site and in surrounding parts of the LSIS are not compromised in terms of their continued efficient function, access and service arrangements. Part D (3) requires that appropriate design mitigation is provided to ensure this, with particular consideration given to (b) the layout, orientation, access, servicing and delivery arrangements of the uses in order to minimise conflict.

THE LEWISHAM CORE STRATEGY, JUNE 2011

3.13. The Lewisham Core Strategy was adopted in June 2011. The following strategies are relevant to transport matters discussed in this statement

3.14. Core Strategy Policy 14 – Sustainable movement and transport states that the access and safety of pedestrians and cyclists will be promoted and prioritised; that a restrained approach to parking provision will be adopted; and that car-free status for new development can only be assured where on-street parking is managed so as to prevent parking demand being displaced from the development onto the street.

LEWISHAM DEVELOPMENT MANAGEMENT LOCAL PLAN, NOVEMBER 2014

3.15. DM Policy stipulates presumption in favour of sustainable development and emphasises that when considering development proposals, the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. It further states that the Council will work proactively with applicants to find solutions to secure development that improves the economic, social and environmental conditions in the borough.

3.16. DM Policy 29 (Car parking) requires parking standards in accordance with Core Strategy Policy 14 and stipulates car limited major residential development will only be considered where there is:

- PTAL level 4 or higher
- No detrimental impact on the provision of on—street parking in the vicinity
- No negative impact on the safety and suitability of access and servicing
- Inclusion of car clubs and cycle parking and storage
- On-site accessible priority parking for disabled drivers
- All new development will need to ensure that an appropriate number of bays have an electric vehicle charging point installed

DRAFT LEWISHAM LOCAL PLAN, PROPOSED SUBMISSION DOCUMENT, REGULATION 19, JANUARY 2023

3.17. Lewisham’s Local Plan sets out a shared vision for the future of the Borough along with the planning and investment framework to deliver this vision through to 2040.

3.18. Whilst the draft Local Plan has not yet been adopted the factual position is that the new Lewisham Local Plan is almost at submission, it has been subject to public

consultation, and it is informed by a comprehensive and proportionate evidence base. The Plan that the Council is about to submit is sound and robust, and adoptable following examination.

3.19. The following policies are most relevant to transport matters at the site which are discussed in my statement.

3.20. Policy TR3 Heathy Streets as part of healthy neighbourhoods states development proposals must be designed to maximise the contribution that public realm makes to encourage and enable active modes of travel. This includes measures to reduce vehicle dominance and enhance access, permeability and connectivity to and within sites by maintaining or integrating safe and legible routes for walking and cycling.

3.21. Policy TR5- Deliveries, Servicing and Construction Part B States that provision of adequate space and facilities for deliveries and servicing should be made off-street, with on street loading bays or other facilities only used where it is demonstrated this is necessary due to feasibility. Major and other larger developments should make provision for well-integrated facilities to allow for deliveries to be received outside of peak hours and for secure, temporary storage of parcels or goods.

Part C States development proposals for commercial and industrial uses should ensure that parking provision for servicing and delivery is commensurate with the specific operational needs of the development. The level and type of parking provision will be considered on a case-by-case basis with reference to Policy TR4 (Parking). Proposals must provide evidence to demonstrate that the provision is appropriate to location, nature and scale of commercial or industrial use.

DRAFT SITE ALLOCATION (REGUALTION19)

3.22. The Draft site allocation document forms part of the Lewisham Local Plan Proposed Submission Document – Regulation 19 Stage (January 2023). It was consulted upon from 1 March to 25 April 2023. It is anticipated that the Local Plan will be formally submitted to the Secretary of State in October 2023 for the purposes of public examination. It is recognised that in advance of this, the Proposed Submission Local Plan can be afforded limited weight in decision making but, notwithstanding this, it does establish a direction of change which can be taken into account as a material consideration. It is matter of fact that it has been subject to public consultation, and it is informed by a comprehensive and proportionate evidence base. The Plan that the Council is about to submit is sound and

robust, and adoptable following examination.

3.23. To help to facilitate good growth in Lewisham the Local Plan includes site allocation policies. These are detailed policies for strategic development sites that are critical to the delivery of the spatial strategy. The sites will play an important role in addressing the Borough's needs for new housing, workspace and main town centre uses, along with supporting infrastructure (including community facilities, transport and green infrastructure).

3.24. The site in relation to this appeal falls under West Area Site Allocation 9 of the Draft Local Plan '*Willow Way Locally Significant Industrial Site*'(LSIS). The following site allocation guidance pertinent to transport and highways are as follows:

3.25. Development requirements states that the site contains an MOT centre which is in active use. Development proposals must adequately address the operational requirements of the MOT centre in order to secure a viable future for it.

3.26. Development must not result in a net loss of industrial capacity or compromise the function of the employment location.

3.27. The site must be fully re-integrated with the surrounding street network to improve access and permeability in the local area. This includes a clear hierarchy of routes, with a legible and safe network of walking and cycle routes, through the site. Particular consideration must be given to the access and servicing arrangements for commercial uses.

3.28. The site must be fully re-integrated with the surrounding street network to improve access and permeability in the local area. This includes a clear hierarchy of routes, with a legible and safe network of walking and cycle routes, through the site. Particular consideration must be given to the access and servicing arrangements for commercial uses.

3.29. Non-employment uses, including residential uses, must be sensitively integrated into the development in order to ensure the protection of amenity for all site users, along with safe and convenient access. This will require careful consideration of the operational requirements of existing and potential future employment uses.

3.30. Enhanced permeability off Willow Way will be an essential element of the design. Proposals will be expected to investigate, and where feasible, deliver a new route(s) linking from Willow Way to Kirkdale and Dartmouth Roads.”

TRANSPORT FOR LONDON, DELIVERY AND SERVICING PLAN GUIDANCE, 2020

3.31. A Delivery and Servicing Plan (DSP) sets out how building occupiers will enable Safe, Clean and Efficient deliveries to their site. This document replaces the previous Guidance which was prepared for a past Mayor’s Transport Strategy (MTS) in London. It provides links to tools and templates to help prepare a DSP.

3.32. The DSP should describe the designated spaces for vehicle loading and unloading and how they will be managed. Adequate space should be provided off-street, with on-street loading bays used only where this is not possible and only where marked facilities are provided, where there is no other option but parking on the carriageway, the DSP should set out how the impacts on other road users will be managed. Where there is no other option but parking on the carriageway, the DSP should set out how the impacts on other road users will be managed. This should take into account specific features of the site.

LEWISHAM WASTE MANAGEMENT GUIDELINES FOR ARCHITECTS AND PROPERTY DEVELOPERS

3.33. This document provides guidelines for architects and developers of new residential, commercial and mixed-use units in the London Borough of Lewisham, to ensure that the arrangements for storing, collecting and managing waste are appropriate. The requirements for managing waste are different according to the type and size of each development, so care should be taken to ensure the right sections of these guidelines are used.

3.34. Architects and developers should also refer to Approved Document H6 of the Building Regulations 2010, and British Standards EN BS 5906:2005.

3.35. The guidance stipulates that Bin storage areas should be easily accessible for the dwellings that they serve, with residents being required to walk no further than 30m from their front door (excluding vertical distances) when carrying refuse and recycling as also stipulated in Manual for Streets, 2007. For larger developments it may be necessary to provide several bin storage areas to ensure an adequate distribution across the site. The location of communal bin storage areas should have regard to the impact of noise and

smell on the occupants of neighbouring properties, both existing and proposed.

3.36. The guidance also states that there must be a minimum of 150mm clearance around and between each bin within a storage area. Where there is more than one bin within a storage area, there must be 2m clearance in front of each bin to enable it to be accessed and safely moved without needing to move any of the other containers. All doors and alleys must be at least 2m wide to allow for safe manoeuvring of bins.

3.37. The minimum internal height for a bin storage area and any access doorways is 2m. There should be no other internal fixtures or fittings that reduce the clearance above the bins, so that their lids can be opened fully.

TRANSPORT FOR LONDON'S STREETSCAPE GUIDANCE, 2010

3.38. The purpose of this Streetscape Guidance is to set a high standard for the design of London's streets and spaces by applying best practice design principles. Specifically, Section 11 of the guidance relates to footway amenities. This section outlines footway clear zone design standards. The clear zone should be entirely free of obstructions to allow for unhindered pedestrian movement.

3.39. An unobstructed width of 1,500mm is the minimum width which allows for a wheelchair user and a person walking pass each other. 2,000mm is the Councils preferred minimum width which allows for two wheelchair users to comfortably pass each other. This guidance is similarly supported in DfT's Inclusive Mobility guidance, 2021 which states that footways and footpaths should be made as wide as is practicable, but under normal circumstances, a width of 2000mm is the minimum that should be provided, as this allows enough space for two wheelchair users to pass, even if they are using larger electric mobility scooters. If this is not feasible due to physical constraints, then a minimum width of 1500mm could be regarded as the minimum acceptable under most circumstances, as this should enable a wheelchair user and a walker to pass each other.

**4. HIGHWAYS: EVIDENCE IN RELATION TO REASON FOR REFUSAL 2 AND 3 –
ADEQUACY OF INFORMATION ON HOW THE PROPOSALS WILL IMPACT
TRANSPORT WITH SPECIAL CONSIDERATION FOR THE INTENDED
ARRANGEMENTS FOR ACCESS AND SERVICING**

4.1. Refusal 2 and 3 outlined in the Councils decision notice cover highway and transport issues that overlap with the above policies, and it is considered appropriate address these issues in one response.

4.2. As a consultee I submitted my highways comments which raised multiple issues with appellants planning submission. These concerns were detailed within the Transport Impact section of the Councils Officer Report (paragraphs 278 to 328). These concerns are outlined below:

- A need to assess the raw data and maps associated with the parking stress surveys which was not submitted as part of the application.
- The need for one disabled parking space as part of the commercial units which was not addressed in the application submission.
- Inadequate footpath widths along the front of the site on Willow Way
- Lack of commercial long-stay cycle parking and some cycle parking not in accordance with TfL's London Cycle Design Guidance
- Inadequate space for delivery and servicing, with the request for surveys
- Inadequate information on the site's refuse strategy.

4.3. In response to this the appellant' SoC the appellant refer to a Transport Technical Note (TTN), Appendix 18 of the appellants SoC. This document seeks to respond to my consultee comments where I raised the above concerns. This TTN has been subsequently reviewed by myself. I can confirm that some of the concerns raised have been satisfactorily addressed in their note.

4.4. The matters that are considered to have been satisfactorily addressed are in relation to the car parking stress survey and disabled parking provision and commercial cycle parking. Highways considers all of the resolved matters should be secured with an appropriately worded planning condition. However, the following matters are concerns that remain outstanding which have not be adequately addressed in the appellants TTN.

SERVICING AND DELIVERIES

4.5. In relation to the application proposal, I raised concerns with regard to the proposed on-street loading strategy and whether this would be sufficient to accommodate all delivery and servicing movements arising from both the commercial and residential elements, as the loading bay would only be able to accommodate one 10m box van type vehicle at any one time, or two standard sized vehicles at any one time.

4.6. The TTN responds that the proposed servicing demand has been demonstrated to be of a similar scale to the existing demand in the area and is likely to be accommodated easily within the proposed loading bay. It identifies that in the event that two 7.5t box van type vehicles propose to service the site simultaneously, it may be necessary for one to stop on-street on Willow Way to unload. The Technical Note cites that as it is proposed to provide double yellow lines along the frontage of the site which can be used for loading / unloading for a maximum of 40 minutes, it is therefore expected that there will be capacity on-street for vehicles to stop and undertake short term servicing.

4.7. In response to the above comments the servicing demand video survey indicates that the size of the loading bay should be sufficient for the commercial element of the site, however there will be residential deliveries associated with the new units which are not accounted for. Highways suggest a requirement for a larger loading bay of 18m would likely accommodate the potential 'worst-case' demand of residential and commercial vehicles arriving and departing the site.

4.8. It is noted that existing commercial premises on Plots A and C have their own dedicated external yard space, which it is assumed currently fulfils some of the delivery and servicing requirement as well as on -street associated with existing occupiers. The absence of any external yard space to serve the commercial units within the proposal can be expected to impact on the qualitative offer of these units and their suitability to meet the needs of a wider range of commercial occupiers which required varied level of servicing. Relying on a single on-street servicing bay that has to meet the needs of both commercial and residential servicing and deliveries, together with short-term parking on double yellow lines, will likely have implications for security of transit of goods between on-street parking and the commercial units. In this context, it is considered that businesses which rely on more intensive servicing and delivery requirements for their business model would not see the proposed units as a suitable proposition. This has the potential to compromise the attractiveness of the proposed employment floorspace to a wider range of occupiers.

4.9. As set out above in relation to the relevant policy context, Part D of London Plan Policy E7 states that as part of any intensification or co-location of uses, the industrial and related activities on-site and in surrounding parts of the LSIS must not be compromised in terms of their continued efficient function and access and service arrangements, and highlights that particular consideration is to be given to the layout, access, servicing and delivery arrangements in this regard. This approach is corroborated in the emerging policies within the proposed Submission Local Plan, with Policy EC3 requiring proposals to ensure the layout and design of development provides adequate operational space including for site access and servicing. Policy EC6 confirming that proposals must not adversely impact on the function or effectiveness of the LSIS to accommodate commercial and industrial uses, and the Willow Way LSIS allocation policy highlighting that particular consideration must be given to the access and servicing arrangements for commercial uses.

4.10. In this context, the Council maintain concerns in relation to whether the nature of the proposed access and servicing arrangements for the commercial uses would be suitable to meet the needs of a range of future occupiers, and that this could impact the uptake of employment floorspace and undermine the continued function of the Willow Way LEL/LSIS . Policy T7 of the London Plan states that development proposals should facilitate safe, clean, and efficient deliveries and servicing. The sites current strategy to servicing is not demonstrating that deliveries will be efficient with regards to the capacity of the proposed loading bays and therefore potential conflict with other vehicles

4.11. The rise of online food delivery platforms and increase in online shopping would indicate that residential deliveries have risen over the past few years. The applicant should also consider the installation of parcel lockers to help manage the number of deliveries to the site.

REFUSE

4.12. The appellants planning submission lacked evidence with regards to their refuse strategy. Specifically, how residents will travel/transport their bins to the refuse collection store and within the maximum 30m dragging distance in accordance with Manual For Streets, 2007 and Lewisham Waste Management Guidelines It would appear that residents would also have to navigate through several doors to reach the bin store.

4.13. The appellants TTN does not address the above comments relating to their refuse strategy. The site proposals are not in accordance with Lewishams Waste Management

Guidelines nor in accordance with DfT's Manual for Streets. However, it is considered that this matter could be addressed satisfactorily if the appellant acknowledges the concerns and proposes a suitable solution. Highways would like to review their updated proposals for suitability in addition to a suitably worded planning condition.

FOOTWAY WIDTHS:

4.14. 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 20mph speed limit.

4.15. 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 in principle.

4.16. 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. I requested 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. I suggested that the existing footways along the front of the site would benefit from widening to accommodate the new development.

4.17. In response to my comments above the appellants TNT indicated changes to the public realm including a setback of the buildings on the opposite side of the road to create a 20m street width to allow for active travel, parking and servicing. The masterplan also 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 highway footway have been proposed within the boundary of the current application. This is something that will need to be addressed in order for the application to be considered acceptable. Options like setting

the building back to improve the existing footway for this application should be considered

4.18. The appellants's technical note in response to my highway's comments introduced the potential solution of introducing double yellow lines on both sides of Willow to prevent kerbside parking and therefore retain the footway widths along the site frontage. Highways considers that the proposed solution does not resolve the outstanding matter of inadequate footway widths which is contrary to Policy T2 of the London Plan, CS Policy 14 and not in accordance with guidance set out in DfT's Inclusive Mobility and TfL's Streetscape Guidance.

4.19. As a first principal approach the appellants should provide an option of setting the building back to accommodate the required footway widths without impacting the existing level of servicing and parking for businesses on Willow Way in the immediate vicinity of the site (specifically the western side of Willow Way). The servicing/loading survey undertaken indicates that there are LGV's using the western side for loading and unloading goods relating to businesses such as 'Blue Tiger', where will these servicing trips take place if the double yellows are introduced on this side of the road?

5. CONCLUSION AND SUMMARY

5.1 Whilst there remain a number of minor points to be resolved between the parties in relation their refuse strategy, it is considered likely that these details could be resolved and secured through imposition of suitably worded planning conditions once the appropriate solutions are approved by Highways. The Council does however maintain concerns in relation to following:

A) **Servicing and Deliveries** - Whether the Site can be adequately serviced, and that this could impact the uptake of employment floorspace and undermine the continued function of the Willow Way LEL / LSIS, contrary to the provisions of Policies T7 – Deliveries, servicing and construction and E7 – Industrial intensification, co-location and substitution of the London Plan; and the following emerging policies of the Proposed Submission Local Plan: West Area Site Allocation 9 – Willow Way LSIS, EC3 – High quality employment areas and workspace, and EC6 – Locally Significant Industrial Sites.

B) **Footways Widths** - The proposals have indicated inadequate effective footway widths along Willow Way in front of the site. Highways queries the displacement of parking

by providing Double Yellow Lines on both sides of Willow Way (specifically the West). Highways is concerned with the parking for the existing commercial units that use this side of parking in association with the existing western parcels. The servicing/loading survey undertaken indicates that there are LGV's using the western side for loading and unloading goods relating to businesses such as 'Blue Tiger', where will these servicing trips take place if the double yellows are introduced on this side of the road. Therefore, the inadequate footway width solution will directly impact existing servicing for other commercial units located on the Western side of Willow Way. The above is contrary to the provisions of Policies T2 – Healthy Streets - Policies T7 – Deliveries, servicing and construction and E7 – Industrial intensification, co-location and substitution of the London Plan; and the following emerging policies of the Proposed Submission Local Plan: West Area Site Allocation 9 – Willow Way LSIS, EC3 – High quality employment areas and workspace, and EC6 – Locally Significant Industrial Sites, Policy T1