



| Conservation comments        |  |
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| <b>Application reference</b> | 22/129789  |
| <b>Site Address</b>          | 21- 57 WILLOW WAY (Site A)   |
| <b>Proposal</b>              | 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 |
| <b>Officer</b>               | Joanna Ecclestone  |
| <b>Date</b>                  | 16.02.2023 <b>Rev 07.08.2023</b>   |

Comments:

### Significance

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.

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.

The following listed buildings are also near the site to the west:

- 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.

### Impact/Harm

#### CA

- 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, at 7(?) 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 from 4, through 5 to 6 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 (nos 9 & 10) 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 13 & 15 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.

Rev 07.08.2023

TVIA submitted July 2023.

Townscape views – JE 10.07.2023

AVRs have been provided from 18 view points which include new/revised locations as requested. Please note that the numbering is different in parts to the numbers referred to above.

My comments on these views are informed by the consideration of how setting contributes to the significance of heritage assets as set out in *The Setting of Heritage Assets, Historic Environment Good Practice Advice in Planning Note 3 (Second Edition, 2017)*, including section 10 – Views and Setting.

Views 1-4, 6, 9, 14, 15, 16, 18, demonstrate no visual impact or minimal visual impact and I consider they demonstrate no harmful impacts.

View 5 – from the south eastern corner of Sydenham Hill/Kirkdale CA.

- Indicates that a glimpse view is currently afforded from within the SE corner of Sydenham Hill/Kirkdale CA, over the roofs and gardens towards Bromley and the North Kent Downs beyond, through the gap between nos 57 (on the corner of Charlcote Road) and 61 Kirkdale. This view will be largely obscured in this view.
- This is an attractive view that is afforded by the topography of the Sydenham Hill Ridge. These long reaching views are considered by Officers to be part of the special interest of Sydenham Hill/Kirkdale CA.
- They show the leafy suburban setting of the CA which is, mostly, sympathetic to the character of the CA itself and serves to preserve the significance of the CA.
- It also provides a sensitive setting to the NDHA at nos 57 Kirkdale, considered by Officers to be a building which makes a positive contribution to the CA.
- Loss of this glimpse view will cause a degree of harm (low, less than substantial) to the significance of the DHA as a result of erosion of this view obtained from it (the effect of cumulative impact in terms of progressive erosion of these views must also be considered) .

View 7 and 8 From Dartmouth Road

- Indicate scale comparable with Shippenham Court on Dartmouth Road.
- Given these two roads are very different in scale and townscape hierarchy, this is not

clearly justified. A reduction in height on the smaller road would be appropriate.

- Will be an overdominant element in the background of the locally listed Bricklayers Arms due to its height and massing.
- I consider that this demonstrates that a degree of harm will be caused to the significance of the NDHA, (low range, less than substantial).

#### View 10 opposite Shrublands Close

- Corner of block visible, will be appreciable in glimpses as one progresses along the road, but demonstrates how the development will be seen to be in close proximity with the CA.
- I consider that the visual impact of this close proximity/height in the CA's immediate setting will cause a degree of harm to the significance of the DHA CA, (low, less than substantial)

#### View 11 Carlton Terrace

- Development rises above the roofs of Sydenham Park villas.
- Form and massing doesn't respond to the pattern of development in the CA.
- Combination of height, colouration and elevational detailing hinders the ability to clearly appreciate the building envelope of the villas and detracts from their setting
- Confuses the currently coherent appearance of the townscape.
- Obscures glimpse views of tree canopy over the roofs, which is an important element in this CA.
- Does not preserve or enhance the setting of the CA;
- I consider that the visual impact in the CA's immediate setting will cause a degree of harm to the significance of the DHA CA, (low - moderate, less than substantial)

#### View 12 – Sydenham Park Road between nos 13-15.

- The development is apparent at an uncomfortably close proximity through the gap.
- It obscures views of the existing trees which is an important element in this CA
- The design does not respond to the character of the CA
- Despite '*remaining below eaves height at the front of these houses as seen in this view*' this is not how one would read this in reality; instead one's would understand that the height exceeds that of the villas, at close proximity, and with little intervening landscaping to screen or soften the relationship.
- The development fails to refer to the villas' status, or the secondary nature of the backland site in the townscape.
- I consider that the visual impact in the CA's immediate setting will cause a degree of harm to the significance of the DHA CA, (low - moderate, less than substantial)

#### View 13 – Sydenham Park Road between nos 9-10

- Similarly to view 12 above, despite the statement that '*will broadly align with the eaves height to the rear of these houses as seen in this view*' it is clear that it will appear excessively high in relation to the villas and will exceed the appropriate scale for a secondary street,
- Trees in the back garden soften the impact of the close proximity somewhat but do not obscure the inappropriate height.
- The design does not respond to the character of the CA

- I consider that the visual impact in the CA's immediate setting will cause a degree of harm to the significance of the DHA CA, (low, less than substantial)

View 17 – Kirkdale opposite Willow Way (this viewpoint is within the ASLC and also in the setting of the LBs at 134-146 and 124-128 Kirkdale,

- Demonstrates inappropriate height on a secondary road which is in excess of that on the principle street (Kirkdale)
- Lack of proposed street trees or soft landscaping
- Development obscures the views of tree canopies within the CA which contribute to the setting of the NDHA and provide a visual connection between the two areas of heritage significance
- Elevational design does not respond positively to the local context (other than the large openings at street level and materiality)
- Erosion of the historic pattern of development, hierarchy of streets, and the visual connection with the nearby CA as experienced within the immediate settings of both the NDHA and the LBs -
  - would cause a degree of harm to the significance of the NDHA (low, less than substantial)
  - would cause a degree of harm degree of harm to the significance of the DHAs (low-moderate range, less than substantial)

In summary, following assessment of the TVIA, I consider that the impacts on designated heritage assets would be:

- Sydenham Park CA – I remain of the opinion that the proposal is likely to cause harm for the reasons set out above. I consider that this would vary between low – moderate harm (less than substantial in NPPF terms), depending on the location of the view point.
- Sydenham Hill/Kirkdale CA – I consider that the development would cause a low degree of harm, (less than substantial) for the reasons set out above.
- Listed buildings at 124-128 and 134-146 Kirkdale I remain of the view that the proposal is likely to cause harm, and consider that this could be in the low -moderate range (less than substantial), for the reasons set out above.

A range of options exist to avoid or minimise the harm (eg by revising the height, massing, bulk and footprint to respond more sensitively to the designated HAs in its surroundings), or to mitigate the harm (e.g. providing sufficient space for street tree planting in front of the site on Willow Way and between the development and buildings on Sydenham Park). This has not been done.

Given that these opportunities exist and have not yet been addressed I do not consider that the harm to the DHAs is clearly or convincingly justified as required by NPPF para 200.

Public benefits exist, notably in terms of provision of new housing. These must be weighed against the *great weight* required to be afforded to the preservation of DHAs.

I consider that the impact on non designated heritage assets will be:

- Kirkdale (formerly known as Sydenham Extension) ASLC – the development would cause harm, (low, less than substantial) for the reasons set out above
- The Builders Arms – the development would cause harm, (low, less than substantial) for the reasons set out above.

This must also be taken into account as required by NPPF 203.

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.