

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	Joanna Ecclestone
Date	16.02.2023

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, 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.

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 HC1 Heritage 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.