



Mr Philip Atkins  
Planning Resolution Ltd  
Thorncroft Manor  
Thorncroft Drive  
Leatherhead  
DT21 2NW

Geoff Whittington  
Planning Services  
4<sup>th</sup> Floor Laurence House  
1 Catford Road  
London SE6 4RU

020 8314 9530  
[geoff.whittington@lewisham.gov.uk](mailto:geoff.whittington@lewisham.gov.uk)

18 December 2020  
PRE/20/118748

Dear Mr Atkins,

**Pre application concept enquiry: Willow Way, SE23**

I refer to your pre-application enquiry for the above site, and the subsequent virtual concept meeting on 26 November 2020 that was attended by Geoff Whittington (Senior Planning officer), James Hughes (Development Management Team Leader – South Area), Erik Nilsen (Principal Policy officer), and Jennifer Rivers (Surveyor, Regeneration and Place).

This was the second concept meeting relating to the comprehensive redevelopment of the Willow Way site following the first discussions held on 31 January 2020.

You have submitted the following:

- Pre-application Submission (11/11/2020)
- Pre-Application Document (November 2020)
- LSIS Masterplan - Willow Way (11/11/2020)

Whilst the concept meeting was intended to provide advice in relation to the principle of reconfiguring the existing property, some discussion was held in regard to building heights and highways matters.

**Site Description**

The pre-application site falls within the Willow Way Local Employment Locations (LEL) designation, allocated in the Lewisham Core Strategy (2011). The site currently accommodates various employment uses including business, light industrial, general industrial and storage and distribution uses (Classes E, B2, B8 and Sui Generis).

A large section of the site is currently vacant having previously been used as a temporary school. All existing buildings on site are single-storey or low rise. The immediate surrounding context is largely commercial, with some accommodating upper floor residential units.

The estate is formed of two parcels in separate ownership. The eastern parcel is owned by Tranquil Homes, and is currently occupied by light industrial units with ancillary offices, and one car repair garage with ancillary residential accommodation above.

The southern part of the western parcel is owned by LB Lewisham, and was previously in use as a vehicle depot. In recent years, it has been let on a short lease basis, however it is currently vacant.

Further to the north of the site are various uses, and you have advised that Tranquil Homes are seeking to secure options for this element.

The pre-application site has a Public Transport Accessibility Level (PTAL) of 4, which indicates good access to public transport.

## **Proposal**

The conceptual scheme incorporates a master planned approach for the site, which would include a comprehensive redevelopment of the estate to provide a mixed use of offices (Use Class E - formally B1a) - and upper floor residential units. The proposed red line area now includes the existing Willow Way Business Park to the southernmost end of the estate.

Your submission sets out that the proposal would provide an employment led redevelopment created in clusters by relevant use, with approximately 160 residential units on the upper floor levels.

New green links and public realms spaces would be designed and reinforced as a principle of the development.

A shared surface between pedestrians and vehicles would be provided within the site, with on-street parking only.

A semi-public space for small children's play and communal gathering would be accessible for future residents and the wider public.

## **Principle of Redevelopment**

The purpose of this response is to address the principle of redeveloping the site only. Other matters, including design, will not be addressed at this stage, given the concept nature of the proposal.

The Council's pre-app response dated 22 April 2020 (Pre/20/115235) advised that the Draft Local Plan had been presented to Mayor and Cabinet on 11 March 2020, whilst a date had yet to be agreed for Full Council.

Due to the Covid pandemic, Full Council was delayed until 25 November 2020, where it was determined that Members would fully endorse the Draft, thereby allowing the process to proceed to Regulation 18 consultation in January 2021 for a period of up to 12 weeks.

Whilst the Draft has progressed since our first meeting, the emerging policies will be of limited weight when consultation procedures do commence, and a final date

of adoption has not been confirmed. Consequently, the Council position has not changed, therefore officers maintain that whilst the principle of future redevelopment of the Willow Way Estate would be welcomed, DM Policy 10 (Local Employment Locations LEL) of the current Local Plan must be adhered to until the emerging Local Plan is sufficiently progressed.

The applicant is again advised to continue monitoring the progress of the emerging Local Plan, and that should an application come forward at an appropriate juncture for sufficiently employment-led mixed-use redevelopment that is master-planned, strategic release is likely to be acceptable in principle provided the scheme makes a high quality and commensurate re-provision.

Please refer back to the Council response of 22 April 2020 for the relevant policy background that remains of relevance.

## **Other Matters**

Two matters were briefly discussed during the meeting, these being parking provision within the site, and building heights.

The development is intended to be largely car free, with blue badge parking only, in compliance with the aspirations of the Draft London Plan.

I would advise that you arrange an initial meeting with the GLA/ TfL to establish whether a car free scheme in this location would be appropriate. This can also be discussed with the Council's Highways officers as part of a future pre-application, including the extent of work to be undertaken that would assist officers in determining the level of impact a car free scheme would have upon neighbouring streets.

Considering the scale and nature of the indicative proposals, the provision of underground parking for employment and residential users may be appropriate in this case. The PTAL rating of 4 indicates good access to public transport, however the site lies some distance from Forest Hill and Sydenham centres, whilst some neighbouring streets are subject to CPZs, therefore an appropriate balance between car free and parking provision must be a key consideration.

In terms of building heights, as this is a concept pre-application, officers are unable to provide a definitive response to confirm whether a scheme of up to 6-storeys would be appropriate. This can only be achieved once a detailed pre-application including contextual analysis has been received and reviewed by the Council's Urban Design officers.

## **Moving Forward**

Subject to the agreed direction of the emerging Local Plan, the redevelopment of the Willow Way LEL would require the undertaking of a comprehensive masterplan, which should focus on the physical relationship between the intended mix of uses, and placemaking.

Should this move to a detailed pre-application next year, it would assist officers if:

- A comprehensive assessment of current uses and floorspace is provided with a future detailed pre-application request. The 2019 ELS provides an assessment of the current quantum and quality of provision within the Willow Way LEL.
- An evidenced based survey that adds to this assessment would allow for a full review of the existing position and establish a baseline for re-provision.
- The applicant should also give early thought to a re-location and retention strategy for existing users where applicable.

## **Conclusion**

Officers reiterate that at this stage, the proposed comprehensive mixed-use development of the Willow Way estate including employment and residential provision would not be in compliance with the adopted Development Plan, which seeks to avoid any development that would dilute the functioning of the designated LEL sites.

However, the Draft Local Plan is continuing to progress with consultation programmed for January 2021, and officers consider that the emerging policy position is likely to allow strategy release and re-development to a timescale that accords with emerging local plan production.

The applicant is again invited to progress the pre-application process to a detailed level to address specific planning issues around layout, design and access, but a formal planning application should not be made until the Local Plan and relevant policies are sufficiently emerged.

If the applicant is of the view the proposal may exceed the thresholds for referral to the Greater London Authority, a pre-application with the GLA should be sought, which Lewisham officers would welcome the opportunity to attend. It may be helpful for a GLA view to occur before more pre-application discussions with Lewisham.

While not a concept level issue, given the possible highways alterations proposed, a pre-application with highways colleagues is strongly recommended.

I trust that this letter sets out the current position of the Council in respect of your proposals.

Please be aware that the content of this letter is sent without prejudice to the recommendation or final decision on any application submitted.

The officer dealing with your pre-application is Geoff Whittington who can be contacted on 020 8314 9530 should you wish to discuss any queries. Please quote PRE/20/118748 when contacting this office.

Yours sincerely

Geoff Whittington  
Senior Planning Officer  
Development Management Team  
Planning Service  
4<sup>th</sup> Floor Laurence House,  
1 Catford Road  
London, SE6 4RU