

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

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 [REDACTED] The proposal I feel will block out the light along the pathway, [REDACTED] but instead of that view [REDACTED] 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

Kind regards

[REDACTED]

From:

Sent:

[REDACTED]
07 March 2023 08:10

To:

Subject:

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

I am writing on [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: [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.

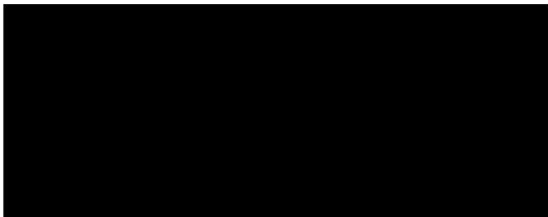
We note that the Phase 1 Desk Study and Site Reconnaissance refers to the building's height as 4 stories (p.6).

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: [REDACTED]
Sent: 23 January 2023 13:40
To: Planning
Cc: [REDACTED]
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 [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 [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 – [REDACTED]
[REDACTED] in order to give a transparent overview of the effect to ALL of the surrounding properties.
[REDACTED]

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

Kind regards
[REDACTED]

[REDACTED]

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

Categories: [REDACTED]

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 [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: 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]
This proposal will impede this view.
property.

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: 22 January 2023 16:26
To: Planning
Cc: [REDACTED]
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 that [REDACTED] in the Daylight Sunlight and Overshadowing Assessment and I believe it should have been.

The application site is approximately [REDACTED] There are no buildings between the site of the proposed development and [REDACTED] location of the proposed development. I expect that the development will therefore cause noticeable loss of daylight and sunlight [REDACTED] breach of the BRE Guidelines. There is a completely inadequate explanation for [REDACTED]

On that basis, I would like to request a revised Daylight Sunlight and Overshadowing Assessment which [REDACTED]

Upon receipt of the revised assessment [REDACTED] nt
[REDACTED]

Many thanks,
[REDACTED]

[REDACTED]
[REDACTED]

1

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]