

Willow Way

Planning Statement

21-57 Willow Way, SE26 4QP

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1.0 Introduction

1.1.1 This Planning Statement has been prepared by CarneySweeney on behalf of the applicant, Kitewood Estates Ltd, to accompany a planning application (“the Application”) to Lewisham Council for the redevelopment of 21-57 Willow Way, SE26 4AR. Also referred to as ‘Site A, Willow Way.

1.1.2 The planning application site (herein after referred to as “the Site” or “the Application Site”) is known as 21-57 Willow Way (‘Site A’).

1.1.3 The works for which the planning application seeks approval (“the Proposed Development”) are:

Demolition of existing buildings and redevelopment to provide employment floorspace (Use classes E(g)(i)(ii)(iii)) and residential dwellings including affordable housing and amenity space.

1.1.4 The Application is supported by a number of documents, as follows:

- Planning application forms and certificates, including CIL form;
- Planning Statement which also includes reference to affordable housing, open space and planning obligations (this document);
- Planning Drawings (DC Architecture + Design);
- Design and Access Statement (DC Architecture + Design);
- Emerging Outline Masterplan for the Employment-led Mixed Use Redevelopment of Willow Way (DC Architecture + Design
- Statement of Community Involvement (London Communications Agency);
- Daylight, Sunlight and Overshadowing Assessment (BLDA Consultancy);
- Employment and Marketing Strategy (Kitewood Estates Ltd);
- Landscape Design Statement including General Landscape Management Plan, CDM Designers Risk Assessment and Urban Greening Factor Assessment (Davis Landscape Architecture);



- Surface and Foul Drainage Strategy (Abstruct Consulting);
- Drainage Layout (Abstruct Consulting)
- Preliminary Ecological Appraisal (ECOSA);
- Energy Statement (Achieve Green);
- Sustainability Statement including BREEAM Pre-Assessment (Kent Sustainability);
- Phase 1 Desk Study and Site Reconnaissance (LEAP Environmental);
- Noise and Acoustic Assessment (24 Acoustics);
- Air Quality Assessment (Air Quality Consultants);
- Archaeological Desk-Based Assessment (PCA Heritage);
- Heritage Statement (PCA Heritage);
- Fire Statement (SWECO);
- Arboricultural Report including Tree Survey, Tree Protection Plan and Method Statement (Southern Beeches Ltd);
- Healthy Streets Transport Assessment (Velocity Transport Planning);
- Framework Residential Travel Plan (Velocity Transport Planning);
- Framework Employment Travel Plan (Velocity Transport Planning);
- Outline Delivery and Servicing Management Plan (Kitewood Estates Limited);
- Outline Construction Management Plan (Kitewood Estates Limited);
- GLA Carbon Emission Reporting Spreadsheet; and
- Compliance with England Building Regulations Part L 2021.

1.1.5 The purpose of this Planning Statement is to set out the proposals for the Site and to undertake an assessment against relevant planning policy and other material considerations. The Statement also contains information on affordable housing, planning obligations, housing standards and open space to justify validation requirements.



1.1.6 The Planning Statement is structured as follows:

- Section 2 – describes the existing Site and its surroundings;
- Section 3 – provides a description of the Proposed Development;
- Section 4 – sets out relevant planning policy at local and national level;
- Section 5 – assess the Proposed Development against relevant planning policy at local and national level;
- Section 6 – provides a Planning Balance assessment of the Proposed Development; and
- Section 7 – provides a summary and conclusions.



2.0 The Site and its Surroundings

- 2.1.1 The Application Site is located in Sydenham, north east of Crystal Palace, and within the London Borough of Lewisham.
- 2.1.2 The Site is bounded by Willow Way to the west and William Wood House, a retirement housing complex, to the east. Directly to the north of the Site is Moore House, a residential building, and to the south is Willow Business Park. Further to the west is catering and drink supplier, Blue Tiger as well as Recsyn House.
- 2.1.3 The Site is 7,251 sqm in size and currently comprises existing buildings including a garage, office, warehousing and one apartment. There are also approximately 16 shipping containers on the Site which are used for storage and parking. There are approximately 7 car parking spaces on the Site. The remainder of the Site is a yard area comprising hard standing.
- 2.1.4 Access to the Site is via an entrance from the west, located off Willow Way. The topography of the Site is relatively flat.
- 2.1.5 The nearest train station is Sydenham or Forest Hill, both located approximately a 10 minute walk from the Site. Both of the stations are served by London Overground and Southern trains and provide regular services north into central London and south towards Crystal Palace and Croydon.
- 2.1.6 The nearest bus stops are located on Dartmouth Road, approximately 300ft north of the Site, which includes regular services on routes 122, 176 and 197. There are also two bus stops on the A2216 which are served by routes 122, 176, 197 and 356. All routes provide connections to the wider area. The Site has a PTAL rating of 4.
- 2.1.7 There are many services local to the site, including, leisure, health, and shopping.
- 2.1.8 There are no conservation areas, listed buildings or Tree Preservation Orders within the Site. There is one Locally Listed Building on the corner of Willow Way and Dartmouth Road, which comprises The Bricklayers Arms Public House. The Application Site lies alongside the Sydenham Conservation Area.



3.0 The Proposed Development

3.0.1 This chapter provides a description of the Proposed Development.

3.1 Proposed Development

3.1.1 The Proposed Development will protect and contribute to the employment offer in Lewisham as well as providing much needed housing growth within the Borough and London.

3.1.2 The Proposed Development will provide 1401 sqm of employment space in uses Use Classes E(g)(i)(ii)(iii) alongside 60 residential dwellings. It will also provide high-quality amenity space.

3.2 Employment Space

3.2.1 The Proposed Development provides improved, flexible and sustainable workspace for employment.

3.2.2 The employment space will total 1401 sqm which will be split into separate units as follows:

- Unit 1 – 300m²
- Unit 2 – 429m²
- Unit 3 – 195m²
- Commercial Mezzanine 1 – 64m²
- Commercial Mezzanine 2 – 167m²
- Commercial Mezzanine 3 – 199m²
- Commercial Mezzanine 4 – 49m²

3.3 Housing and Design

3.3.1 The Proposed Development includes the provision of 60 residential dwellings, 50% of which will be affordable, split by tenure to meet the fast track process requirements.

3.3.2 The proposed private housing will be located in the North Core and the mix is as follows.

- Studio – 3 units



- 1 Bed (Two Persons) – 7 units
- 2 Bed (Three Persons) – 0 units
- 2 Bed (Four Persons) – 17 units
- 3 Bed (Five Persons) – 0 units
- 3 Bed (Six Persons) – 3 units

3.3.3 The proposed affordable housing will be located in the South Core and the mix is as follows.

- Studio – 1 unit
- 1 Bed (Two Persons) – 13 units
- 2 Bed (Three Persons) – 1 unit
- 2 Bed (Four Persons) – 7 units
- 3 Bed (Five Persons) – 6 units
- 3 Bed (Six Persons) – 2 units

3.4 Amenity Space

3.4.1 The amenity space will be provided predominantly on Level 4 along with some of amenity space on the ground to the rear of the Proposed Development and adjacent to William Wood House. All the residential dwellings will have access to a private balcony as well as the outside amenity areas provided.

3.5 Landscaping

3.5.1 The proposed landscaping for the scheme is provided on multiple levels. Firstly, the ground floor level includes the provision of wildlife friendly habitats at the rear of the Proposed Development, towards the eastern boundary of the Site, which also provides visually pleasing landscaping for both the new occupants and the existing residents of the care home.

3.5.2 Further landscaping is provided at Level 4 of the Proposed Development. This will comprise 3 roof terraces which incorporates areas of play space as well as general amenity space for all future occupants to enjoy.



3.5.3 Further details are provided in the accompanying Landscape Design Statement.

3.6 Access, Traffic and Parking

3.6.1 Access to the Site for pedestrians, cycles and vehicles is proposed to be taken from Willow Way. Due to its sustainable location, the Proposed Development is car-free, but will include 2 car parking spaces for blue badge holders only. The proposals include the provision of 107 long-stay cycle parking spaces for the residential element of the scheme. 43 of those will be Sheffield stands, 56 will be two-tier racks and 8 spaces will be larger bays for oversized cycles.

3.6.2 6 long-stay cycle parking stands will be provided for the commercial element of the scheme.

3.6.3 Short-stay cycle parking is proposed in the public realm space on Willow Way in the form of 4 visitor spaces in the northern part of the Site and another 4 will be provided towards the southern part of the Site.

3.6.4 Active and passive electric vehicle charging infrastructure will also be provided.

3.6.5 Further details regarding access, traffic and parking can be found in the accompanying Healthy Streets Transport Assessment.



4.0 Planning Policy Context and Material Considerations

4.0.1 This section of the Planning Statement sets out the planning policy and material considerations which are relevant to the consideration of the Proposed Development.

4.1 The Decision-Making Framework and Material Considerations

4.1.1 Section 38 of the Planning and Compulsory Purchase Act (2004) requires that planning applications must be determined in accordance with the development plan unless material considerations indicate otherwise. The current development plan comprises the following:

- Lewisham Core Strategy (June 2011);
- Lewisham Site Allocations Local Plan (June 2013);
- Lewisham Town Centre Local Plan (February 2014);
- Lewisham Development Management Local Plan (November 2014); and
- London Plan (2021).

4.1.2 Lewisham Council are currently in the process of drafting a new Local Plan which will set out a shared vision for the future of the borough along with the planning and investment framework to deliver this vision through to 2040. The emerging Local Plan is at the Regulation 19 stage and due to be consulted on in the early part of 2023. As the Local Plan continues to progress, more weight can be given to its policies.

4.1.3 The National Planning Policy Framework (2021) (NPPF) is a material consideration and is dealt with first below.

4.2 National Planning Policy Framework (2021)

4.2.1 The NPPF was revised in July 2021 and sets out the government's planning policies for England and how these are to be applied. It establishes a presumption in favour of sustainable development.

4.2.2 The NPPF has three interdependent overarching objectives in place in order to achieve sustainable development:



- An economic objective – which helps to build a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and times to support growth and innovation and to ensure the provision of appropriate infrastructure;
- A social objective – to support strong, vibrant and healthy communities, by ensuring a sufficient number and range of homes is provided to meet the needs of present and future generations, and ensuring that places are well-designed, beautiful and safe; and
- An environmental objective – to protect and enhance the natural, built and historic environment, making effective use of land, improving biodiversity, utilising natural resources, reducing waste and pollution and mitigating and adapting to climate change.

4.2.3 Paragraph 11 (parts c and d) of the NPPF requires that development to be approved where it is in accordance with an up to date development plan, or where policies are out of date or there are no relevant development plan policies, approving development provided it complies with the relevant NPPF policies which protect areas or assets of importance, and where any adverse impacts of granting permission are significantly outweighed by the benefits of the development.

4.2.4 Further to paragraph 11, paragraph 47 sets out that applications for planning permission be determined in accordance with the relevant development plan, unless material considerations indicate otherwise.

4.2.5 Paragraph 48 states that Local Planning Authorities may give weight to relevant policies in emerging plans according to the stage of preparation of the emerging plan (the more advanced the plan preparation, the greater the weight to be given); the extent of resolved objections to relevant policies, and the degree of consistency between relevant policies in the emerging plan to the NPPF.

4.2.6 Paragraph 49 follows up on this, stating that, in the context of the NPPF and its presumption in favour of sustainable development, an application that is premature in the context of the local development plan is unlikely to justify a refusal, unless both the emerging plan is at an advanced stage but not yet formally adopted, and the development proposed is sufficiently substantial that its permission would undermine the plan-making process by means of pre-determining decisions about the scale or layout of new development central to the emerging plan. Where a draft plan has yet to be submitted for examination, refusal on grounds of prematurity will seldom be justified (paragraph 50).



- 4.2.7 Paragraph 119 furthers the support for the re-use of brownfield land, stating that the effective use of land for meeting the needs for homes and other uses should be promoted by planning policies and decisions, and that policies should aim to make as much use as possible of previously developed or 'brownfield' land within the strategy for accommodating objectively assessed need. Paragraph 120 (part c) sets out that planning policies and decisions should give substantial weight to the value of using brownfield land for homes or other identified needs and should support opportunities to remediate such land where required.

4.3 Lewisham Core Strategy (2011) and Site Allocations Local Plan (2013)

- 4.3.1 The Lewisham Core Strategy was adopted in June 2011.
- 4.3.2 The Site is allocated under the Site Allocations Local Plan, adopted in 2013, under SA48. It is allocated as a Local Employment Location (LEL) to enable the protection of B Use Classes for Employment (now replaced by more recent amendments to the Use Classes Order).
- 4.3.3 **Core Strategy Policy 1 (Housing provision, mix and affordability)** seeks the maximum provision of affordable housing with a strategic target for 50% affordable housing, subject to a financial viability assessment. Contributions to affordable housing will be sought on sites capable of providing 10 or more dwellings. The affordable housing is to be provided as 70% social rented and 30% intermediate housing. The provision of family housing (3+ bedrooms) will be expected as part of any new development with 10 or more dwellings. An appropriate mix of dwellings within a development is sought, having regard to the following criteria:
- the physical character of the site or building and its setting
 - the previous or existing use of the site or building
 - access to private gardens or communal garden areas for family dwellings
 - the likely effect on demand for car parking within the area
 - the surrounding housing mix and density of population
 - the location of schools, shops, open space and other infrastructure requirements.
- 4.3.4 For affordable housing, the Council seek a mix of 42% as family dwellings and will have regard to the criteria listed above.
- 4.3.5 **Core Strategy Policy 3 (Strategic Industrial Locations and Local Employment Locations)** seeks to protect the LELs for a range of uses within the B Use Classes (B1, B8 and where appropriate B2 industry) – now replaced by more recent amendments to the Use Classes Order – and also appropriate sui generis uses, to support the functioning of the local economy.



- 4.3.6 **Core Strategy Policy 8 (Sustainable design and construction and energy efficiency)** promotes the reduction of the environmental impact of all new developments. Applications for all new major developments will be required to:
- Submit a Sustainability Statement and Energy Statement that show how the requirements of London Plan policy and the London Plan SPG Sustainable Design and Construction are met.
- 4.3.7 All new residential development (including mixed use) will be required to achieve a minimum of Level 6 in the Code for Sustainable Homes standards from 1 April 2016 (NB. Code for Sustainable Homes has subsequently been withdrawn). All major non-residential development will be required to achieve BREEAM 'Excellent' standard.
- 4.3.8 **Core Strategy Policy 9 (Improving local air quality)** seeks to improve local air quality and minimise any negative air quality impacts.
- 4.3.9 **Core Strategy Policy 12 (Open space and environmental assets)** recognises the importance of the natural environment and to help mitigate against climate change by:
- Greening the public realm
 - Providing opportunities for recreation, leisure and well-being.
- 4.3.10 **Core Strategy Policy 14 (Sustainable movement and transport)** promotes the safety and access of pedestrians and cyclists throughout the borough.
- 4.3.11 **Core Strategy Policy 15 (High quality design for Lewisham)** seeks to ensure that development is flexible and adaptable to change. It also seeks to ensure that development conserves and enhances the borough's heritage assets such as conservation areas.
- 4.3.12 **Core Strategy Policy 16 (Conservation areas, heritage assets and the historic environment)** seeks to ensure that the value and significance of the borough's heritage assets and their settings, which include conservation areas.
- 4.3.13 **Core Strategy Policy 21 (Planning obligations)** states that the need to provide infrastructure, services and/or facilities to address the impact of new development will be considered by the LPA from the outset of the planning application process.



4.4 Lewisham Development Management Local Plan (November 2014)

- 4.4.1 **DM Policy 1 (Presumption in favour of sustainable development)** 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.
- 4.4.2 **DM Policy 3 (Masterplans and comprehensive development)** states that where development proposals form part of a site allocation they must be accompanied by a site masterplan, which is expected to set out how the development will contribute to delivery of spatial strategy for the Borough. It must suitably demonstrate that the proposal will not prejudice the future development of other parts of the site and adjoining land, or otherwise compromise the delivery of the site allocation and outcomes sought for the wider area.
- 4.4.3 The site masterplan will be required to comprise of:
- A. An assessment of the site and its context to inform the overall development strategy;
 - B. A detailed site-wide masterplan that responds positively to the spatial strategy for the Borough, site specific development principles and guidelines, and other relevant planning policies; and
 - C. A delivery strategy that identifies how the development will be implemented and managed over its lifetime. This strategy must address any relevant matters to be resolved such as land assembly and preparation, infrastructure requirements, development phasing and likely need for planning obligations and/or planning conditions, where appropriate.
- 4.4.4 Proposals must address how the development site relates to neighbouring properties and the surrounding area.
- 4.4.5 Applicants must also demonstrate that they have appropriately consulted the public through the masterplan process, including active engagement with the landowners and occupiers of the subject site along with those other parts of the allocated site.
- 4.4.6 **DM Policy 7 (Affordable rented housing)** highlights the requirement of new residential development to provide on site affordable housing in accordance with Core Strategy Policy 1.



4.4.7 **DM Policy 10 (Local Employment Locations (LEL))** supports uses within the B Use Class and appropriate sui generis uses, within a LEL, subject to:

- The use being appropriate in the location in relation to the surrounding built context
- The intensity of the use and
- The new use meeting the aims in the Core Strategy Policy 3.

4.4.8 New build premises in these locations will be required to be flexibly specified and provided within an internal fit out to an appropriate level to ensure the deliverability of the units and the long term sustainability of the employment uses. The provision of lower cost accommodation suitable for starter businesses should form part of any new scheme.

4.4.9 **DM Policy 22 (Sustainable design and construction)** requires all developments to maximise the incorporation of design measures to maximise energy efficiency, manage heat gain and deliver cooling. In relation to Core Strategy Policy 8, it is recognised that some industrial (B2 and B8) uses may not be able to provide a minimum of BREEAM 'Excellent' standard.

4.4.10 **DM Policy 23 (Air quality)** requires all major developments that have the potential to impact on air quality to submit an Air Quality Assessment.

4.4.11 **DM Policy 25 (Landscaping and trees)** requires applicants for all major development to submit a Landscape Scheme.

4.4.12 **DM Policy 26 (Noise and vibration)** requires noise and/or vibration generating development or equipment to be located in the LELs and for a Noise and Vibration Assessment to be submitted in these areas.

4.4.13 **DM Policy 29 (Car parking)** requires parking standards in accordance with Core Strategy Policy 14. It states that 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.



- 4.4.14 All new development will need to ensure that an appropriate number of bays have an electric vehicle charging point installed.
- 4.4.15 **DM Policy 30 (Urban design and local character)** requires all development proposals to attain a high standard of design.
- 4.4.16 **DM Policy 32 (Housing design, layout and space standards)** expects all new residential development to:
- Be attractive and neighbourly
 - Provide a satisfactory level of privacy, outlook and natural lighting both for its future residents and its neighbours and
 - Meet the functional requirements of future residents
- 4.4.17 The siting and layout of new-build housing development, including the housing element of mixed use developments, will need to respond positively to the site specific constraints and opportunities as well as to the existing and emerging context for the site and surrounding area.
- 4.4.18 New build housing development will be required to be:
- Sited to minimise disturbance from incompatible uses and be well located in relation to public transport with a high quality pedestrian environment.
 - Provided with a readily accessible, secure, private and usable external space and include space suitable for children's play
 - Designed so that schemes in mixed tenure do not distinguish between public and private housing
 - Designed to be safe and secure and reduce crime and the fear of crime
 - Designed to ensure that internal layout and external design features ensure that housing is accessible to all intended users.
- 4.4.19 The London Plan standards will be used to assess whether new housing development provides an appropriate level of residential quality and amenity.
- 4.4.20 **DM Policy 35 (Public realm)** states that public spaces should be designed to be safe, inclusive, accessible, attractive and robust, enhancing existing connections and providing new connections as appropriate.



4.5 Draft Regulation 19 Lewisham Local Plan (September 2022)

- 4.5.1 Lewisham Council are currently in the process of drafting a new Local Plan which will set out a shared vision for the future of the borough along with the planning and investment framework to deliver this vision through to 2040.
- 4.5.2 The emerging Local Plan is at the Regulation 19 stage **and is due to be consulted on in the early part of 2023**. As the Local Plan continues to progress, more weight can be given to its policies. The policies of particular relevance and their wording are set out below.
- 4.5.3 **Draft Policy EC2 (Protecting employment land and delivering new workspace)** sets out Lewisham's Employment Land Hierarchy and states that land within the Hierarchy is safeguarded for Class E(g) office and light industrial, Class B2 industrial, Class B8 storage and distribution and related Sui Generis uses.
- 4.5.4 The draft policy allocates the Site as lying within a Locally Significant Industrial Site (LSIS). LSISs are described as Lewisham's main local concentrations of commercial and industrial uses, which perform a niche role to support the functioning of the sub-regional and local economy. They provide workspace for micro, small and medium sized businesses, including in the cultural, creative and digital industries.
- 4.5.5 The draft policy states development proposals within LSISs must contribute to the need of employment floorspace by retaining and wherever possible delivering net gains in industrial capacity, including by intensifying the use of land.
- 4.5.6 **Draft Policy EC4 (Low-cost and affordable workspace)** states that development proposals incorporating workspace should ensure that provision is made for suitable types and sizes of units, at an appropriate range of rents, particularly to meet the needs of micro, small and medium sized businesses, including start-ups. Development proposals that incorporate an element of affordable workspace at rents maintained below the market rate for social, cultural or economic uses will be considered favourably. New major commercial development proposals for Class E(g) office and light industrial, Class B2 industrial, Class B8 storage and distribution and similar Sui Generis uses must make provision for affordable workspace.
- 4.5.7 **Draft Policy EC6 (Locally Significant Industrial Sites)** protects LSIS for Class E(g) office and light industrial, Class B industrial, Class B8 storage and distribution and related Sui Generis uses, with priority being given to office and light industrial uses. Development proposals should ensure that there is no net loss of industrial capacity within these locations and seek to deliver net gains wherever possible.



- 4.5.8 The policy highlights that the co-location of employment and other compatible uses will only be permitted at selected LSIS in order to secure the long-term viability of LSIS and to help facilitate their renewal and regeneration.
- 4.5.9 **Draft Policy HO1 (Meeting Lewisham's housing needs)** seeks to significantly increase in the delivery of new homes to help meet Lewisham's housing needs by proposals making the best use of land and optimise the capacity of housing sites.
- 4.5.10 **Site Allocation 9 Willow Way LSIS** is allocated for 175 residential units and 6,705 gross non-residential employment floorspace.
- 4.5.11 The allocation is for a comprehensive employment led mixed-use redevelopment. It seeks the co-location of compatible commercial, main town centre and residential uses. The reconfiguration of buildings and spaces to facilitate a new layout with new and improved routes is sought, both into and through the site along with public realm and environmental enhancements.
- 4.5.12 The allocation seeks landowners to work in partnership and in accordance with a masterplan to ensure the appropriate co-ordination, phasing and balance of uses across the site. Development must not result in a net loss of industrial capacity or compromise the function of the employment location.

4.6 London Plan 2021

- 4.6.1 The London Plan was adopted in March 2021 (after the adoption of the various elements of the Lewisham policies) and sets out the spatial development strategy for the boroughs in Greater London. The following policies are of relevance to the Proposed Development.
- 4.6.2 **Policy GG2 (Making the best use of land)** encourages the creation of sustainable mixed-use places that make the best use of land and promotes the development of brownfield land.
- 4.6.3 **Policy GG4 (Delivering the homes Londoners need)** promotes the delivery of more homes with a strategic target of 50% of homes being affordable.
- 4.6.4 **Policy H1 (Increasing housing supply)** seeks to ensure housing targets are achieved through the optimisation of suitable and available brownfield sites.
- 4.6.5 **Policy H4 (Delivering affordable housing)** highlights the strategic target of 50% of all new homes delivered to be affordable and to be provided on-site.



4.6.6 **Policy H5 (Threshold approach to applications)** refers to the threshold approach which applies to major development proposals which trigger affordable housing requirements. The threshold level of affordable housing on gross residential development is initially set at:

- A minimum of 35%; or
- 50% for public sector land where there is no portfolio agreement with the Mayor; or
- 50% for Strategic Industrial Locations, Locally Significant Industrial Sites and Non-Designated Industrial Sites appropriate for residential uses in accordance with Policy E7 Industrial Intensification, co-location and substitution where the scheme would result in a net loss of industrial capacity.

4.6.7 To follow the Fast Track Route of the threshold approach, applications must meet all the following criteria:

1. meet or exceed the relevant threshold level of affordable housing on site without public subsidy
2. be consistent with the relevant tenure split (see Policy H6 Affordable housing tenure)
3. meet other relevant policy requirements and obligations to the satisfaction of the borough and the Mayor where relevant
4. demonstrate that they have taken account of the strategic 50 per cent target in Policy H4 Delivering affordable housing and have sought grant to increase the level of affordable housing.

4.6.8 **Policy E1 (Offices)** promotes the improvements to the quality, flexibility and adaptability of office space of different sizes (for micro, small, medium-sized and larger enterprises) in the form of new office provision and mixed-use development.

4.6.9 **Policy E6 (Locally Significant Industrial Sites (LSIS))** states that development plans should designate and define detailed boundaries for LSIS.

4.6.10 **Policy E7 (Industrial intensification, co-location and substitution)** encourages the intensification of businesses uses in Use Classes B1c, B2 and B8 occupying all categories of industrial land through:

- Introduction of small units
- Development of multi-storey schemes



- Addition of basements
- More efficient use of land through higher plot ratios having regard to operational yard space requirements (including servicing) and mitigating impacts on the transport network where necessary.

4.6.11 The policy states that intensification can also be used to facilitate the consolidation of an identified SIL or LSIS to support the delivery of residential. This approach should be considered as part of a plan-led process or as part of co-ordinated masterplanning process.



5.0 Planning Policy Assessment

5.1.1 This section of the Planning Statement assesses the Proposed Development against the development plan policies.

5.1.2 Having considered the nature of the application and the relevant planning policy background, it is considered that the following issues are most relevant to the application proposal:

- The Principle of the Development
- Employment Space
- Housing
- Design
- Amenity Space
- Transport and Access

5.2 The Principle of the Development

5.2.1 The Proposed Development comprises an employment-led mixed-use redevelopment of the Site incorporating high-quality residential dwellings.

5.2.2 At the heart of the NPPF lies the principle in favour of sustainable development. NPPF paragraphs 119-123 promote the efficient use of land in meeting the needs for employment space and the needs for homes. Substantial weight is given to the use of brownfield land and the development of under-utilised land and buildings. The principle of sustainable development is further supported at paragraphs 64 and 119 of the NPPF, both of which relate to the re-utilisation of brownfield land to meet the need for homes and other uses.

5.2.3 Development Management Local Plan 2014 Policy DM 1 also supports the presumption in favour of sustainable development.

5.2.4 The Site is allocated under the Site Allocations Local Plan 2013 under SA48 as a Local Employment Location.

5.2.5 Although the application site does not currently contain a significant proportion of industrial uses, as recognised by the Employment Land Study (2019); it is acknowledged that the Council is seeking to change the site to an LSIS in the emerging Local Plan.



- 5.2.6 The adopted London Plan 2021 supports the Proposed Development through Policy GG2 (Making the best use of land) and Policy E7 (Industrial intensification, co-location and substitution), the latter of which facilitates the consolidation of an identified LSIS to support the delivery of residential through co-location. The Proposed Development is for the Site's redevelopment for increased employment floorspace and new residential units (including 50% affordable housing) which is supported by adopted London Plan policies.
- 5.2.7 The emerging Draft Regulation 19 Local Plan was published in September 2022 and allocates the Site for mixed employment and residential redevelopment, under Site Allocation 9 Willow Way.
- 5.2.8 The Proposed Development represents a carefully designed scheme that effectively responds to the surrounding urban character and context. It seeks to optimise the site's capacity and intensify development and make more efficient use of the land. The Proposed Development retains and provides net gains to the employment floorspace (+ 58 sq m) and provides this alongside residential development to meet the needs identified in the NPPF and specific adopted policy in the London Plan **and** the emerging policy of the Lewisham Draft Regulation 19 Local Plan. An Emerging Outline Masterplan for the Employment-led Mixed Use Redevelopment of Willow Way has been submitted with Kitewood's planning application in response to emerging policy. This is intended to be the first draft of a document to be progressed in liaison with the Council and others. This document demonstrates that the Proposed Development will not prejudice the future development of other parts of the wider Willow Way area, or otherwise compromise the delivery of the site allocation and outcomes sought for the wider area, in line with Lewisham adopted policy DM3.

5.3 Employment Space

- 5.3.1 The use of the Site for employment is supported by the Site Allocations Local Plan 2013, the emerging Draft Regulation 19 Local Plan 2022 draft Policy EC2 (Protecting employment land and delivering new workspace) and London Plan Policy EC6 (Locally Significant Industrial Sites) which identifies the Site as needing to provide Class E(g) office and light industrial, Class B industrial, Class B8 storage and distribution and/or related Sui Generis uses.
- 5.3.2 The proposals are delivering 1401 sqm of employment space, in contrast to an existing 1343sqm of floorspace which is 58 sqm more than the existing provision.
- 5.3.3 The proposed employment uses seek to create a unique space by providing the following types of employment space:
- Incubator



- Maker space
- Studio
- Co-working
- Managed workspace
- Ancillary office space

5.4 Housing

5.4.1 The Proposed Development includes 60 residential dwellings of which 50% are to be affordable homes, in accordance with Core Strategy Policy 1 and emerging Local Plan Policy HO1. The scheme will also provide a suitable mix of units considered to be appropriate for the Site's location and context, namely 1 and 2 bedroom units, some studios and 3 bedroom family sized homes. This is in accordance with Core Strategy Policy 1 and emerging Local Plan Policy HO1 and HO3. The proposals will comply with the Nationally Described Housing Standards and Building Regulations.

5.5 Design

5.5.1 In accordance with national and local planning policy, the Proposed Development will be of a high quality design. The proposals will enhance Willow Way, by providing active frontages in order to enhance the character and improve the safety of the area. The density, scale and massing of the proposals maximises the capacity and potential use of the Site whilst successfully responding and respecting the context of the area.

5.5.2 The design has been carefully considered to protect the relationship to the Conservation Area and the planning application is accompanied by a Heritage Statement.

5.6 Amenity Space

5.6.1 The Proposed Development seeks to provide private amenity space in accordance with London Plan Policy D6 as well as making appropriate provision for play and informal recreational space in accordance with London Plan Policy S4.

5.6.2 The amenity space provided for the residential element of the Proposed Development comprises private balconies for each unit plus communal open space located on the 4th floor of the building, as set out below:



- Amenity space 1 – 150 sqm
- Amenity space 2 – 159 sqm
- Amenity space 3 – 142 sqm

5.6.3 The open areas of space provided on the ground floor are to be used for the employment element of the proposals.

5.7 Landscaping

5.7.1 The landscaping proposals include the provision of wildlife habitat creation along the western boundary of the Site to benefit occupiers of the Proposed Development and to act as screening and visual amenity to the neighbouring care home. The 3 amenity spaces on Level 4 also provide attractive landscaped areas for the residents.

5.7.2 The Proposed Development is accompanied by Landscape Design Statement which includes further details on the management and maintenance of the high-quality hard and soft landscaping in accordance with the Development Management 2014 Policy 25 and the emerging Local Plan Policy GR4.

5.8 Transport and Access

5.8.1 The Site is located in a sustainable location, with a PTAL rating of 4. It is well connected to Forest Hill Train Station and Sydenham Train Station and has good access to bus routes. As such, the Proposed Development is car-free for residential uses. It has been designed to prioritise walking and cycling and to minimise trips made by motorised vehicles. The proposals only provide disabled persons parking and cycle parking in accordance with the London Plan and Lewisham Development Plan standards.

5.8.2 Forest Hill and Sydenham both have good services and facilities for shopping, leisure, and healthcare, which the Proposed Development will have easy access to.

5.8.3 The Proposed Development is supported by a Healthy Streets Transport Assessment, a Framework Residential Travel Plan and Framework Employment Travel Plan. The Transport Assessment concludes that the impact of the Proposed Development on public transport is expected to be negligible.



5.9 Planning Obligations

5.9.1 The planning application proposes planning obligations which will be agreed through a Section 106 Agreement. These are expected to include:

- 50% Affordable Homes;
- S278 Highways works;
- Secure Residential Travel Plan;
- Secure Employment Travel Plan;
- Net Zero Carbon Off-set Payment; and
- 12+ Play Provision Contribution.



6.0 Planning Balance

6.1.1 This section of the Planning Statement provides an assessment of the planning balance having regard to the matters considered the earlier sections.

6.1.2 The Planning Application Proposals are assessed in the follow manner:

- Do the proposals comply with the Development Plan?
- Do the proposals give rise to any harm to heritage assets, having applied a heritage balance?
- Are there material considerations which should be weighted in the balance?
- Do the benefits of the proposals outweigh any harm that has been identified?

6.1.3 As part of the assessment, each of the relevant benefits and any harm is graded using the key below:



Scale		
<div>Benefit</div> <div>↓</div> <div>Harm</div>	Very Significant Benefit	
	Significant Benefit	
	Moderate Benefit	
	Limited Benefit	
	Very Limited Benefit	
	Neutral	
	Very Limited Harm	
	Limited Harm	
	Moderate Harm	
	Substantial Harm	
	Very Substantial Harm	

Do the Proposals comply with the Development Plan?

- 6.1.4 The proposals make optimal use of the site by incorporating employment use, as required by adopted and emerging planning policy, together with the provision of residential use (including 50% affordable housing) which is an inherent objective of the London Plan 2021 and the direction of travel of the new draft Regulation 19 Local Plan.

Do the proposals give rise to any harm to heritage assets, having applied a heritage balance?

- 6.1.5 The Heritage Statement that accompanies the Planning Application concludes that there will be no harm to heritage assets as a result of the Proposed Development.



Are there material considerations which should be weighted in the balance?

- 6.1.6 The Proposed Development will contribute to the much needed supply of homes, in accordance with Paragraph 60 of the NPPF which supports the Government's objective of significantly boosting the supply of homes. Further to this, Paragraph 11 of the NPPF supports the presumption in favour of sustainable development, whereby for decision-taking this means approving development proposals should be approved that accord with an up-to-date development plan without delay.

Do the benefits of the proposals outweigh any harm that has been identified?

- 6.1.7 The NPPF supports the presumption in favour of sustainable development, for decision-making the NPPF states that where the policies which are most important for determining the application are out-of-date, permission should be granted unless:
- the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed;
 - any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.
- 6.1.8 Each significant matter associated with this Proposed Development has been considered and given an appropriate weighting in our overall consideration of the planning issues in the table below:



Issue	Weighting
Provision of much needed housing	Very Significant +
Provision of improved and an additional quantity of employment space	Very Significant +
Redevelopment of sustainable, urban, brownfield site and optimising the site's capacity	Very Significant +
High quality design, including creating a beautiful and successful place	Significant +
Provision of a variety of housing sizes and mixes	Significant +
Provision of construction employment opportunities	Significant +
Provision of amenity space	Significant +

6.1.9 The Proposed Development provides an employment-led mixed-use redevelopment of a brownfield site in Lewisham.

6.1.10 The benefits of the redevelopment of the Site to provide improved and an additional quantity of employment space, much needed high quality housing and the redevelopment of under-utilised brownfield land all give 'Very Significant' weight in favour of the development.

6.1.11 The high-quality design of the proposals in a sustainable location, providing a varied housing mix, provision of construction employment opportunities, and the provision of amenity space all give 'Significant' weight in favour of the Proposed Development.



7.0 Summary and Conclusions

7.1.1 This Planning Statement has been prepared on behalf of Kitewood Estates Ltd ('the Applicant') in support of a full planning application for 21-57 Willow Way.

7.1.2 The full description of the Proposed Development is:

"Demolition of existing buildings and redevelopment to provide employment floorspace (Use classes E(g)(i)(ii)(iii)) and residential dwellings including affordable housing and amenity space"

7.1.3 The Site comprises under-utilised brownfield land containing poor quality industrial buildings, shipping containers and yard space. This Planning Statement has shown that the proposal has been designed to accord with the requirements set out within national and local planning policy. It has also been designed in response to an evolving Masterplan for the wider area. The Proposed Development will redevelop the Site to better utilise the space to provide high quality employment space and residential dwellings and will therefore enhance the wider context of the Site Allocation.

