



Highways and Transport comments	
Application reference	DC/22/129789
Site 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
Officer	Melissa Vento
Date	10/08/2023

Comments:

The comments in this note respond to the technical note submitted by Velocity Transport Planning (VTP) dated 11th May. The technical note submitted provides their response to refusal as set out in our transport comments and the planning officers report. The comments below respond directly to the transport comments submitted which are summarised at Section 1.3 and Table 1.2 of their note.

Car Parking: VTP's car parking stress survey as presented in Appendix B and the explanation provided at paragraph 322 and 325 of their note is considered acceptable.

Disabled Parking: VTP's response relating to the one potential disabled parking space which could be provided on-street is considered acceptable. The swept paths of a large car entering and exiting the site in forward gear are considered acceptable.

Site Access: No further comments. Please see comments below regarding footway and carriageway widths.

Footway Width and Carriageway Widths: Whilst the introduction of double yellow lines on both sides of Willow Way is considered an option to reduce kerbside parking and therefore retain the footway widths along the site frontage this will cause a level of displacement of parking on Willow Way to the surrounding roads. The applicant as a first principal approach should provide an option of setting the building back to accommodate the required footway widths without impacting the existing level of servicing and parking for businesses on Willow Way in the immediate vicinity of the site (specifically the western side of Willow Way). The servicing/loading survey undertaken indicates that there are LGV's using the western side for loading and unloading goods relating to businesses such as 'Blue Tiger', where will these servicing trips take place if the double yellows are introduced on this side of the road?

Cycle Parking: VTP's updated plans indicate 6 commercial long-stay spaces which is welcomed however a door should be provided to indicate a secure storage on the submitted plans. Sheffield cycle parking should be provided at 1m space between each stand. The current arrangement of cycles to the eastern flank of the cycle store is not in accordance with TfL's London Cycle Design Standards

(LCDS). Cycle provision and design is aligned with LCDS not LTN/120 which is an acceptable national guidance. LCDS applies as a regional standard for London authorities.

Trip Generation and Impact: VTP's response provided at 323 and at Appendix B with regards the servicing demand video survey indicate that the size of the loading bay should be sufficient for the commercial element of the site. However, there will be residential deliveries associated with the new units which are not accounted for. A loading bay of 18m will likely accommodate the potential worst-case demand of residential and commercial vehicles arriving and departing the site.

Refuse Delivery and Servicing: Please note our comments above with regards to trip generation and impact. Additionally, no further details have been provided on refuse collection and their strategy. It is not clear how residents will travel/transport their bins to the refuse collection store and within the maximum 30m dragging distance in accordance with Manual For Streets. It would appear that residents would also have to navigate through several doors to reach the bin store. The applicants refuse strategy is unclear and therefore is unable to be approved at this stage.

Healthy Streets (Active Travel Zone Assessment): No further comments. Highways original comments remain valid. To re-iterate There are many suggested improvements that Lewisham Transport agrees with. It is suggested that items in Table 4-7 of the TA are set out as highway improvements and are secured as part of a section 278 agreement should planning approval be granted. The suggested improvements will need to be refined and detail provided where required before the agreement is finalised.

Construction Logistics Plan: No further comments

Section 278 Improvements: No further comments

Section 106: In addition to highways previous comments, it is considered that the applicant should provide a car club strategy for the site which would consider converting one of the on-street parking spaces into a car club bay to further reduce the potential number of car owners at the site taking into consideration the scale of the site. This should be secured by condition if the planning inspectorate are minded to allow the appeal. Other section 106 obligations is as follows:

- Permit free agreement

Planning Conditions: Should the planning inspectorate allow the appeal the highway authority would consider the following conditions applicant to the site.

Detailed CLP
Refuse Strategy
Car and Cycle Parking Details
EV Charging Details
Delivery and Servicing Plan
Residential and Commercial Travel Plan

Relevant Policies:

- The National Planning Policy Framework (NPPF) (February 2021);
- National Planning Practice Guidance (NPPG) (February 2019);
- The London Plan (2021); Policy T5 and Policy T6
- Lewisham Core Strategy Core Strategy (June 2011) (CS09 Transport Accessibility and CS14 Sustainable Movement and Transport)

- Lewisham Development Local Plan (2014) (DM29 Car Parking)
- Draft Lewisham Local Plan (2023)

Recommendation:

Based on the additional information provided by the applicant further details in relation to refuse, cycle parking and delivery and servicing are required and therefore are unable to provide local highway approval until the remaining issues are resolved.

Potential revisions/amendments (if necessary):

See comments above