

Item 7.1: Sultra House, 29-31 Pages Walk, LONDON, SOUTHWARK

Late Representations

1. Since the publication of the main committee report, one late representation has been received. The points raised (in *italics*) and Officer's response are summarised below:
2. - *The existing building is not 11.8m high.*

Response: This is noted and paragraph 3 should be corrected to say 11.3m in the main report.

- *In addition to the consultation responses, a petition to limit the height of buildings in Pages Walk was signed by 86 local residents and submitted to the Director of Planning and the Leader of the Council in August 2020.*

Response: Officers had inadvertently missed to report this in the main report. This should be added to the consultation section of the report (Paragraph 18).

- *The proposed development juts out as a monolithic block right up to back of pavement. It blocks views up and down the street. It destroys the openness. It narrows down the street and makes it claustrophobic. Its size, length and depth are totally out of scale with the street. It does not recognise, or respond to, the existing townscape, character, or context.*

Response: The scale, massing, height and views are discussed in the Design Considerations of the main report (from Paragraphs 93 onwards).

- *Upper floors are not set back from Pages Walk; they project out from the existing building line. Questions over the setback of the upper floor measurements. The National Planning Policy Framework requires adherence to the National Model Design Code which is quite specific about keeping to the building line. The report also does not mention whether the developers have the right to build out over what has been publicly accessible land for many decades.*

Response: The upper building line measured no closer than 3.75m to the kerb and this is provided in a drawing submitted by the applicant. The building does not project 4.5m from the existing building line; it varies from 2.11m to 3.5m. Officers have already discussed the setback of the building in the main report. As shown in the submitted drawings the set back is relatively modest on the top floor, but it should be noted the scheme originally projected further out over all the floors. It should also be pointed out that the existing building is

very slightly splayed from the established building line and is in fact not parallel to the rest of the buildings on the street. Whilst the proposed building would indeed step forward this is not a significant projection and would not significantly harm the streetscene to warrant a refusal.

The proposed development is entirely within the title ownership of the developer. The existing forecourt is within the title boundary, and the change of hard surface visible on the site roughly denotes the boundary edge with the public right of way. It has already been noted in the main committee report that the public footway is currently approximately 1.22m to 1.28m wide in front of 29-31 Pages Walk, which would increase to provide a minimum of 2.4m clear pavement width across the entire width of the site under the proposed scheme.

- *Questions the heights set out in the draft AAP (2020). It does say “up to six storeys”, not that buildings should be six storeys. It is not known where these six storeys came from in the 2nd version of the AAP. Pages Walk forms the boundary to the Opportunity Area and the Area Action Plan so proposed development should respect existing, not emerging, heights and scale.*

Response: Reference to building heights on Pages Walk was omitted in the 2017 version of the AAP and added in 2020 in order to provide greater clarity. It is noted that there are objections to the policy and as stated in paragraph 114 of the report, the draft AAP has limited weight. Arguably 6 storeys is consistent with the AAP strategy of encouraging lower heights towards the fringes of the Opportunity Area. The Marshall House development (Alwen Court) on the west side of Pages Walk ranges up to 6 storeys, while the Harold Estate to the west of Pages Walk is 4 storeys. At 6 storeys, development on the east side of Pages Walk does help mediate up to 9 storeys on Crimscott Street.

- *Questions the impact of the development on the existing amenity space opposite on Pages Walk.*

Response: This topic is covered in the main committee report (paragraph 150). Officers had analysed the findings of the submitted daylight and sunlight assessment and this confirms that it would exceed the BRE guideline. The report confirms that 99% of the lit area will be held.

- *Impact of the development on the views and the 18-19 Crimscott Street should not be used to set the context for this development.*

Response: This has already been addressed in the main committee report (Height and Massing section from paragraph 98 onwards).

- *It is surprising the report does not question this lack of contextual information but is still able to conclude that the building is fine in its context.*

Response: The submitted drawing show this site in the context of the existing, emerging, approved and constructed schemes on Crimscott Street, Grange Road and Rich Industrial Estate.. This is the first site to come forward for development on Pages Walk and will indeed contrast with the low-rise industrial building currently adjoining the site here, but the adjoining sites could well be redeveloped in the future. 18-19 Crimscott Street is an example of this.

- *The views described in the Pages Walk Conservation Area Appraisal do not appear to be considered in this report. The view out of “the gateway”, looking northeast between the Victoria pub and the Willows, would be of a side wall at full depth of the site towering 6 stories over the conservation area. Harm to the setting of the conservation area.*

Response: This is addressed from paragraph 121 in the main committee report. Officers have had special regard to the impact of this scheme on neighbouring heritage assets and considered that the impact of the development on the setting of the Pages Walk Conservation Area to be ‘less than substantial harm’. It is acknowledged that there would be some degree of harm, but the existing residential buildings and their distinctive butterfly roof profile would be visible and can still be readily appreciated. In this context and as set out in the main report the proposed development is not considered to harm the setting to a significant degree. As a result, its impact on the conservation area is considered to result in less than substantial harm to the heritage asset, which would be outweighed by the public benefits of the proposals. The public benefits outlined in the main report include the provision of new employment space including affordable work space, which will help to deliver key policy requirements on the New Southwark Plan, including 10,000 new jobs in the Old Kent Road AAP (AV.13 Old Kent Road Area Vision, NSP). For the avoidance of doubt officers have considered this public benefit in the planning balance against the harm caused by the scheme and have concluded that the balance of considerations falls in favour of recommending approval of the scheme.

- *The proposed development blocks out daylight and closes off outlook for so many existing residents. Questions the daylight assessment, in particular the levels to Harold Estate and the use of the alternative tests (removing the access decks).*

Response: This is covered under the Daylight and Sunlight Impacts section in the main Committee report. The BRE guidance allows for this alternative test.

Corrections and clarifications on the main report

3. The following paragraphs should be replaced in the main report.

Paragraph 80 Use class

- The main report read: “The proposed re-development of the site would introduce a commercial building comprising of 3,769sqm of Use Class E(g)(iii) floorspace.”

Strictly speaking, the 3,769sqm is Use Class E(g) – with the majority of the ground floor as Light Industry i.e. Use Class E(g)(iii), and the remainder in office i.e. Use Class E(g)(i).

Paragraph 125 Harm on Heritage Assets:

- A table in the main report should be corrected as below (delete words ~~strike through~~ and include words in **bold**). This was an error in the main report. The closest listed buildings are not in view of the development and therefore no harm to its setting is identified.

Listed Buildings and Conservation Areas	Assessment of Impact on heritage significance
LVMF Views	No harm identified
Local Views	No harm identified
Pages Walk Conservation Area	Less than substantial harm
Bermondsey Street Conservation Area	No harm identified
Listed Buildings	No substantial harm to the setting identified owing to the height and distance of the development from nearby assets
Draft Locally listed buildings/ undesignated assets identified in the draft Old Kent Road AAP	No harm identified.

Paragraph 135 Daylight and sunlight:

- Paragraph 135 of the main report had noted that 80 Willow Walk & The Willows are located to the east of the proposed development site. This should be corrected to read “80 Willow Walk & The Willows – These properties are located to the ~~east~~ **south** of the proposed development site.”

Daylight and Sunlight:

- Officers would like to highlight the impact of the scheme on the Rich Estates Plot 2 as this was not discussed in the main report.
- Of all the windows tested at Rich Estate Plot 2 development, all main habitable room windows meet the BRE VSC recommendations with the exception of 2 windows on the first floor. One of these is to a bedroom, which is considered to be less important. The second one appears to serve a living kitchen and dining room. This

room achieves a result of 0.75 against a target of 0.80. In terms of daylight distribution, two rooms fall below the target. One of these would reduce by 0.79, so very marginally below the 0.8 factor recommendation. The other window that falls below the 0.8 target is a Living/kitchen/dining room on the first floor. The VSC would reduce by 0.53 (from an existing 29.6 to 15.7). However, it is noted that this room sits behind an inset balcony and that contributes to the greater loss. Overall, it is considered that there would not be a significant loss of daylight amenity to these residents at Plot 2.