

Item No. 7.3	Classification: Open	Date: 20 January 2015	Meeting Name: Planning Sub-Committee B
Report title:	Development Management planning application: Application 14/AP/1726 for: Full Planning Permission Address: 25 - 31 PENROSE STREET, LONDON SE17 3DW Proposal: Development of the site as 8 dwellings (comprising 6 three storey brick x 3 bedroom terrace houses and 2 converted three bedroom houses) including alterations and extension of part of the existing mail sorting office.		
Ward(s) or groups affected:	Newington		
From:	Head of Development Management		
Application Start Date 17/06/2014		Application Expiry Date 12/08/2014	
Earliest Decision Date 17/07/2014			

RECOMMENDATION

- 1 That planning permission be granted subject to conditions.

BACKGROUND INFORMATION

Site location and description

- 2 The application site consists of a red brick Victorian building, originally designed by the architect Henry Tanner as a post office sorting office and warehouse. Although it is neither statutory listed nor found within a conservation area, it does form a distinctive townscape element with well detailed finishes that contribute positively to the street scene. It is considered to sit well between the industrial character of the adjacent railway viaduct to the east and the domestic villas to the west. It has a double height pitched roof creating an internal hall space, with an office at mezzanine level. Attached to the west elevation there is a more modern, brick built single storey extension and a space for loading and car parking.
- 3 Directly abutting the application site to the west is a two storey building at 33 Penrose Street that is Grade II listed. The application site is considered to fall within the setting of this listed building and any proposals will be considered accordingly.
- 4 To the north of the application site is Penrose Street. On the other side of Penrose Street is a warehouse building of some 17m in height. To the east of the site is Penrose Grove, which wraps around to the rear (south) of the building. On the other side of Penrose Grove to the east is the railway viaduct with commercial uses under the arches. These are mostly screened from the application site by a relatively tall brick wall on the back edge of pavement. To the south of the site there is a more

modern two storey building and further south still, a taller block of residential flats. The area to the west of the application site comprises predominantly two and three storey residential properties.

- 5 There are two points of vehicular accesses to the site, one from Penrose Street at the front and one from Penrose Grove to the rear.
- 6 The site lies within the following designated areas according to the Southwark Core Strategy 2011: air quality management area, urban density zone. The application building is not listed, neither is the area a conservation area. The two storey building immediately to the west at 33 Penrose Street is listed grade II. This building is currently in use as a doctor's surgery.
- 7 The site is within a controlled parking zone (CPZ) and has a public transport accessibility level of 5, indicating good access to public transport.

Details of proposal

- 8 Planning permission is sought for the conversion and extension of the front section of the building to provide 2 new 3 bedroom dwellings each over two floors. To the rear of the site it is proposed to construct a terrace of six three storey 3 bed houses, these will front onto Penrose Grove.
- 9 The proposals under consideration would retain and restore the front part of the existing sorting office and warehouse building and convert it into 2 new residential dwellings. Between this and the listed building at 33 Penrose Street a new single storey annex would be built to contain another new residential dwelling (partially in the annexe and partially in the converted sorting office).
- 10 The rear part of the existing sorting office would be demolished and replaced with private gardens and six new terraced houses fronting Penrose Grove to the south. The existing 5.5m high plastered brick wall and glazed brick plinth along the eastern elevation (Penrose Street) would be retained to enclose the gardens and form the eastern gable of the new terraced housing.

Planning history

- 11 Planning permission was refused on demolition of existing building and construction of 9 dwellings (9 x 3 bedroom) three storeys in height; associated refuse storage, cycle parking and landscaping. The application was refused for the following reasons:
- 12 The proposed buildings, by reason of their mass, bulk and detailed design, would fail to respond positively to their surroundings. The inappropriate scale and design of the building would be an incongruous feature within the street scene and would fail to achieve a high quality of either architectural or urban design. Furthermore, the ungainly bulk of the proposed buildings, and their proximity to the listed building at 33 Penrose Street, would unacceptably harm its setting.
- 13 The scheme would fail to provide an acceptable standard of accommodation to future occupiers due to the proximity of rear facing windows and terraces, the lack of separation between the proposed dwellings would lead to unacceptable levels of overlooking between the houses and would potentially result in undue noise disturbance.

- 14 There have been various applications relating to the use of the building as a warehouse use pre-2000. More recently, in 2012 there has been a pre-application discussion regarding the retention of the building and addition of three floors to form residential flats.

Planning history of adjoining sites

- 15 36-38 Penrose Street:
11-AP-3723: A renewal of planning permission 08-AP-1656 dated 17/11/2008 was granted on 05/01/12 for ground and first floor rear extension, third and fourth floor front extension, roof-top extension, and conversion of building to commercial (Use Class B1) on ground and part first floor, with 9, two bedroom flats on part first floor and second, third, fourth and new fifth floor; with elevational alterations.
- 16 10-AP-0521: Planning permission was granted on 29/09/10 for the conversion and change of use of the existing building to provide 44 no. student accommodation units (including demolition of existing front outrigger, reconstruction of western wall, extension to roof, creation of basement and associated elevational alterations).

KEY ISSUES FOR CONSIDERATION

Summary of main issues

- 17 The main issues to be considered in respect of this application are:
- a) principle of development in relation to current land-use policies
 - b) amenity of nearby residents and users of the area, and amenity of future occupants of the site
 - c) transport Issues
 - d) design and conservation issues
 - e) sustainability
 - f) flood risk.

Planning policy

- 18 National Planning Policy Framework (NPPF)
Section 4. Promoting sustainable transport
Section 6. Delivering a wide choice of high quality homes
Section 7. Requiring good design.
Section 12. Conserving and enhancing the historic environment

London Plan July 2011 consolidated with revised early minor alterations October 2013

- Policy 3.3 Increasing housing supply
- Policy 3.5 Quality and design of housing developments
- Policy 5.3 Sustainable design and construction
- Policy 6.3 Assessing effects of development on transport capacity
- Policy 6.9 Cycling
- Policy 6.10 Walking
- Policy 7.4 Local character
- Policy 7.6 Architecture
- Policy 7.8 Heritage assets and archaeology
- Policy 7.14 Improving air quality

Policy 7.15 Reducing noise and enhancing soundscapes

Core Strategy 2011

Strategic Policy 2 – Sustainable transport
Strategic Policy 5 – Providing new homes
Strategic Policy 10 – Jobs and businesses
Strategic Policy 12 – Design and conservation
Strategic Policy 13 – High environmental standards

Southwark Plan 2007 (July) - saved policies

The Council's cabinet on 19 March 2013, as required by paragraph 215 of the National Planning Policy Framework (NPPF), considered the issue of compliance of Southwark Planning Policy with the NPPF. All policies and proposals were reviewed and the Council satisfied itself that the policies and proposals in use were in conformity with the NPPF. The resolution was that with the exception of Policy 1.8 (location of retail outside town centres) in the Southwark Plan all Southwark Plan policies are saved. Therefore due weight should be given to relevant policies in existing plans in accordance to their degree of consistency with the NPPF.

1.4 Employment Sites Outside the Preferred Office Locations and Preferred Industrial Locations

2.5 Planning Obligations

3.1 Environmental Effects

3.2 Protection of Amenity

3.11 Efficient Use of Land

3.13 Urban Design

3.12 Quality in Design

3.18 Setting of Listed Buildings, conservation areas and World Heritage Sites.

4.2 Quality of Residential Accommodation

4.3 Mix of Dwellings

5.2 Transport Impacts

5.3 Walking and Cycling

5.6 Car Parking

Residential Design Standards SPD 2011

Principle of development

- 19 The relevant land use policy would be 1.4, employment sites outside the preferred office locations and preferred industrial locations. Outside the preferred office locations, and preferred industrial locations, on sites which have an established B Class use and which meet any of the following criteria:
- i) The site fronts onto or has direct access to a classified road; or
 - ii) The site is within a Public Transport Accessibility Zone; or
 - iii) The site is within the Central Activities Zone; or
 - iv) The site is within the Strategic Cultural Area.

Development will be permitted provided that the proposal would not result in a net loss of floor space in Class B use.

- 20 Since none of the above criteria apply to the application site, there is no requirement to re-provide commercial floor space within B class use as part of this application.

Environmental impact assessment

- 21 None required due to the size of the site, which falls below the threshold of 0.5 hectares at which EIA is required by Schedule 2 of the EIA regulations 2011.

Impact of proposed development on amenity of adjoining occupiers and surrounding area

- 22 The Daylight and Sunlight assessment identifies key receptors (neighbouring windows affected by the development as being those on the front elevation of 40-44 Penrose Street (houses), and the front windows in the doctor's surgery at 33 Penrose Street. The report assesses sky component and annual probable sunlight hours. The impact on both of these properties is concluded to be negligible, and would not result in significant harm to occupiers. Officers are in agreement that the two sets of windows assessed are those most likely to be affected by the development, and agree that the report has assessed the likely impact effectively. There is not considered to be any significant harm to the amenity of nearby residents in this regard.
- 23 No other aspects of the scheme have been identified, that would impact on amenity of nearby residents.

Impact of adjoining and nearby uses on occupiers and users of proposed development

Noise and Air Quality

- 24 In view of the proximity of the site to the rail viaduct, which houses a number of industrial uses, a noise and air quality report has been submitted by the applicant. This demonstrates how the residents' internal amenity would be protected to ensure good internal noise levels. Measures incorporated into the building include mechanical ventilation, and a condition would be imposed to any recommendation for approval to require details of this. Air intake should be from less polluted facades.
- 25 The retention of the existing wall along Penrose Street would act as a noise barrier to the new dwellings and gardens of the proposed homes.

Transport issues

- 26 The site is proposed as car free with a loss of two existing car parking spaces. The site has a high PTAL of 5, is located within a CPZ. Therefore in this instance the car free development is considered acceptable and supported by policy.
- 27 The proposal site is situated in a CPZ. Therefore, in order to prevent possible overspill parking from the development and encourage the use of the available sustainable modes, a planning condition would be imposed preventing occupiers of this development being eligible for on-street parking permits.
- 28 Any existing access which will be made redundant as a result of this development must be reinstated, with Highways approval. In addition to planning consent, any new or altered access must have the approval of the highways authority, before construction. An informative to this effect would therefore be attached to any recommendation for approval

- 29 No on site servicing is provided, however given the nature of the proposed development and the location of the bin stores it is not thought there will be many service vehicle movements associated with the above application; or refuse vehicles stationary in the highway for an extended period.
- 30 It was noted on site there were some bollards stopping up the road on Penrose Grove, this resulted in the commercial car business using this space to park cars. In order to provide access for refuse vehicles to the proposed houses it was considered better to remove these bollards to allow traffic to pass through. Highway officers and the applicant have agreed to a condition which would require the applicant to pay for this work to be undertaken. A condition to this effect is added to the recommendation should members be minded to grant approval.
- 31 Bin stores and cycle storage are considered adequate and appropriate for this development. The scheme is considered to be in accordance with saved policy 5.2 transport impacts, 5.3 walking and cycling, and 5.6 car parking of the Southwark Plan 2007, and SP2 sustainable transport of the core strategy 2011.

Design issues

- 32 The NPPF stresses the importance of good design and states in paragraph 56 that: *“Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people.”*
- 33 Policy SP12 of the core strategy states that *“Development will achieve the highest possible standards of design for buildings and public spaces to help create attractive and distinctive places which are safe, easy to get around and a pleasure to be in.”*
- 34 Saved policy 3.13 of the Southwark Plan asserts that the principles of good urban design must be taken into account in all developments. This includes the height, scale and massing of buildings, consideration of the local context, its character and townscape as well as the local views and resultant streetscape.
- 35 The existing sorting office fronting onto Penrose Street would be retained and repaired where necessary. This is considered appropriate in terms of height, scale and massing and welcomed as a positive contribution to the local townscape. The success of this will be subject to the materials chosen to replace the existing fabric where necessary and the way in which they are detailed to match the existing. This can be controlled by condition.
- 36 According to the submitted material, the roof on the old sorting office needs to be replaced. The proposals state that it will be overhauled and made good in materials to match existing. This is welcomed, but as a low building, the roof is particularly visible from the surrounding townscape and therefore the details of the proposed replacement should also be controlled by condition.
- 37 The new annexe building, proposed between the old sorting office and the listed building at 33 Penrose Street would only be one storey in height. It would be set very slightly behind the building line of the listed building (although the entrance porch, some distance away, would protrude beyond this). Although the current gap between the two buildings would be filled in by this addition, its modest scale and subservient character would not cause any harm to the existing townscape.

- 38 The design for the terraced houses has been modified during the course of the application, the changes have focused on the design of the rear elevation, specifically the roof and the impact this would have on the setting of the listed building and the Penrose Street elevation. Following these revisions, the redesigned simpler roof form is considered to have addressed officer's initial concerns and is not considered to be harmful to the street scene or the listed building.

Impact on character and setting of a listed building and/or conservation area

- 39 The application site is considered to be within the setting of the directly adjacent Grade II listed building at 33 Penrose Street. The proposals are therefore subject to Saved Policy 3.18 of the Southwark Plan which states that permission will not be granted for developments that would not preserve or enhance the immediate or wider setting of a listed building. The retention of the more prominent parts of the former sorting office together with the redesign of the new terrace of buildings to the rear are considered to preserve and enhance the existing listed building at no. 33 Penrose Street.
- 40 Paragraph 135 of the NPPF states that “the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application”.
- 41 Although it is neither listed nor within a conservation area, the proposals would preserve and enhance the existing building on the site. Concerns have been raised about the loss of the former sorting office building and it is recognised that the building is of merit and local historical significance. This application is considered to retain the best elements of the former sorting office, (the main front building onto Penrose Street and the wall along Penrose Grove). This makes a considerable contribution to the preservation of the setting of the listed building and is therefore welcomed.

Sustainable development implications

- 42 A code for unsustainable Homes level 4 pre-assessment has been submitted and a condition would be attached to require a post-completion report to this effect.

Other matters

Previous reasons for refusal

- 43 The 2013 application cited two reasons for refusal, firstly around the mass and bulk of development proposed and secondly in respect of the quality of accommodation and lack of privacy between the two rows of terraced houses.
- 44 This scheme has retained and converted most of the existing sorting office building and in principle, this is considered to represent efficient use of land whilst retaining the most of the non designated heritage asset on the site and respecting the setting of the neighbouring listed building. The living accommodation is generous and generally meets or exceeds that expected in the Southwark residential standards SPD.
- 45 The potential for overlooking between the converted sorting office and the proposed terraced housing and rear gardens is mitigated by the use of high level obscured windows in the existing building. Thanks to the size of the openings in the existing building and the proposal for a walled winter garden and roof lights in the annexe, this should not compromise the quality and amount of daylight and sunlight received.

- 46 It is acknowledged that the amenity space for the houses fronting Penrose Grove are limited in size being 25sq metres, which is half of the size suggested for housing within the residential design guide SPD, the dwellings do also benefit from a terrace of approximately 6.5sq metres, which brings the total amount of private amenity space available to around 31.5sq metres.
- 47 The two dwellings, housed within the converted section of the sorting office and single storey annexe would benefit from gardens of 34 and 45sq metres looking onto Penrose Street, whilst not ideal given the very urban location it is not considered that this is sufficient to constitute a refusal of permission.

Other issues

- 48 The recommended density for the site is 200-700 habitable rooms per hectare. The proposal would result in a density of 457hrph which is well within the density range for the area.
- 49 Flood Risk - the site is located within Flood Risk Zone 3. Zone 3 is a high risk area but benefits from River Thames tidal flood defences. Despite these, residual flooding can still occur but these occurrences fall outside the remit of the environment agency.
- 50 Ecology - A Phase 1 Habitat Survey, as well as a Bat Survey, have been completed. This identifies that the building on site provides little or no potential for roosting bats, nesting birds newts or reptiles.
- 51 CIL - The applicant's CIL form gives 838.48sqm as the proposed residential floor space. The existing uses on site (which have been in lawful use for the minimum period of 6 months in the 2 years prior to the application) are given as 530.3sqm. This can therefore be offset. The CIL liable floor space is therefore 308.18sqm. At Southwark's rate of £35 per sqm, this would be £10,786.

Conclusion on planning issues

- 52 The proposal has sought to address the two previous reasons for refusal, this has resulted in the retention and reuse of most of the former sorting office building, whilst also providing new family sized residential accommodation. The concerns of objectors around the loss of the building are noted, but given the attempt by the applicant to take on board those concerns and to overcome the previous reasons for refusal it is not considered that the loss of part of the building would outweigh the benefit of providing new residential accommodation. It is therefore recommended that planning permission be granted.

Community impact statement

- 53 In line with the council's community impact statement the impact of this application has been assessed as part of the application process with regard to local people in respect of their age, disability, faith/religion, gender, race and ethnicity and sexual orientation. Consultation with the community has been undertaken as part of the application process.

a) The impact on local people is set out above.

b) The following issues relevant to particular communities/groups likely to be

affected by the proposal have been identified as above.

- c) The likely adverse or less good implications for any particular communities/groups have been also been discussed above.

Consultations

- 54 Details of consultation and any re-consultation undertaken in respect of this application are set out in Appendix 1.

Consultation replies

Details of consultation responses received are set out in Appendix 2.

Summary of consultation responses

Letters were received from 3 objectors and the Walworth Society, full commentary is included within the appendix 2 of the officer report.

- The proposal would result in the significant harm to a local historic building
- No parking is provided for residents
- The proposal is out of character with the local area

Human rights implications

- 55 This planning application engages certain human rights under the Human Rights Act 2008 (the HRA). The HRA prohibits unlawful interference by public bodies with conventions rights. The term 'engage' simply means that human rights may be affected or relevant.
- 56 This application has the legitimate aim of providing new residential dwellings. The rights potentially engaged by this application, including the right to a fair trial and the right to respect for private and family life are not considered to be unlawfully interfered with by this proposal.

SUPPLEMENTARY ADVICE FROM OTHER OFFICERS

- 57 None.

BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
Site history file: TP/1384-31 Application file: 14/AP/1726 Southwark Local Development Framework and Development Plan Documents	Chief Executive's Department 160 Tooley Street London SE1 2QH	Planning enquiries telephone: 020 7525 5403 Planning enquiries email: planning.enquiries@southwark.gov.uk Case officer telephone: 020 7525 5434 Council website: www.southwark.gov.uk

APPENDICES

No.	Title
Appendix 1	Consultation undertaken
Appendix 2	Consultation responses received
Appendix 3	Recommendation

AUDIT TRAIL

Lead Officer	Gary Rice, Head of Development Management	
Report Author	Sonia Watson, Planning Team Leader	
Version	Final	
Dated	8 January 2015	
Key Decision	No	
CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER		
Officer Title	Comments Sought	Comments included
Strategic Director, Finance and Corporate Services	No	No
Strategic Director, Environment and Leisure	No	No
Strategic Director, Housing and Community Services	No	No
Director of Regeneration	No	No
Date final report sent to Constitutional Team		8 January 2015

Consultation undertaken

Site notice date: 24/06/2014

Press notice date:

Case officer site visit date: 16/07/2014

Neighbour consultation letters sent: 13/06/2014

Internal services consulted:

Design and Conservation team
Transport Planning Team
Environmental Protection Team

Statutory and non-statutory organisations consulted:

Network Rail

Neighbours and local groups consulted:

PENROSE SURGERY 33 PENROSE STREET LONDON SE17 3DW
43 PENROSE STREET LONDON SE17 3DW
36-38 PENROSE STREET LONDON SE17 3DW
48 PENROSE STREET LONDON SE17 3DW
36A PENROSE STREET LONDON SE17 3DW
REAR OF 37 PENROSE STREET LONDON SE17 3DW
RAILWAY ARCH 205 PENROSE STREET LONDON SE17 3EZ
RAILWAY ARCHES 208 TO 209 PENROSE STREET LONDON SE17 3EZ
RAILWAY ARCH 206 PENROSE STREET LONDON SE17 3DW
RAILWAY ARCH 203 PENROSE STREET LONDON SE17 3EZ
RAILWAY ARCH 204 PENROSE STREET LONDON SE17 3EZ
37 PENROSE STREET LONDON SE17 3DW
39 PENROSE STREET LONDON SE17 3DW
35 PENROSE STREET LONDON SE17 3DW
RAILWAY ARCH 210 PENROSE GROVE LONDON SE17 3EZ
31 PENROSE STREET LONDON SE17 3DW
40 PENROSE STREET LONDON SE17 3DW
45 PENROSE STREET LONDON SE17 3DW
46 PENROSE STREET LONDON SE17 3DW
44 PENROSE STREET LONDON SE17 3DW
41 PENROSE STREET LONDON SE17 3DW
42 PENROSE STREET LONDON SE17 3DW

Re-consultation:

n/a

Consultation responses received

Statutory and non-statutory organisations

Network Rail - no response

Neighbours and local groups

41 Penrose Street - Objects

The application is incomplete. It should not be considered without the elevation drawings (and street scene) of Penrose Street facing south including the three storey buildings at the rear. These do not currently appear in the drawings. I would object to any decision taken without this information as it impacts the street scene from Penrose Street.

The schedule of materials for elevation E appears to be incomplete. How will this look from Penrose Street? What materials will the frontage be made of and will they be in keeping with the brick houses surrounding?

There is no provision for parking for any of the residents of the proposed properties. There needs to be at least one parking space for each dwelling even if it is on street. None of the street frontage appears to be available for parking.

Brandon Street - Objects

I write to reiterate my opposition and objection to this planning application. This application is similar to the previous one affecting this old Post Office building, which I opposed on application 13/AP/2515. This application of 8 dwellings (6 three storey brick x 3 bedroom terrace houses and 2 converted three bedroom houses). The architecture doesn't fit in with the adjacent Victorian properties or houses facing. In opposing any part of this historical building asset built in the 19th century (1887) by Sir Henry Tanner, Head Architect for the Post Office who built and designed many fine buildings for them. He was also Chief Architect to Government designing with distinction. So I oppose and object to any part of this authentic building being removed or demolished and being replaced by houses of poor design.

33 Penrose Street - Objects

We believe the old Royal mail sorting office is a building of historical interest, and it would be a shame to see it damaged in any way. We do however acknowledge that something positive should be done with the site and we therefore echo and endorse the comments of the Walworth Society which I think have been made after careful consideration.

Walworth Society - Objects

The Walworth Society commented on the previous application for this site (13/AP/2515) which included the complete demolition of the existing historic sorting office building. Underpinning our objection to that scheme was a substantial amount of original historical research, which demonstrated the historic significance and architectural value of the building. The Walworth Society accepts English Heritage's decision that the building did not meet the exacting criteria which would make it listable as a building of national significance. However, we do welcome their acknowledgment of its local value. We also recognise that Southwark does not as yet have an up-to-date active register of 'locally

listed' buildings. However, the Council will be aware of our ambitions to work closely with them at their earliest possible convenience to establish this list for our local area (and we have already submitted a proposed draft list for their consideration). Although No 31 is not yet technically included on a 'local list' we note that both the NPPF Annex and the NPPG recognise such lists as only being one possible mechanism for identifying some non-designated assets, but it is clear that this is not the only way.

Along with a number of statutory consultees (including the Victorian Society and the Ancient Monuments Society) the Walworth Society made a clear and convincing case that Sir Henry Tanner's building, though not nationally significant, is certainly of local importance and it should be considered to be a non-designated heritage asset.

We would like it to be noted that this matter was of such interest that the Walworth Society requested and was accepted to make a representation to the meeting of the Borough, Bankside and Walworth Community Council held on Saturday 1 February 2014 at 1.00 pm at St Saviour's & St Olave's School, New Kent Road, London SE1 4AN. At that meeting (and we quote directly from the meeting minutes), it was resolved:

That this community council recognises the particular local heritage significance of the old Walworth sorting office on Penrose Street (acknowledged both by English Heritage and the Victorian Society), and desires to protect the building from demolition by developers.

We remain concerned that all steps have not been taken to remove the element of demolition from these plans and rather to integrate more fully the sorting office building into the development in the way that we outline below in our Comments on the Proposal.

POLICY

Paragraph 135 of the NPPF states that "*the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application*". Paragraph 137 of the NPPF states that "*local planning authorities should look for opportunities for new development... within the setting of heritage assets to enhance or better reveal their significance*"

COMMENTS ON PROPOSALS

We recognise that this proposal represents a substantial improvement upon the previous scheme, specifically through retention of a proportion of the historic sorting office premises. We recognise that this approach will certainly be less harmful to the historic character and integrity of the Penrose Street streetscape and the setting of the adjacent GII listed building. However, we continue to have concerns over the extent of the demolitions proposed to the historic sorting office and that this new massing will detract from its integrity and visual coherence, particularly in more oblique views from the west along Penrose Street (best seen in the massing studies shown in the applicant's daylight/sunlight assessment). We strongly recommend that consideration is given to retaining a higher proportion, or indeed all, of the rear volume of the sorting office. If this is proved to be structurally unviable, that a proportion is re-built to match the existing. We suggest that provision of communal amenity space for residents, in courtyard form, could enable a higher quantum of development whilst also securing a higher proportion of the non-designated heritage asset (within the spirit of an enabling-development approach).

CONCLUSION

The proposals represent a clear improvement to the previously committed scheme

however we continue to have concerns that the development will result in undue levels of harm to an important local non-designated heritage asset. We would welcome an opportunity to engage with the applicant and the Council to evolve these plans further as we feel there is clearly scope for development upon this site which our community could actively support which would also better protect this historic asset in the way that they local community and its representatives have so clearly envisaged in the very recent past.