

<b>Item No.</b> 6.2	<b>Classification:</b> Open	<b>Date:</b> 1 March 2016	<b>Meeting Name:</b> Planning Committee
<b>Report title:</b>	<b>Development Management planning application:</b> Application 15/AP/3886 for: Full Planning Permission  <b>Address:</b> 25-29 HARPER ROAD, LONDON, SE1 6AW AND CROWN COURT, SWAN STREET, LONDON SE1 1DF  <b>Proposal:</b> Demolition of the existing former Sorting Office and Former Court building and redevelopment to provide 64 residential units (2 studios, 20 x 1b2p, 29 x 2b4p, 8 x 3b5p, 4 x 4b5p, 1 x 4b6p) in three blocks of 4, 5 and 7-storeys in height plus lower ground floor; 299sqm of B1 floorspace together with associated amenity space, landscaping and related ancillary works.		
<b>Ward(s) or groups affected:</b>	Chaucer		
<b>From:</b>	Director of Planning		
<b>Application Start Date</b> 06/10/2015		<b>Application Expiry Date</b> 05/01/2016	
<b>Earliest Decision Date</b> 15/11/2015		<b>Planning Performance Agreement Date:</b> 31/03/2016	

## RECOMMENDATIONS

1.
  - a) That planning permission be granted, subject to conditions and the applicant entering into a satisfactory legal agreement.
  - b) In the event that a satisfactory legal agreement is not entered into by 31 March 2016, that the Director of Planning refuses planning permission, if appropriate, for the reason set out in paragraph 93 of the officer report.

## BACKGROUND INFORMATION

### Site location and description

2. The application site is located on the northern side of Harper Road and the western side of Swan Street. It consists of 25-29 Harper Road, an electricity substation, and the court house. The building at 25-29 Harper Road is in use as a parcel distribution centre with access from Swan Street and Trio Place, whilst the court house building is vacant.
3. The surrounding uses are predominantly residential; Newington Gardens park is on the opposite side of Swan Street. The site is adjacent to the Trinity Church Square Conservation Area, the boundary for which runs partially in front of the court house. It is

adjacent to the grade II listed Inner London Sessions Court, and is within the setting of listed buildings on Trinity Street and in Trinity Church Square. Borough High Street is approximately 75m to the west of the site.

### **Details of proposal**

4. Full planning permission is sought for the erection of a part 4, part 7-storey building plus basement comprising 64 flats and 299sqm of business floorspace, following the demolition of the existing buildings on the site. The proposed development is described in the submission as three connected blocks, 1, 2 and 3.
5. Block 1: This would be located on the corner of Harper Road and Swan Street and would be 7 storeys high with the top two floors set back (27m AOD). It would contain a residential lobby, B1 office floorspace and a substation at ground floor level, storage space and cycle parking at lower ground floor level, residential units on the upper floors and a roof garden. This block would be finished in a pale cream brick, with bronze aluminium window frames and glass balustrades to the balconies; the top two floors would be constructed of glass, steel and gold anodised aluminium. There would be a courtyard and parking area at the rear accommodating four accessible car parking spaces, accessed from Trio Place.
6. Block 2: This block would front Swan Street and would be 5-storeys high (19.41m AOD). It would be wholly residential, with duplex units spanning the lower ground and ground floor levels and a mix of flats and duplexes above. It would be finished in a light brown stock brick, with aluminium windows, reconstituted stone window lintels and projecting bay and a bronze anodised aluminium roof.
7. Block 3: This block would front Swan Street and would be 4-storeys high (16.41m AOD), sitting where the existing court building is located. It would contain duplex units at lower ground and ground floor levels and flats above. It would be finished with a soft red brick, with white aluminium windows and dark bronze zinc or anodised aluminium roof. There would be private and communal amenity space at the rear of blocks 2 and 3, running parallel with Trio Place.

### Amendments

8. The plans have been amended to incorporate a small turning head at the rear of the site on Trio Place, window sizes have been enlarged and balcony positions adjusted to the rear of block 1, and the lower ground floor levels in blocks 2 and 3 have been raised.

9. **Planning history**

01/AP/0915 Application type: Full Planning Permission (FUL) Alterations to Harper Road/Swan Street elevations
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Decision date 14/08/2001 Decision: Grant (GRA)
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06/AP/2303 Outline Permission was REFUSED on 28/03/2007 for the demolition of existing building and development of 50 residential units. The reasons for refusal comprise a lack of adequate detailed information to demonstrate that the development could be suitably accommodated on the site; failure to demonstrate that the scheme would not compromise the efficient development of Proposal Site 10P; the height and massing of the development would be out of character with the area; the proposal did not make adequate provision to mitigate its impacts; and the proposal lacked a transport assessment and travel plan, a sustainability assessment and a flood risk assessment.

10. Pre-application advice was provided in advance of this application, the details of which are held electronically by the Local Planning Authority. A number of meetings were held with the applicant prior to the submission of this application. Discussions centred around the provision of community floorspace, the layout, height, scale and massing of the development, impact upon neighbouring properties and nearby heritage assets, the quality of accommodation to be provided, affordable housing, and transport impacts.

#### **Planning history of adjoining sites of adjoining sites.**

11. 325 Borough High Street

13/AP/0145 Planning permission was GRANTED on 19/03/2013 for demolition of existing 3 storey (plus basement) building and the erection of a 6 storey (plus basement) mixed use development comprising: - Commercial [A1,A2 and B1] space at basement and ground level - 5 no. two bedroom residential apartment units on the floors above.

#### **KEY ISSUES FOR CONSIDERATION**

##### **Summary of main issues**

12. The main issues to be considered in respect of this application are:
- Principle in terms of land uses
  - Environmental impact assessment
  - Design and impact upon the setting of adjacent listed buildings and conservation areas
  - Density
  - Affordable housing
  - Housing mix
  - Quality of accommodation
  - Wheelchair accessible housing
  - Impact upon the amenity of neighbouring occupiers
  - Transport
  - Trees and landscaping
  - Planning obligations
  - Community infrastructure levy
  - Sustainable development implications
  - Archaeology
  - Flood risk

- Ecology
- Air quality
- Contaminated land
- Statement of community involvement

### **Planning policy**

13. The southern part of the site which contains 25-29 Harper Road forms part of proposal site 10P within the adopted Core Strategy, which also incorporates 23 Harper Road which adjoins to the west. It is designated for residential use with no other acceptable or permitted uses, and it has an estimated capacity of 60 units; the court house building is not subject to any particular land use designations. The site forms part of an archaeological priority zone (APZ), the central activity zone and an air quality management area.

14. National Planning Policy Framework (the Framework)

Section 1 - Building a strong, competitive economy

Section 4 - Promoting sustainable transport

Section 6 - Delivering a wide choice of high quality homes

Section 7 - Requiring good design

Section 8 - Promoting healthy communities

Section 10 - Meeting the challenge of climate change, flooding and coastal change

Section 11 - Conserving and enhancing the natural environment

Section 12 - Conserving and enhancing the historic environment

National Planning Policy Guidance (2014)

15. 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 3.6 Children and young people's play and informal recreation facilities

Policy 3.7 Large residential developments

Policy 3.8 Housing choice

Policy 3.9 Mixed and balanced communities

Policy 3.10 Definition of affordable housing

Policy 3.11 Affordable housing targets

Policy 3.12 Negotiating affordable housing on individual private residential and mixed use schemes

Policy 3.13 Affordable housing thresholds

Policy 3.16 Protection and enhancement of social infrastructure

Policy 5.7 Renewable energy

Policy 5.8 Innovative energy technologies

Policy 5.11 Green roofs and development site environs

Policy 5.12 Flood risk management

Policy 5.13 Sustainable drainage  
Policy 5.21 Contaminated land  
Policy 6.9 Cycling  
Policy 6.10 Walking  
Policy 6.13 Parking  
Policy 7.2 An inclusive environment  
Policy 7.3 Designing out crime  
Policy 7.4 Local character  
Policy 7.6 Architecture  
Policy 7.7 Location and design of tall and large buildings  
Policy 7.8 Heritage assets and archaeology  
Policy 7.21 Trees and woodlands  
Policy 8.2 Planning obligations  
Policy 8.3 Community infrastructure levy

16. Core Strategy 2011

Strategic policy 1 - Sustainable development  
Strategic policy 2 - Sustainable transport  
Strategic policy 4 - Places for learning, enjoyment and healthy lifestyles  
Strategic policy 5 - Providing new homes  
Strategic policy 6 - Homes for people on different incomes  
Strategic policy 7 - Family homes  
Strategic policy 11 - Open spaces and wildlife  
Strategic policy 12 - Design and conservation  
Strategic policy 13 - High environmental standards  
Strategic policy 14 - Implementation and delivery

Southwark Plan 2007 (July) - saved policies

17. The Council's cabinet on 19 March 2013, as required by paragraph 215 of the NPPF, considered the issue of compliance of Southwark Planning Policy with the National Planning Policy Framework. 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.

Southwark Plan (2007) - saved policies

1.1 - Access to employment opportunities  
2.1 – Enhancement of community facilities  
2.5 - Planning obligations  
3.2 - Protection of amenity  
3.3 - Sustainability assessment

- 3.4 - Energy efficiency
- 3.6 - Air quality
- 3.7 - Waste reduction
- 3.9 - Water
- 3.11 - Efficient use of land
- 3.12 - Quality in design
- 3.13 - Urban design
- 3.14 - Designing out crime
- 3.15 - Conservation of the historic environment
- 3.18 - Setting of listed buildings, conservation areas and world heritage sites
- 3.19 - Archaeology
- 3.28 - Biodiversity
- 4.2 - Quality of residential accommodation
- 4.3 - Mix of dwellings
- 4.4 - Affordable housing
- 4.5 - Wheelchair affordable housing
- 5.2 - Transport impacts
- 5.3 - Walking and cycling
- 5.6 - Car parking
- 5.7 - Parking standards for disabled people and the mobility impaired

18. Supplementary Planning Documents

- Section 106 Planning Obligations (2007)
- Sustainable design and construction SPD (2009)
- Sustainability assessments SPD (2009)
- Sustainable Transport SPD (2010)
- Residential Design Standards SPD (2011)
- Affordable housing SPD (2008 - Adopted and 2011 - Draft)
- Section 106 Planning Obligations/CIL SPD (2015 )
- Development Viability SPD (2015 – Draft)
- Trinity Church Square Conservation Area Appraisal

**Principle of development**

- 19. There is a pressing need for housing in the borough and a requirement under saved policy 3.11 of the Southwark plan to make an efficient use of land. Policy 3.3 of the London Plan supports the provision of a range of housing and sets the borough a target of 27,362 new homes between 2015 and 2025. This is reinforced through strategic policy 5 of the Core Strategy which requires development to meet the housing needs of people who want to live in Southwark and London by providing high quality new homes in attractive areas, particularly growth areas.
- 20. As already mentioned, the southern part of the site forms part of proposal site 10P within the adopted Core Strategy. It is designated for residential use with no other acceptable or permitted uses. In light of this, provision of residential uses on the

southern part of the site, although resulting in the loss of the existing parcel distribution centre, would be in accordance with the proposal site designation and would be acceptable in principle. Although B class floorspace is not included in the site designation, no objections are raised to its inclusion within the development, as it would provide employment opportunities for up to 25 people and an active frontage along Harper Road which is the busier of the streets which the site adjoins.

21. The court house building on the northern part of the site is not subject to any particular land use designations. It is noted that a representation submitted by the Trinity Newington Residents' Association (TNRA) refers to community use within the building, but this has not been included in the application which is for B class use and residential only. Policy 3.16 of the London Plan states that proposals which would result in a loss of social infrastructure in areas of defined need for that type of social infrastructure without realistic proposals for re-provision should be resisted. It advises that the suitability of redundant social infrastructure premises for other forms of social infrastructure for which there is a defined need in the locality should be assessed before alternative developments are considered. The Mayor's Social Infrastructure SPD puts the onus on boroughs to maintain an up-to-date list of local demand for community facilities, and at present the Council does not have such a list. In light of this, it cannot be demonstrated that the site is within a defined area of need for social infrastructure.
22. Saved policy 2.1 of the Southwark Plan is also relevant which seeks to protect D class floorspace. It states that planning permission for a change of use from D class community facilities will not be granted unless:
  - i) The applicant demonstrates to the satisfaction of the Local Planning Authority that the community facility is surplus to requirements of the local community and that the replacement development meets and identified need
  - ii) The applicant demonstrates that another local accessible facility with similar or enhanced provision can meet the identified needs of the local community facility users.
23. The existing court building provides 700sqm of D class floorspace. The submission advises that the Ministry of Justice terminated its lease on the building in 2014, having transferred the court functions to Camberwell Green Magistrates Court. The building has been vacant ever since and is now only used for file storage. As the court functions have been transferred to an enhanced facility in the borough, there would be no loss of court services and the proposal would be in accordance with saved policy 2.1 of the Southwark Plan.
24. In light of the above it is considered that in this instance it would be difficult to insist upon any D class floorspace within the development. It is also noted that the development would be liable to pay Southwark Community Infrastructure Levy (CIL) and that the Council's Regulation 123 list which identifies the types of projects which CIL money would be spent on includes schools, health care facilities, libraries and adult care facilities, all of which would fall under D class community uses. A Southwark CIL payment of £1,010,910 is due in this instance.

## **Environmental impact assessment**

25. In 2015 the Town and Country Planning (Environmental Impact Assessment (Amendment) Regulations were issued, which raised and amended the thresholds at which certain types of development project need to be screened in order to determine whether an environmental impact assessment is required.
26. EIA Development is defined as meaning either:
  - a) Schedule 1 development
  - b) Schedule 2 development likely to have significant effects on the environment by virtue of factors such as its nature, size or location.

The proposed development does not fall within the definition of Schedule 1 development (which includes developments such as power stations and waste transfer stations).

Schedule 2 development is defined by the EIA Regulations as:

Development of a description mentioned in Column 1 of the table in Schedule 2 where:

- a) any part of that development is to be carried out in a sensitive area; the site is not located in a sensitive area as defined by the Regulation; or
  - b) any applicable threshold or criterion in the corresponding part of Column 2 of that table is respectively exceeded or met in relation to that development.
27. Column 1 of the table in Schedule 2, Category 10 (b), relates to 'Urban Development Projects'. The proposed development would be an Urban Development Project and as such is development of a description mentioned in Column 1 of the table in Schedule 2. Consequently the proposed development would constitute Schedule 2 development within the meaning of the EIA Regulations if the corresponding threshold in Column 2 of the table in Schedule 2 is exceeded or met. The corresponding threshold was amended by the 2015 Regulations, the relevant part of which reads as follows:

In the case of urban development projects, the existing threshold of 0.5 hectares is raised and amended such that a project will need to be screened if:

- the development includes more than 1 hectare of development which is not dwellinghouse development
  - the development includes more than 150 dwellinghouses
  - the area of the development exceeds 5 hectares.
28. None of the above are applicable in this instance because the development would not include more than 1ha of development which is not dwellinghouse development, would not include more than 150 dwellinghouses, and the area of the development would not exceed 5ha (the site area is 0.23ha). In light of this no further screening is required and it is concluded that the development would not constitute EIA development.

## **Design and impact upon the setting of adjacent listed buildings and conservation areas**

29. The site consists of two buildings at the corner of Harper Road and Swan Street, a post-war commercial building used as a parcel distribution centre and the inter-war court building. The site falls within the setting of the Trinity Church Square Conservation Area which is located towards the north-eastern end of the site, extending to the opposite side of Swan Street. The Trinity Church Square Conservation Area is defined by the group value of a number of listed buildings and their relationship with the central square. The redevelopment of this site would also affect the setting of two grade II listed buildings, namely the Trinity Arms Public House (now converted for residential use) on Swan Street to the north of the site and the Inner Sessions Court House on Newington Causeway to the south. None of the buildings on the site are listed, but the court building has a fine 1930s red brick, symmetrical frontage with deep eaves, gauged lintels and grand stone entrance and makes a very positive contribution to the architectural and historic appearance of the streetscape; it is noted that concerns have been raised regarding the proposed demolition of this building. The immediate built context surrounding the application site is predominantly between 3 and 4 storeys in height, although it is acknowledged that the wider area is subject to development proposals of a taller order.
30. In terms of policy, 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." 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." Saved policy 3.11 states that all developments should ensure that they maximise the efficient use of land, whilst ensuring that, among other things that the proposal provides a satisfactory standard of accommodation and amenity for future occupiers of the site and positively responds to the local context and complying with all policies relating to design. It also goes on to state that the Local Planning Authority will not grant permission for development that is considered to be an unjustified underdevelopment or over-development of a site. Saved policy 3.13 of the Southwark plan asserts that the principles of good urban design must be taken into account in all developments which 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. Saved policy 3.15 states development should preserve or enhance the special interest or historic character or appearance of buildings or areas of historical or architectural significance and saved policy 3.18 states permission will not be granted for developments that would not preserve or enhance the immediate or wider setting of a listed building, important view(s) of a listed building, the setting of the Conservation Area or views into or out of a Conservation Area.
31. Officers raise no objection to the demolition of the existing parcel distribution centre or electricity substation as they make a limited contribution to the streetscene. The court building is however, considered to be of some historic and townscape merit, and as such its demolition would require convincing justification so that a balanced view can be taken.
32. The court building is a neo-Georgian, two storey soft red brick building with projecting

cornice supporting a large slate covered, pitched roof. It features fine metalwork details, stone dressings and two freestanding bronze lamps. The main entrance on Swan Street is embellished with a fine stone architrave and the Crown Coat of Arms above, and two stone lamp pillars flank the entrance. The rear elevation fronting onto Trio Place is finished in London stock brick and appears far more austere and functional, and was formerly used as the criminals' entrance. The court building is not statutorily listed or in a conservation area, but is nonetheless considered to be of some heritage significance. This is due to its historic value as a result of associations with legal institutions developed in the 19th and 20th centuries, and its aesthetic value in terms of its well preserved elevations, decorative fabric and the positive contribution it makes to the local townscape. Given this significance, it has been identified as an undesignated heritage asset.

33. Paragraph 135 of the NPPF requires "the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that affect directly or indirectly non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset."
34. The proposal which has been submitted can justify the loss of the building for two primary reasons:
  1. It would respond well to the role that the court building plays in the surrounding townscape, recreating its most positive contributions including visual interest and modulated massing, whilst enhancing activity along the Swan Street frontage.
  2. The decorative features considered to be of the most significance to the building would be retained and reused in a meaningful way as integral parts of the design, thus retaining both the historic fabric of value and the memory of the 19th and 20th Century legal institutions that have occupied this site. This would be realised as follows:
    - a) bronze lamps on stone piers would be re-used
    - b) projecting eaves detail proposed would match the existing building;
    - c) the use of matching red brickwork
    - d) provision of a pronounced central bay, with corner 'book-ends'
    - e) decorative stonework would be re-used around new entrances
    - f) existing decorative metal railings and stone bases would be re-used.
35. Furthermore, the submitted material demonstrates that the retention and conversion of the existing building would be compromised by its central core area and would result in a maximum of 10 residential units, with limited amenity space provision. Demolition of the building would allow for 14 larger, better quality units to be provided on this part of the site. It has also been demonstrated that the retention of the existing façade would conflict with desirable residential floor-to-ceiling heights and would preclude the introduction of lower ground floor accommodation. Replacing the façade would also allow extra entrances to be introduced at ground floor level and balcony amenity space to be provided.
36. Given the significance of the court building the applicant proposes to record and photograph it prior to demolition, in order to produce a report to be kept in the Local

Studies Library and Trinity House Archive; it is recommended that a condition be imposed upon any forthcoming permission to secure such recording.

37. Concerns have been raised that the proposed development would be too high, although officers consider that it would represent an appropriate response to the context of the site. Swan Street would have a three storey datum height, above which block 3 (in place of the court building) would have one additional set back storey and block 2 would have two additional set back storeys. At the corner of Swan Street and Harper Road it is considered that there is scope for increased height. The proposal for block 1 is therefore for a five storey datum height which would create a well defined street edge that would turn the corner. Above this there would be two additional set back storeys in the form of loggia fronted duplex units.
38. The roof profile would provide a good level of visual interest to the streetscene, with projections and set backs creating a dynamic rhythm and silhouette when seen obliquely. The site layout would provide dual aspect units with their frontages to Swan Street and amenity space at the rear facing Trio Place. The provision of through-lobbies at ground floor level would offer views to the landscaped areas on Trio Place, thus softening the overall street level experience and creating welcoming and legible communal entrances.
39. Each of the three blocks making up the development would be articulated differently as individual buildings, rather than one long terrace. This would result in a diverse street frontage and would enable the form of the court building to be expressed in the composition. It would also create a clear and legible strategy for the entrances to the development, with each block having a clearly distinguished communal entrance together with some individual front doors to blocks 2 and 3 fronting Swan Street; this approach would maximise activity and natural surveillance along Swan Street and is welcomed.
40. The entrance to block 1 would be from Harper Road which would give this road an appropriate status in relation to the development and is welcomed. Although a proportion of the Harper Road frontage would be taken up by bin store entrance, which has been raised as a concern by the TNRA, this would be mitigated by the generous entrance lobby to block 1 and the commercial unit which would turn the corner onto Swan Street.
41. *Saved policy 3.12 Quality in design* – As stated the proposed development would be expressed as three individual buildings, each with their own character and form. Each would be expressed in a slightly different way forming an articulated overall composition in which, when moving along Swan Street from north to south, the fenestration would become more open and the material palette lighter. Across all three blocks a predominantly brick material palette is proposed, with a good level of detailed articulation, deep window reveals, expressed cornice lines and string courses, and metal work to both recessed and projecting balconies. Detailed drawings and bay studies of each block have been provided to confirm these details, and in the event that planning permission is granted they should be specifically included in the approved plans list.
42. Block 1 would be finished in pale cream brick with matching flush pointed mortar, light bronze aluminium window frames and glass balustrades to the recessed balconies; light

bronze anodized aluminium to match the windows is proposed adjacent to the balconies. The top two storeys would be delivered as a setback loggia, providing vertical expression to 'crown' the building. The expressed loggia frame would be in steel and light gold anodized aluminium sections, with glass balustrades and slatted and perforated metal brise soleil elements. This would be a high quality material palette which would complement the other blocks within the scheme, and material samples should be secured by way of a condition.

43. Block 2 would mediate the difference in height between the taller block 1 to the south and block 3 to the north. Its top two floors would be arranged in the form of duplex apartments, which is welcomed. The three storey base of the building would be finished in a light brown stock brick with a slightly lighter contrasting flush pointed mortar. Above this the set back upper floors would be finished with colour matched reconstituted Portland precast stone cladding. The building would be unified by reconstituted stone copings lintels and cills and a combination of painted metal and glass balustrades. This material palette is welcomed in principle as a transitional element between blocks 1 and 3.
44. Block 3 in place of the existing court house would have a soft red brick base to match the existing building, with a contrasting metal roof in dark anodized aluminium. The windows would be white aluminium which would be fairly striking, but would pick up on the detail of the existing critical windows. Elements of the existing fabric would be conserved and reused, including the decorative metal railings and their Portland stone bases, the Portland stone plinth, the two freestanding bronze lights on stone piers and sections of stone moulding from the existing door surrounds and this is welcomed.
45. *Saved policy 3.18 Setting of listed buildings, conservation areas and world heritage sites* - The submitted material includes townscape and visual impact analysis, testing visually verified views of the proposal from within the Trinity Church Square Conservation Area and the settings of the surrounding listed buildings. The listed buildings potentially affected by the proposed development are:
  - 1) Inner London Sessions Court
  - 2) Nos. 2-12 Trinity Street
  - 3) Trinity Arms Public House, 29 Swan Street
  - 4) Listed houses on Trinity Church Square
  - 5) The Henry Wood Hall, Including Gate Piers and Railings.
46. Concerns have been raised regarding harm to the setting of the adjacent conservation area, however it is concluded that there would be no unjustifiable harm caused to the setting of any heritage assets. Taking each in turn:

The Inner London Sessions Crown Court (View 6)

The Sessions House is directly opposite the site to the south. It is grade II listed and dates from 1914-1921 (extended in 1954-58 and subsequently 1967-9). The main building is in a restrained classical style, in Portland stone. Its setting however, is somewhat harmed by an incongruous bronze vent shaft which sits in the forecourt.

The proposed development would be visible behind the Sessions House when viewed from Borough High Street. However, it would be perceived as a background element,

enclosing the street to the rear of the listed building and the composition of the listed building would remain the primary focus of the view. It is considered that the enhanced enclosure that the development would provide to Harper Road would enhance the setting of the listed building, and the orderly façade and restrained material palette for block 1 would represent a fitting response to the listed building without unduly competing with it. The upper two storeys of block 1 would be set well back from the main facades and would be of a contrasting appearance, and whilst they would be visible in more distant views, they would not constitute a dominant form in relation to the listed building.

#### Trinity Arms Public House (View 1)

This former public house is to the north-east of the site, at the junction of Swan Street with Trinity Street. It is grade II listed, built in 1810-1840, and was designed as a house and converted to a pub, before being converted to flats around 2000.

The proposed development would step down in height towards the Trinity Arms and the lower scale of townscape around it. The demolition of the existing court building would impact on the setting of this listed building, but as set out above it is considered that its replacement would reinstate the positive contribution that the existing building makes to the townscape. The replacement of the other existing buildings on Swan Street with those of a higher quality design would represent an enhancement to the setting of the listed building.

#### Henry Wood Hall, Trinity Church Square (View 2 and 3)

The Henry Wood Hall, previously known as Holy Trinity Church, is now in use as a concert hall following a fire and subsequent rebuilding inside in 1973-5. It was originally designed by Francis Bedford and was built in 1823-24 as a commissioner's church. It is built from Bath stone with a copper roof and is designed in the Greek revival style with a portico of 6 giant Corinthian columns on the north and a porch on the south. Externally, the tower above the north pediment is visually dominant.

The setting of the Hall would not be affected by the proposed development. The proposal would not be seen over the roofs of the adjoining listed terraces that frame Trinity Church Square when viewed from within the Square and whilst it would block the limited views of the clock tower from Newington Causeway, this is not considered to harm the setting of the listed building.

#### 2-12 Trinity Street

This terrace sits just north-west of the site and was listed grade II in 1996. Numbers 2-12 feel 'disconnected' from Trinity Church Square due to the mid 20th century development between it and the Square. Nonetheless, the terrace is a heritage asset of 'High Significance' due to its historic and aesthetic value.

These existing listed buildings are of sufficient height for the development not to be seen above their roof-tops from any direction. The only circumstance in which the proposed development would be seen with this terrace would be in views south-west along Trio Place. With the exception of the court building, the existing buildings along this street are of little value and of poor architectural quality. On balance, the new

buildings would enhance Trio Place and therefore enhance the setting of the listed terrace.

#### Houses in Trinity Church Square (Views 2 and 3)

The terraces that frame Trinity Church Square are grade II listed; they frame Henry Wood Hall and are consequently inward looking. The rhythm of the terraces, their design, massing, height and colour all contribute to their special interest whilst to the rear, the buildings are much plainer which is common in Georgian buildings. The verified views submitted with the application demonstrate that the proposal would not be seen over the roofs of the listed terraces.

#### The Trinity Square Conservation Area

As described in the adopted appraisal statement, the principal characteristics of the conservation area are 'the uniformity of design of its terraces and its two grand squares, softened by mature London plane trees running along the south side of Trinity Street' and the dramatic views into the conservation area, particularly from the west. The conservation area is considered to be 'dominated by the inward focus of the terraces' encompassing the two formal squares, with more modest terraces in Falmouth Road.

47. In general from the most significant locations in the conservation area the proposed development would not be visible. Certain oblique views would be possible from the western edge of the designated area, but it is not considered that these would be harmful to the significance of the area as a heritage asset. The demolition of the court building would have some impact, but it would be replaced with a building of similar character, colour, composition and scale. The other buildings to be demolished are considered to be of low quality and their replacement would therefore represent an enhancement of the setting of the conservation area and in views towards it.
48. Overall it is considered that the proposed development would be of a high quality design, which would preserve the setting of the adjacent listed buildings and the conservation area.

#### Comments of the Design Review Panel (DRP)

49. An earlier iteration of the scheme was presented to the panel on 3<sup>rd</sup> March 2015. The scheme was up to 8-storeys high on the corner with Harper Road, and included a 'mews' development fronting Trio Place, with 'back-to-back' units fronting Swan Street and Trio Place; the block fronting Swan Street had a similar detailed design to the listed buildings in Trinity Church Square.
50. The Panel questioned the height of the proposal and its impact on neighbouring heritage assets, and asked for verified views to be provided. They had significant concerns regarding over-development of the site and the quality of accommodation that would be created, and questioned the appropriateness of a cohesive terrace along Swan Street, suggesting that the site required a different approach with a mix of building types. Officers consider that the current proposal addresses the concerns raised.

## Density

51. Strategic policy 5 of the Core Strategy 'Providing new homes' permits a density range of between 650 – 1,100 habitable rooms per hectare (hrh) in the urban density zone.
52. The Southwark Plan sets out the methodology for calculating the density of mixed use schemes and requires areas of non-residential space to be divided by 27.5 to create an equivalent in terms of habitable rooms per hectare. Based on this methodology the density of the proposed development would equate to 908 habitable rooms per hectare which would be policy compliant.

## Affordable housing

53. Strategic policy 6 of the Core Strategy 'Homes for people on different incomes' requires at least 35% of the residential units to be affordable and at least 35% to be private. For developments of 15 or more units affordable housing is calculated as a percentage of the habitable rooms rather than total number of units, and further information can be found in the Council's draft Affordable Housing SPD (2011). In accordance with saved policy 4.5 of the Southwark Plan, for every affordable housing unit which complies with the wheelchair design standards one less affordable habitable room will be required. With regard to tenure, saved policy 4.4 of the Southwark Plan requires a split of 70% social rented: 30% intermediate. All of the affordable units should be provided on site and a mix of housing types and sizes for the affordable units would be required; saved policy 4.3 of the Southwark Plan advises that studio flats are not suitable for meeting affordable housing need.
54. The proposed development would provide 14 affordable housing units which would equate to 32% in terms of habitable rooms. These would be spread out across the three blocks, although most would be located in block 1. For the purposes of calculating affordable housing, where kitchens less than 11sqm are not counted and rooms larger than 27.5 sqm can be counted as two, there would be 198 habitable rooms within the development. In order to achieve 35% affordable housing the development would need to provide 69 affordable habitable rooms, although this could be reduced to 62 because seven wheelchair accessible affordable units would be provided. The proposal would provide 62 affordable habitable rooms and would therefore be policy compliant.
55. With regard to tenure split, out of the 62 affordable habitable rooms 44 would be social rented (71%) and 18 would be shared ownership (29%) which would be acceptable.

Units	Social rented	Affordable rented	Shared ownership	Total
1-bed	0	0	0	0
2-bed	0	1	6	7
3-bed	2	0	0	2
4-bed	5	0	0	5
<b>Total</b>	<b>7</b>	<b>1</b>	<b>6</b>	<b>14</b>

56. The proposal would provide a good mix of affordable units including family sized units which is a positive aspect of the scheme. A s106 agreement is recommended to secure

the delivery of these units, including a clause preventing more than 50% of the private units from being occupied until the affordable units have been completed. It is noted that when the application was first submitted it was supported by a viability appraisal which sought to demonstrate that the provision of shared ownership units in this location would not be affordable to residents. This was subsequently withdrawn and the applicant submitted a policy compliant affordable housing offer. The applicant has signed a declaration stating that the scheme can support the proposed level of affordable housing, as set out in the Council's draft Development Viability SPD.

### **Housing mix**

57. Strategic policy 7 of the Core Strategy 'Family homes' requires developments of 10 or more units to provide at least 60% 2+ bedroom units and 20% 3+ bedroom units. No more than 5% studio units can be provided and these can only be for the private housing. The proposal would provide the 3.1% studio units, 65.6% 2+ bed units and 20.3% 3+ bed units which would be policy compliant; a full breakdown is provided below:

- 2 x studios = 3.1%
- 20 x 1b2p = 31.25%
- 29 x 2b4p = 45.3%
- 8 x 3b5p = 12.5%
- 5 x 4b = 7.8%

### **Quality of accommodation**

58. Saved policy 4.2 of the Southwark Plan 'Quality of accommodation' requires developments to achieve good quality living conditions. The Council's Residential Design Standards SPD establishes minimum room and overall flat sizes, dependant on occupancy levels and the units should be dual aspect, to allow for good levels of light, outlook and cross-ventilation.

### Privacy

59. Owing to the L-shaped footprint of the proposed building there would be some close relationships of approximately 4m between north-facing windows in block 1 and west facing units in block 2. It is therefore recommended that details of a privacy screen or other device be conditioned for approval, to prevent any loss of privacy.

### Aspect/outlook

60. All of the proposed units would have a good level of outlook. The majority of units within the scheme (59%) would be dual or triple aspect and none of the single-aspect units within the scheme would be north-facing.

61. Unit sizes

<b>Units</b>	<b>Overall unit size sqm</b>	<b>SPD minimum sqm</b>	<b>Amenity space sqm</b>	<b>SPD minimum sqm</b>
<b>Studio</b>	44.9	39	5.9	10
<b>1-bed</b>	52-68.9	50	5-7.3	10
<b>2-bed</b>	75-136.6	61-70	8.3-8.1	10
<b>3-bed</b>	97-114	74-95	10.2-10.9	10
<b>4-bed</b>	124.7-148.6	90-117	10.5-17.6	10

All of the units would comply with or exceed the new nationally prescribed space standards and the individual room sizes would comply with the minimums set out in the Council's Residential Design Standard SPD. The majority of the units would have storage space in accordance with the SPD, and any shortfalls would be of around 0.1sqm which would be negligible. Not all of the units would have 10sqm of amenity space and this is discussed in the amenity space section below.

Internal light levels

62. A daylight and sunlight report based on the Building Research Establishment (BRE) Guidance has been submitted which considers light to the proposed dwellings using the Average Daylight Factor (ADF). ADF determines the natural internal light or day lit appearance of a room and the BRE guidance recommends an ADF of 1% for bedrooms, 1.5% for living rooms and 2% for kitchens.
63. The report advises that 91% of the rooms within the scheme would meet or exceed the recommended ADF level. Of those which would not meet the requirement, the shortfalls would not be significant, with a bedroom achieving 0.9%, kitchen / diners achieving 1.6%-1.7% and living rooms achieving 1%-1.4%.

Amenity space

64. Section 3 of the Residential Design Standards SPD sets out the Council's amenity space requirements for residential developments and states that all flat developments must meet the following minimum standards and seek to exceed these where possible:
- 50sqm communal amenity space per development
  - For units containing three or more bedrooms, 10sqm of private amenity space
  - For units containing two or less bedrooms, 10sqm of private amenity space should ideally be provided. Where it is not possible to provide 10sqm of private amenity space, as much space as possible should be provided as private amenity space, with the remaining amount added towards the communal amenity space requirement
  - Balconies, terraces and roof gardens must be a minimum of 3sqm to count towards private amenity space.
65. All of the units would have access to private amenity space and all of the 3+ beds would have 10sqm or more of private amenity space. Overall there would be a shortfall of 97sqm of private amenity space within the development, which would be compensated for through the 370sqm of communal provision in accordance with the approach set out

in the Residential Design Standards SPD; all residents within the development would have access to all of the communal amenity space, including the roof garden. The proposed amenity space parallel to Trio Place has been tested against the BRE guidance and would receive adequate sunlight.

66. Childrens' play space requirements are set out in the Greater London Authority's 'Shaping Neighbourhoods: Play and informal recreation SPG (September 2012). All of the playspace requirements for children of 0-4 years old would be met on site together with part of the requirements for children aged 5-10 years. This would be in the form of doorstep playspace fronting Trio Place, which would be a grassed area containing tactile and sensory planting and informal play equipment such as sculptural boulders. To meet the shortfall for 5-10 year olds and to provide for children aged 11-18 years a contribution of £24,009 is proposed in accordance with the Council's Planning Obligations and CIL SPD, and a clause to secure this has been included in the draft s106 agreement.

#### Noise

67. A noise assessment report has been submitted with the application which considers external noise sources which could affect the proposed housing. It concludes that external noise levels at the site are relatively low, and that sound insulation requirements for the new dwellings should not be particularly onerous. The report has been reviewed by the Council's Environmental Protection Team (EPT) which has raised some concerns about some its findings and conditions are recommended to address this including a condition to limit plant noise.

#### Secure by design

68. The application has been reviewed by the Metropolitan Police Secure by Design advisor who has requested that a condition be imposed requiring the development to achieve secure by design certification. It is recommended that such a condition be imposed in the event that planning permission is granted.

#### **Wheelchair accessible housing**

69. Saved policy 4.3 of the Southwark Plan requires at least 10% of all major new residential developments to be suitable for wheelchair users, except where this is not possible due to the physical constraints of the site.
70. There would be 7 wheelchair accessible units in the development, comprising 6 x 2-bed shared-ownership units and one 4-bed social rented unit. This would equate to 11%, exceeding the policy requirement which is welcomed. The social rented unit would need to be fully fitted out as such and the shared ownership units would be adaptable and a condition to secure this is recommended. All wheelchair units would need to be marketed as such which should be secured through the S106 agreement.

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

71. Strategic policy 13 of the Core Strategy 'High environmental standards' seeks to ensure

that development sets high standards for reducing air, land, noise and light pollution and avoiding amenity and environmental problems that affect how we enjoy the environment in which we live and work; saved policy 3.2 of the Southwark Plan states that permission will not be granted for developments where a loss of amenity, including disturbance from noise, would be caused. The adopted Residential Design Standards SPD expands on policy and sets out guidance for protecting amenity in relation to privacy, daylight and sunlight.

#### Daylight and sunlight

72. The daylight and sunlight report submitted with the application considers the impact of the development on the following buildings:

10-12 Trinity Street  
16-20 Trinity Village  
29 Swan Street  
1-20 Gloucester Court.

73. The following tests have been undertaken:

Vertical Sky Component (VSC) - the amount of skylight reaching a window expressed as a percentage. The guidance recommends that the windows of neighbouring properties achieve a VSC of at least 27%, and notes that if the VSC is reduced to no less than 0.8 times its former value (i.e. 20% reduction) following the construction of a development, then the reduction will not be noticeable.

74. Sunlight - Annual Probable Sunlight Hours (APSH). This should be considered for all windows facing within 90 degrees of due south (windows outside of this orientation do not receive direct sunlight in the UK). The guidance advises that windows should receive at least 25% APSH, with 5% of this total being enjoyed during the winter months. If a window receives less than 25% of the APSH or less than 5% of the APSH during winter, and is reduced to less than 0.8 times its former value during either period and has a reduction in sunlight received over the whole year of greater than 4%, then sunlight to the building may be adversely affected.

75. Overshadowing - The BRE guidance advises that for an outdoor area to appear adequately sunlight throughout the year, at least half of the garden or amenity area should receive at least 2 hours of sunlight on 21st March. If an area would not meet the above and the area which can receive two hours of sun on 21st March is less than 0.8 times its former value, the loss of sunlight is likely to be noticeable.

#### 10-12 Trinity Street

76. All of the windows tested would comply with the BRE guidance in relation to VSC and APSH.

#### 16-20 Trinity Village

77. All of the windows tested would pass in relation to VSC and APSH. Some of the windows would see improvements to daylight and sunlight, owing to the building having a narrower footprint than the existing court house in order to provide amenity space

parallel with Trio Place.

#### 29 Swan Street

78. All of the windows tested would pass in relation to VSC, with some seeing improvements. The windows would pass in relation to APSH.

#### 1-20 Gloucester Court

79. Of the windows tested, six would fail in relation to VSC, with reductions ranging from 0.59 to 0.77. The report advises however, that these windows appear to serve small, dual aspect kitchens and that the rooms are likely to retain good levels of daylight. All of the windows would pass in relation to APSH. The proposal would comply with the BRE guidance in relation to the amenity space outside these buildings.

#### Privacy and overlooking

80. Except for a single window at top floor level which could be obscure glazed by way of a condition, no windows are proposed in the north elevation of the proposed building facing 16-20 Trinity Village. There would be a substantial terrace serving this unit (67sqm), and a condition for a privacy screen is recommended. Although large, it would serve a single unit and it is not therefore considered that any undue noise or disturbance would occur. Balconies at the rear of the proposed building would be approximately 10m from windows in the rear elevation of 16-20 Trinity Village, therefore privacy screens should also be conditioned for the closest balconies to prevent any overlooking. There would be separation distances of 14m and 16m to Gloucester Court and 29 Swan Street on the opposite side of the road, in excess of the 12m recommended in the Residential Design Standards SPD to maintain privacy where properties face each other across a street.
81. The area to the west of the site is occupied by a police station on the opposite side of Trio Place, and office space and car parking. There would be 9m between the proposed balconies and the nearest building within the police station complex which would be a close relationship; there would be just under 12m window-to-window distance. It is not known exactly how the building is used, but the Metropolitan Police Secure by Design Advisor has not raised any objections to the proposal.
82. The adjoining site to the west forms part of the proposal site designation and is likely to come forward for redevelopment in the future. It is not considered that the proposed building would blight the redevelopment potential of this adjoining site as the only windows proposed in the western elevation of block 1 would be in the top two floors, set a minimum of 8m off the boundary.

#### **Transport issues**

83. Strategic policy 2 of the Core Strategy seeks to encourage walking, cycling and the use of public transport rather than travel by car, to help to create safe, attractive, vibrant and healthy places for people to live and work, by reducing congestion, traffic and pollution. Saved policy 5.2 of the Southwark Plan seeks to ensure that developments do not result in adverse highway conditions; 5.3 requires the needs of pedestrians and cyclists to be considered and 5.6 and 5.7 relate to car parking. The site has a PTAL (public transport

accessibility level) of 6a (high) and is located in a controlled parking zone (CPZ).

#### Vehicular access

84. Vehicular access to the site would be from Trio Place at the rear and no objections are raised in this regard. The parking area and amenity space at the rear of block 1 would only be accessible to residents; therefore the plans have been amended to include a small turning area within the site. In the event that a motorist was to drive along Trio Place in error, this would avoid them having to reverse back out onto Trinity Street.

#### Servicing

85. Being a predominantly residential development, servicing requirements are likely to be low and would take place from Harper Road and Trio Place. No objections are raised to this arrangement, although EPT has recommended a condition limiting the servicing hours to ensure that there would be no loss of amenity to neighbouring occupiers.
86. Internal refuse stores would be provided, the sizes of which have been calculated in accordance with the Council's standards. Collection would take place from Harper Road and Swan Street and no objections are raised to this. It is noted that the TNRA has requested that refuse storage be provided for existing properties on Trinity Street, but this would not be necessary in planning terms and could not be insisted upon.

#### Cycle parking

87. Under the London Plan there would be a requirement for 88 cycle parking spaces to serve the residential units, including two short-stay spaces, and two spaces to serve the B class floorspace. The scheme would provide 102 cycle parking spaces within the development spread across the three blocks, although it is not clear where the B class cycle storage would be as ideally, this should be at ground floor level; a condition for details is therefore recommended. It is noted that there is a cycle hire docking station to the south of the site on the opposite side of Harper Road, with a capacity for 42 bicycles.

#### Car parking

88. The site is located in a highly accessible location in the central activity zone. The only parking to be provided would be four scooter and four accessible car parking spaces for the wheelchair units, 20% of which should be secured with electric vehicle charging points by way of a condition. Further conditions preventing future occupiers from being able obtain parking permits and to secure the implementation of a travel plan with a 10% cycling target are recommended, together with a clause in the s106 agreement to provide 3 years car club membership for each eligible adult within the development. These measures would help to encourage sustainable modes of travel to and from the development.

#### **Trees and landscaping**

89. Saved policy 3.13 of the Southwark plan requires high quality and appropriately designed streetscape and landscape proposals.

90. The landscaping proposed for the development is welcomed. New communal garden and courtyard spaces would be created on Trio Place, with the communal garden defined by relatively generous threshold spaces to the residential units which would back onto it. Whilst not necessarily the largest communal open space, it would have the potential to offer some meaningful amenity value, especially when complimented by a roof terrace on block 1. The boundary treatment would be particularly important, as Trio Place is generally poorly overlooked at present. The plans show that 1800mm high railings are proposed, which would provide some privacy without deadening the street environment by allowing some views through.
91. There is a large London Plane Tree in front of the site on Harper Road and the building would be set sufficiently far back to allow for its retention. An arboricultural impact assessment submitted with the application shows that only minor works to this tree would be required, to which no objections are raised. There are two smaller street trees along Swan Street which would also be retained, and a condition for a construction method statement would ensure the protection of all of these trees during construction. Overall the landscaping details provided at this stage are considered to be acceptable, and a condition for full details including plant species and planting densities is recommended.

#### **Planning obligations (S.106 undertaking or agreement)**

92. Saved policy 2.5 'Planning obligations' of the Southwark Plan and policy 8.2 of the London Plan advise that Local Planning Authorities should seek to enter into planning obligations to avoid or mitigate the adverse impacts of developments which cannot otherwise be adequately addressed through conditions, to secure or contribute towards the infrastructure, environment or site management necessary to support the development, or to secure an appropriate mix of uses within the development. Further information is contained within the Council's adopted Planning Obligations and Community Infrastructure Levy SPD. A s106 agreement is currently being drafted which should include clauses to secure the following:
- The provision of affordable housing
  - Marketing of the wheelchair units
  - Car club membership
  - Employment and training provisions during construction
  - A s278 agreement to secure highway works to support the development including repaving along Harper Road, Swan Street and Trinity Street
  - An archaeology contribution of £6,778
  - A children's playspace contribution of £24,009.
93. In the event that a satisfactory legal agreement has not been entered into by 31 March 2016 it is recommended that the Director of Planning refuses planning permission, if appropriate, for the following reason:

The proposal, by failing to provide for appropriate planning obligations secured through the completion of a S106 agreement, fails to ensure adequate provision of affordable housing and mitigation against the adverse impacts of the development through projects or contributions in accordance with saved policy 2.5 'Planning Obligations' of the Southwark Plan (2007), strategic policy 14 'Delivery and Implementation' of the Core

Strategy (2011), policy 8.2 'Planning obligations' of the London Plan (2015) and the Planning Obligations and Community Infrastructure Levy SPD (2015).

### **Mayoral and Southwark Community Infrastructure Levy**

94. Section 143 of the Localism Act states that any financial contribution received in terms of community infrastructure levy (CIL) is a material "local financial consideration" in planning decisions. The requirement for payment of the Mayoral or Southwark CIL is therefore a material consideration. However, the weight attached is determined by the decision maker. The Mayoral CIL is required to contribute towards strategic transport investments in London as a whole, primarily Crossrail, while Southwark's CIL will provide for infrastructure that supports growth in Southwark.
95. In this instance a Mayoral CIL payment of £214,512 and a Southwark CIL payment of £1,010,910 are due.

### **Sustainable development implications**

96. Policy 5.2 of the London Plan requires major developments to provide an assessment of their energy demands and to demonstrate that they have taken steps to apply the Mayor's energy hierarchy. Policies 5.5 and 5.6 require consideration of decentralised energy networks and policy 5.7 requires the use of on-site renewable technologies, where feasible. Of note is that developments must reduce their carbon dioxide emissions by 40% when compared to the 2010 Building Regulations requirement. The applicant has submitted an energy statement in support of the application and in relation to the Mayor's energy hierarchy, and the following is proposed:

#### Be lean (use less energy)

Measures including high levels of insulation, high performance glazing, low energy lighting and limited flow rates to water fittings to reduce hot water demand are proposed. These measures would reduce carbon dioxide emissions by 6.9% when compared to a scheme compliant with the Building Regulations.

#### Be clean (supply energy efficiently)

Combined heat and power (CHP) and gas boilers would be incorporated into the development to provide electricity and heat. It would reduce carbon dioxide emissions by 42.1% when compared to a scheme compliant with the Building Regulations.

#### Be green (use renewable energy)

As the development would achieve a carbon dioxide reduction of 49% through the energy efficiency measures and CHP, no renewable energy is proposed in this instance. The roof plan does include zones for photovoltaics, therefore these could be provided in the future if required.

97. Overall the scheme would reduce carbon dioxide emissions by 49% when compared to a scheme compliant with the 2013 Building Regulations, which would exceed the policy requirement.

98. In terms of Southwark's policies, strategic policy 13 of the Core Strategy 'High environmental standards' sets out a number of standards and those relevant to the proposed development are as follows:
- Office uses must achieve at least BREEAM 'excellent'
  - Major development must achieve a reduction in carbon dioxide of 20% from using on-site or local low and zero carbon sources of energy
  - Major developments must reduce surface water run-off by more than 50%
  - Major housing developments must achieve a potable water use
  - Target of 105 litres per person per day.
99. No information has been provided to demonstrate that the proposed office space would achieve BREEAM 'excellent', therefore a condition to secure this is recommended. As the proposal would reduce its carbon dioxide emissions by 49% in accordance with the London Plan no renewable energy is proposed, and there are no objections to this in this instance. Surface water run-off rates have not been provided, but the Council's Flood and Drainage Team has reviewed a flood risk assessment and drainage strategy submitted with the application and is satisfied with the information provided. The Code for Sustainable Homes (CSH) has recently been withdrawn, but a CSH pre-assessment has been submitted with the application. It advises that indoor water use would be 90 litres per person per day, to be achieved by specifying water efficient appliances such as WCs, taps and white goods, and a condition limiting water use in line with strategic policy 13 is recommended.
100. Saved policy 3.3 of the Southwark Plan advises that planning permission will not be granted for major development unless the applicant demonstrates that the economic, environmental and social impacts of the proposal have been addressed through a sustainability assessment; a sustainability checklist has been submitted in support of the application.
101. In terms of economic impacts, employment and training during construction would be secured through the s106 agreement, and the proposed office space would create job opportunities. A policy compliant amount of affordable housing would be provided and whilst no community floorspace would be included, a CIL payment which could potentially be put towards other D class uses would be required. The development would incorporate measures to reduce its carbon dioxide emissions and a condition to secure BREEAM 'excellent' for the office space is recommended.

### **Archaeology**

102. The site is located in an archaeological priority zone and is at an exceptionally interesting place within the Roman archaeology of Southwark. It is likely that this site contains the area where a burial ground, generally to the east and north of Harper Road, meets the settled area of the Roman town. At other adjacent sites on Swan Street areas of Roman ritual deposition have been found; these sites to the rear of the former post office on Borough High Street were excavated by Pre-Construct Archaeology and the findings have been published in London and Middlesex Archaeological Society transactions volume 57.
103. An archaeological report has been submitted in support of the application. Conditions

are recommended, together with a clause in the s106 agreement to secure a contribution of £6,788 in accordance with the Council's Planning Obligations and CIL SPD.

### **Flood risk**

104. The site is located in flood zones 2 and 3 and a flood risk assessment and drainage strategy have been submitted for approval. The documents have been reviewed by the Council's Flood and Drainage Team and the Environment Agency (EA), both of whom raised concerns regarding the adequacy of the information, provision of sleeping accommodation in the basement, impact of the basement on flooding, and surface water run-off. Additional information has been provided to address these concerns and neither the Flood and Drainage Team nor the EA report any objections to the proposal; conditions are recommended to ensure the development would be carried out in accordance with the information provided.

### **Ecology**

105. Saved policy 3.28 of the Southwark Plan states that the Local Planning Authority will take biodiversity into account in its determination of all planning applications and will encourage the inclusion in developments of features which enhance biodiversity, requiring an ecological assessment where relevant.
106. A biodiversity statement has been submitted in support of the application which concludes that the site supports negligible ecological value at present, containing only a narrow strip of vegetation which has low species diversity. The report recommends that any shrub clearance from the site should avoid the bird nesting season and an informative advising the applicant of this is recommended. A neighbouring resident raised concerns that the court building could be used by bats; therefore an additional survey was commissioned. No evidence of bats was found within the building and the report has been reviewed by the Council's Ecology Officer who agrees with its findings.
107. The proposed development has the potential to enhance the ecological value of the site and would incorporate landscaped areas, nest boxes, bee blocks and green roofs around the edges of the roof garden, all of which are welcomed.

### **Air quality**

108. The site is located in an air quality management area. An air quality assessment has therefore been undertaken which considers the potential air quality impacts arising from the construction and operational phases of the development. The report has been reviewed by EPT and conditions are recommended, including for a construction management plan and to monitor emissions from the CHP.

### **Contaminated land**

109. A desk-top study has been undertaken and submitted in support of the planning application. It has been reviewed by EPT and intrusive testing is required, and a condition to secure this is recommended.

## **Statement of community involvement**

110. A statement of community involvement has been submitted which sets out the consultation which the applicant undertook prior to the submission of the planning application. It advises that residential and business tenants and leaseholders within a 100m radius of the site, existing occupiers of the site, Trinity Newington Residents' Association, local ward councillors and Trinity Village Management Team were consulted. Public exhibitions were held on 9 October and 19 November 2014 and 2 January and 19 March 2015, with fliers sent out in advance. A number of changes were made to the scheme following consultation with the public, the Council and the Design Review Panel including a reduction in the height and mass of the development, omission of a 'mews' block fronting Trio Place and the articulation of blocks 2 and 3 as individual buildings.

## **Conclusion on planning issues**

111. The proposed development would be acceptable in land use terms and would provide much needed housing in the borough. Although there would be a loss of D class floorspace as a result, the wider benefits of the scheme including a policy compliant amount of affordable housing and the provision of office floorspace which would create job opportunities are considered to outweigh any harm caused in this instance. The proposal would be of a very high quality of design, with the demolition of the existing court building having been justified and a number of its existing features would be re-used within the proposed scheme. The proposal would preserve the setting of the adjacent listed buildings and Trinity Church Square Conservation Area, and is considered to be a good, contextual response to the site. The proposal would provide a good standard of accommodation including wheelchair housing, and no significant loss of amenity would occur to neighbouring occupiers. The site is well located for public transport, and no wider adverse transport impacts are anticipated. In light of this and for the reasons set out in full in the report, it is recommended that planning permission should be granted.

## **Community impact statement**

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

## **Consultations**

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

## **Consultation replies**

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

### Summary of consultation responses

115. Five representations have been received objecting to the proposal, including the response from Trinity Newington Residents' Association which is provided below. Grounds for objecting are:

- Unjustified loss of the attractive court building
- Increased noise
- Lack of one-to-one consultation with residents
- Structural impacts on neighbouring buildings (Officer response: This would be covered under the Building Regulations)
- Impact on the setting of adjacent listed buildings on Trinity Street
- Overdevelopment
- The scale of development would dominate its surroundings
- Inappropriate materials including reconstituted stone
- Development not as supported locally as the submission asserts
- Loss of light and privacy.

### Trinity Newington Residents' Association

116. The final scheme has made substantial steps forward compared to the original proposal and is of a much higher quality, more appropriate to the context, and better resolved. The number of residential units has been cut from 82 to 64. The "tower block" at the corner of Swan Street and Harper Road is now only five storeys with a 6th and 7th storey considerably set back. The Swan Street facade now reads as three separate buildings, adding to variety and interest: the northern most block is designed to echo the court building and will retain the pillars and bronze lights at the entrance and the railings.

117. The one area where the latest plans are a disappointment is refuse storage. At the second community meeting, the architects unveiled plans to provide new bin storage space for use by residents in Trinity Street as well as the residents of the development which would be accessible from Trio Place. The latest proposal envisages a bin store accessible by just the four flats in 16-18 Trinity Street, accessible from Swan Street. The dumping of rubbish by residents of Trinity Street to the west of Trio Place will still be a problem. We would like to see some space in Trio Place used as a refuse and recycling site for domestic and office refuse from 2-14 Trinity Street. Officer response: The refuse storage for the proposed development has been calculated in accordance with the Council's guidelines. Whilst it may be desirable for the scheme to provide refuse storage for existing neighbouring residents, this would not be necessary in planning terms and cannot be insisted upon.

### Highways Development Management

118. Issues to be resolved prior to consent - Provide a turning head on Trio Place to avoid 'lost' or visitor vehicles reversing into Trinity Street.

119. If consent is granted the developer must enter into a S278 agreement to complete the following works:

- Repaving of the footway fronting the development on Harper Road, Swan Street and Trinity Street including new kerbing.
- The paving slabs are to be concrete except for the junction of Swan Street and Trinity Road which is within a conservation area and they are to be conservation granite to match existing ones.
- Widen the footways along Swan Street and Trinity Street to provide a 450mm wide clearance for existing trees and street lighting columns and front of kerb face.
- Construct two raised pedestrian crossing tables at the junctions of Trinity Street and 16 Swan Street and Trinity Street and Trio Place to the relevant SSDM standards.
- Install flush edgings to all existing trees.
- Promote a Traffic Regulation Order to legalise the change in traffic restrictions
- Upgrade street lighting to current LBS standards.

#### General comments

120. The proposals include block paving of Trio Place except for a short length near the junction with Trinity Street. This section is likely to be damaged by construction traffic and should be resurfaced.

- No works are shown with regards to the footway on Trio Place which is currently in a poor condition. The kerbs would need to be re-aligned and re-levelled when the blocks are laid. It is recommended that the whole of Trio Place be block paved as a shared place.
- Gulley and utility covers are likely to be damaged by construction vehicles and may need to be replaced on both Swan Street and Trio Place.

121. There are single yellow lines on all the three roads fronting the development. A Traffic Management Order to regulate any changes made, in particular on Trio Place, will be required.

122. The application site falls within 'General' designation except for the junction of Swan Street and Trinity Street which falls under 'Heritage', therefore all footways fronting the development should be paved with concrete paving slabs with 150mm wide granite kerbs but the Heritage area must have granite kerbs to match the existing.

#### Flood and Drainage Team

123. Initial comment:

- Note that sleeping accommodation is to be provided within the basement. Generally, sleeping accommodation is not permitted at basement level in flood zone 3 (this is in line with EA guidance). Details of flood breach levels would be required for the team to undertake an assessment of the risks associated with provision of sleeping accommodation on the lower ground floor, and whether any further flood resistant / resilient measures will be required. Environment Agency (EA) modelled breach assessment information is available to determine the flood levels.

No consideration is given to whether the basement will impact on groundwater flow and flooding, or on any resultant impacts on surface water flow. As a minimum, it should be demonstrated that the basement does not extend into existing groundwater levels. If this is not the case, mitigation measures may be required to reduce the risk of any future groundwater impacts.

No details are provided on the existing runoff from site. Section 3.2.3 of the FRA states that "the proposed development would not lead to any increase in impermeable space and will not involve any change to the existing drainage arrangements." We would expect to see the proposed and existing surface water runoff from the site quantified to allow an assessment to be made on whether any reduction is feasible. Generally, Southwark expects the runoff to be limited to equivalent Greenfield runoff rates. However, we appreciate that given the relatively small area; this may not be feasible in this case.

124. Subsequent comment:

Comment closed following the submission of additional information.

London Underground

125. London Underground Infrastructure protection has no comment to make on this planning application. These comments relate only to the London Underground infrastructure protection issues raised by the application. They should not be taken to be representative of the position which may be taken by the Mayor and/or another part of TfL. You are advised to consider whether it is also necessary or appropriate to consult other parts of TfL and whether the application should be referred to the Mayor as an application of potential strategic importance pursuant to the provisions of the Town and Country Planning (Mayor of London) Order 2008.

Network Rail

126. The site is quite far from the railway line and there do not appear to be any tunnels nearby.

Historic England

127. This application should be determined in accordance with national and local policy guidance, and on the basis of your specialist conservation advice. It is not necessary for us to be consulted again on this application. However, if you would like further advice, please contact us to explain your request. We can then let you know if we are able to help further and agree a timetable with you. In returning the application to you without comment, Historic England stresses that it is not expressing any views on the merits of the proposals which are the subject of the application.

Transport for London

128. The site is situated on Harper Road and Swan Street which are in the local road network; the nearest section of the Transport for London Road Network (TLRN) is Great Dover Street, 200m north of the site. The nearest section of the Cycle Superhighway is Southwark Bridge Road, 300m west of the site. Having reviewed the application TfL has

the following comments:

The development proposed is to be car free except for 4 Blue Badge parking spaces which is supported by TfL, especially given the high PTAL score of 6b (measured on a scale of 1a – 6b where 6b is the highest). TfL request that the Blue Badge spaces are equipped with electric vehicle charging points.

Residents should be exempt from applying for parking permits (except Blue Badge holders) in the Controlled Parking Zone; this should be secured in the Section 106 agreement. The cycle parking provision of 106 cycle parking spaces for the residential element and 4 for the commercial element is in line with London Plan (2015) minimum standards. The inclusion of a Travel Plan, Construction Management Plan and Delivery and Servicing Plan as part of the planning application is supported by TfL, these should be secured in the Section 106 agreement.

#### Natural England

129. Natural England has no comments to make on this application. The lack of comment from Natural England does not imply that there are no impacts on the natural environment, but only that the application is not likely to result in significant impacts on statutory designated nature conservation sites or landscapes. It is for the local planning authority to determine whether or not this application is consistent with national and local policies on the natural environment. If the proposed works could, at any stage, have an impact on protected species, then you should refer to our Standing Advice which contains details of survey and mitigation requirements.

#### Environment Agency

130. No objections; detailed advice offered to the applicant.

#### London Fire and Emergency Planning Authority

131. The Brigade has no objections or comments to raise at this juncture.

#### 132. Metropolitan Police

133. The Metropolitan Police have read the design and access statement. Believe having reviewed the documents that there is no reason why this development should not achieve Secured by Design Part 2 physical security accreditation (even any listed buildings). Therefore seek to have a condition that states the development must achieve SBD certification .This is a vulnerable location; the Police Property service were contacted, hope that they have commented and advise on this particular matter.

#### Environmental Protection Team

134. Approval with conditions.

#### Thames Water

135. No objections. Informatives and a condition relating to impact piling recommended.

## Human rights implications

136. 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.
137. This application has the legitimate aim of providing 64 residential units and B1 class floorspace. 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.

## BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
Site history file: TP/1422-25 Application file: 15/AP/3886 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 5410 Council website: www.southwark.gov.uk

## APPENDICES

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

## AUDIT TRAIL

<b>Lead Officer</b>	Simon Bevan, Director of Planning	
<b>Report Author</b>	Victoria Lewis, Team Leader	
<b>Version</b>	Final	
<b>Dated</b>	17 February 2016	
<b>Key Decision</b>	No	
<b>CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER</b>		
<b>Officer Title</b>	<b>Comments Sought</b>	<b>Comments included</b>
Strategic director, finance & governance	No	No
Strategic director, environment and leisure	No	No
Strategic director, housing and modernisation	No	No
Director of regeneration	No	No
Director of law and democracy	No	No
<b>Date final report sent to Constitutional Team</b>		18 February 2016

# APPENDIX 1

## Consultation undertaken

**Site notice date:** 16/10/2015

**Press notice date:** 15/10/2015

**Case officer site visit date:** n/a

**Neighbour consultation letters sent:** 16/10/2015

### Internal services consulted:

Ecology Officer  
Economic Development Team  
Environmental Protection Team Formal Consultation [Noise / Air Quality / Land Contamination / Ventilation]  
Flood and Drainage Team  
HIGHWAY LICENSING  
Highway Development Management  
Housing Regeneration Initiatives  
Public Realm Comments on Developments Where Trees are Affected  
Waste Management

### Statutory and non-statutory organisations consulted:

EDF Energy  
Environment Agency  
Greater London Authority  
Historic England  
London Fire & Emergency Planning Authority  
London Underground Limited  
Metropolitan Police Service (Designing out Crime)  
Natural England - London Region & South East Region  
Network Rail (Planning)  
Thames Water - Development Planning  
Transport for London (referable & non-referable app notifications and pre-apps)

### Neighbour and local groups consulted:

Flat 1 Fraser Court SE1 4HA  
Flat 2 Fraser Court SE1 4HA  
19 Trinity Church Square London SE1 4HU  
20 Trinity Church Square London SE1 4HU  
Flat 5 Fraser Court SE1 4HA  
Flat 6 Fraser Court SE1 4HA  
Flat 3 Fraser Court SE1 4HA  
Flat 4 Fraser Court SE1 4HA  
10e Trinity Church Square London SE1 4HU

10 Trinity Street London SE1 1DB  
21 Swan Street London SE1 1BY  
23 Swan Street London SE1 1BY  
50 Swan Street London SE1 1DF  
27a Swan Street London SE1 1BY  
Rise House 5 Trinity Street SE1 1DB  
4 Light Room Apartments 325 Borough High Street SE1 1JH  
5 Light Room Apartments 325 Borough High Street SE1 1JH  
2 Light Room Apartments 325 Borough High Street SE1 1JH

10f Trinity Church Square London SE1 4HU  
10c Trinity Church Square London SE1 4HU  
10d Trinity Church Square London SE1 4HU  
11 Trinity Church Square London SE1 4HU  
Basement Flat 67 Trinity Church Square SE1 4HT  
11a Trinity Church Square London SE1 4HU  
Henry Wood Hall Trinity Church Square SE1 4HU  
Flat 7 Fraser Court SE1 4HA  
Apartment 1 Rutherford Lodge SE1 4HE  
Apartment 2 Rutherford Lodge SE1 4HE  
3 Brockham Street London SE1 4HB  
5 Brockham Street London SE1 4HB  
4a Trinity Church Square London SE1 4HU  
6a Trinity Church Square London SE1 4HU  
Apartment 3 Rutherford Lodge SE1 4HE  
Ground Floor Flat 67 Trinity Church Square SE1 4HT  
Flat 10 Fraser Court SE1 4HA  
Flat 11 Fraser Court SE1 4HA  
Flat 8 Fraser Court SE1 4HA  
Flat 9 Fraser Court SE1 4HA  
Flat 14 Fraser Court SE1 4HA  
Flat 15 Fraser Court SE1 4HA  
Flat 12 Fraser Court SE1 4HA  
Flat 13 Fraser Court SE1 4HA  
  
10b Trinity Church Square London SE1 4HU  
Flat 8 2 Trinity Church Square SE1 4HU  
Flat 9 2 Trinity Church Square SE1 4HU  
Flat 6 2 Trinity Church Square SE1 4HU  
Flat 7 2 Trinity Church Square SE1 4HU  
Flat 3 22 Trinity Church Square SE1 4HY  
Flat 4 22 Trinity Church Square SE1 4HY  
Flat 1 22 Trinity Church Square SE1 4HY  
Flat 2 22 Trinity Church Square SE1 4HY  
Flat 1 14 Trinity Church Square SE1 4HU  
Flat 2 14 Trinity Church Square SE1 4HU  
Flat 5 5 Trinity Church Square SE1 4HU  
Flat 6 5 Trinity Church Square SE1 4HU  
Flat 5 14 Trinity Church Square SE1 4HU  
Flat 5 2 Trinity Church Square SE1 4HU  
Flat 3 14 Trinity Church Square SE1 4HU  
Flat 4 14 Trinity Church Square SE1 4HU  
Flat 1 2 Trinity Church Square SE1 4HU  
7b Trinity Church Square London SE1 4HU  
7c Trinity Church Square London SE1 4HU  
16c Trinity Church Square London SE1 4HU  
7a Trinity Church Square London SE1 4HU  
1 Trinity Church Square London SE1 4HU  
10a Trinity Church Square London SE1 4HU  
7d Trinity Church Square London SE1 4HU  
9a Trinity Church Square London SE1 4HU  
Flat 4 2 Trinity Church Square SE1 4HU  
12a Trinity Church Square London SE1 4HU  
Flat 2 2 Trinity Church Square SE1 4HU  
Flat 3 2 Trinity Church Square SE1 4HU  
16a Trinity Church Square London SE1 4HU  
16b Trinity Church Square London SE1 4HU  
12b Trinity Church Square London SE1 4HU  
12c Trinity Church Square London SE1 4HU  
First Floor Second Floor And Third Floor 289-299 Borough  
High Street SE1 1JG  
Ground Floor 293-295 Borough High Street SE1 1JG  
Flat 8 St Michaels Court SE1 1HY  
Flat 10 St Michaels Court SE1 1HY  
Crown Court Basement To Second Floors Sessions House  
SE1 6AZ  
Basement And Ground Floor 305-307 Borough High Street  
SE1 1JH  
Flat B 60 Trinity Church Square SE1 4HT  
Second Floor Flat 8 Trinity Street SE1 1DB

3 Light Room Apartments 325 Borough High Street SE1 1JH  
Advocates Lounge Sessions House SE1 6AZ  
Southwark Police Station 323 Borough High Street SE1 1JL  
Public Lounge Sessions House SE1 6AZ  
Jury Lounge Sessions House SE1 6AZ  
27b Swan Street London SE1 1BY  
Flat 1 Gloucester Court SE1 1DQ  
Flat 10 Gloucester Court SE1 1DQ  
8a Trinity Street London SE1 1DB  
Flat 13 Gloucester Court SE1 1DQ  
Flat 14 Gloucester Court SE1 1DQ  
Flat 11 Gloucester Court SE1 1DQ  
Flat 12 Gloucester Court SE1 1DQ  
27e Swan Street London SE1 1BY  
Flat 1 18 Trinity Street SE1 1DB  
27c Swan Street London SE1 1BY  
27d Swan Street London SE1 1BY  
Flat 4 18 Trinity Street SE1 1DB  
12a Trinity Street London SE1 1DB  
Flat 2 18 Trinity Street SE1 1DB  
Flat 3 18 Trinity Street SE1 1DB  
1 Light Room Apartments 325 Borough High Street SE1 1JH  
Basement And Ground Floor 4 Trinity Street SE1 1DB  
Basement And Ground Floor Flat 61 Trinity Church Square SE1  
4HT  
Fifth Floor 291-299 Borough High Street SE1 1JG  
3 Horsemonger Mews London SE1 4GG  
3 Trinity Church Square London SE1 4HU  
Fourth Floor 291-299 Borough High Street SE1 1JG  
Unit 3 Arches 80 And 81 Newington Court SE1 6DF  
Unit 4 Arches 78 And 79 Newington Court SE1 6DF  
Offices 23 Harper Road SE1 6AW  
Unit 1 Arches 84 And 85 Newington Court SE1 6DF  
Second Floor And Third Floor Flat 2 Trinity Street SE1 1DB  
Second Floor Flat 4 Trinity Street SE1 1DB  
Third Floor Borough Medical Centre SE1 6ED  
First Floor Flat 2 Trinity Street SE1 1DB  
First Floor Flat 4 Trinity Street SE1 1DB  
Flat C 307 Borough High Street SE1 1JH  
Flat D 307 Borough High Street SE1 1JH  
Flat A 307 Borough High Street SE1 1JH  
Flat B 307 Borough High Street SE1 1JH  
325a Borough High Street London SE1 1JH  
325b Borough High Street London SE1 1JH  
Flat 1 305 Borough High Street SE1 1JH  
Flat 2 305 Borough High Street SE1 1JH  
Flat 1 29 Swan Street SE1 1DF  
Flat 4 29 Swan Street SE1 1DF  
Flat 2 29 Swan Street SE1 1DF  
Flat 3 29 Swan Street SE1 1DF  
Flat 3 305 Borough High Street SE1 1JH  
Flat 4 305 Borough High Street SE1 1JH  
22 Trinity Street London SE1 4HS  
58 Trinity Church Square London SE1 4HT  
63 Trinity Church Square London SE1 4HT  
64 Trinity Church Square London SE1 4HT  
61 Trinity Church Square London SE1 4HT  
Flat 12 St Michaels Court SE1 1HY  
Avon House 275-287 Borough High Street SE1 1JE  
Flat 9 St Michaels Court SE1 1HY  
  
Flat 11 St Michaels Court SE1 1HY  
301-303 Borough High Street London SE1 1JH  
Britannia House 7 Trinity Street SE1 1DB  
1-3 Trinity Street London SE1 1DB  
  
65 Trinity Church Square London SE1 4HT  
  
Flat B 67 Trinity Church Square SE1 4HT  
Flat C 67 Trinity Church Square SE1 4HT

Flat G 62 Trinity Church Square SE1 4HT  
 Flat A 60 Trinity Church Square SE1 4HT  
 Flat 4 St Michaels Court SE1 1HY  
 Flat 5 St Michaels Court SE1 1HY  
 Third Floor Flat 8 Trinity Street SE1 1DB  
 Flat 2 St Michaels Court SE1 1HY  
 Ground Floor To First Floor Borough Medical Centre SE1 6ED  
 12b Trinity Street London SE1 1DB  
 Crown Court Swan Street SE1 1DF  
 Second Floor Borough Medical Centre SE1 6ED  
 Ground Floor Left 7 Newington Causeway SE1 6ED  
 Ground Floor 14-16 Trinity Street SE1 1DB  
 First Floor And Second Floor 14-16 Trinity Street SE1 1DB  
 Flat F 62 Trinity Church Square SE1 4HT  
 9 Newington Causeway London SE1 6ED  
 21 Harper Road London SE1 6AW  
 7-9 Newington Causeway London SE1 6ED  
 49 Harper Road London SE1 6AP  
 51 Harper Road London SE1 6AP  
 25-29 Harper Road London SE1 6AW  
 Flat 2 19 Harper Road SE1 6AW  
 Flat 3 19 Harper Road SE1 6AW  
 Flat 1 19 Harper Road SE1 6AW  
 Flat 6 19 Harper Road SE1 6AW  
 Flat 7 19 Harper Road SE1 6AW  
 Flat 4 19 Harper Road SE1 6AW  
 Flat 5 19 Harper Road SE1 6AW  
 53 Harper Road London SE1 6AP  
 Flat B 62 Trinity Church Square SE1 4HT  
 Flat B 59 Trinity Church Square SE1 4HT  
 Flat A 62 Trinity Church Square SE1 4HT  
 Flat A 59 Trinity Church Square SE1 4HT  
 Flat D 62 Trinity Church Square SE1 4HT  
 Flat E 62 Trinity Church Square SE1 4HT  
 Flat C 62 Trinity Church Square SE1 4HT  
 Flat C 59 Trinity Church Square SE1 4HT  
 59 Harper Road London SE1 6AP  
 55 Harper Road London SE1 6AP  
 57 Harper Road London SE1 6AP  
 Flat 2 6 Trinity Street SE1 1DB  
 Flat 3 6 Trinity Street SE1 1DB  
 9 Trinity Church Square London SE1 4HY  
 Flat 1 6 Trinity Street SE1 1DB  
 25 Swan Street London SE1 1BY  
 6 Trinity Church Square London SE1 4HU  
 Flat A 67 Trinity Church Square SE1 4HT  
 Flat 3 5 Trinity Church Square SE1 4HU  
 Flat 4 5 Trinity Church Square SE1 4HU  
 Flat 1 5 Trinity Church Square SE1 4HU  
 Flat 2 5 Trinity Church Square SE1 4HU  
 13 Trinity Church Square London SE1 4HU  
 16 Trinity Church Square London SE1 4HU  
 66 Trinity Church Square London SE1 4HT  
 12 Trinity Church Square London SE1 4HU  
 4 Trinity Church Square London SE1 4HU  
 18 Trinity Church Square London SE1 4HU  
 21 Trinity Church Square London SE1 4HU  
 Flat 7 St Michaels Court SE1 1HY  
 Flat 6 Gloucester Court SE1 1DQ  
 Flat 7 Gloucester Court SE1 1DQ  
 Flat 4 Gloucester Court SE1 1DQ  
 Flat 5 Gloucester Court SE1 1DQ  
 297 Borough High Street London SE1 1JG  
 Flat 8 Gloucester Court SE1 1DQ  
 Flat 9 Gloucester Court SE1 1DQ  
 Flat 17 Gloucester Court SE1 1DQ  
 Flat 18 Gloucester Court SE1 1DQ  
 Flat 15 Gloucester Court SE1 1DQ  
 Flat 16 Gloucester Court SE1 1DQ  
 Flat 20 Gloucester Court SE1 1DQ  
 Flat 3 Gloucester Court SE1 1DQ  
 Flat 19 Gloucester Court SE1 1DQ  
 Flat 2 Gloucester Court SE1 1DQ  
 307 Borough High Street London SE1 1JH  
 1 Hulme Place London SE1 1HX  
 2 Hulme Place London SE1 1HX  
 Flat 3 St Michaels Court SE1 1HY  
 Flat 6 St Michaels Court SE1 1HY  
 Flat 1 St Michaels Court SE1 1HY  
 33 Swan Street London SE1 1DF  
 299 Borough High Street London SE1 1JG  
 12 Trinity Street London SE1 1DB  
 6 Trinity Street London SE1 1DB  
 8 Trinity Street London SE1 1DB  
 20 Trinity Street London SE1 1DB  
 2 Trinity Street London SE1 1DB  
 100 Pall Mall London SW1Y 5NQ  
 12a Trinity Street Borough SE1 1DB  
 42 Trinity Church Square SE1 4HY

**Re-consultation:** n/a

## APPENDIX 2

### Consultation responses received

#### Internal services

Environmental Protection Team Formal Consultation [Noise / Air Quality / Land Contamination / Ventilation]  
Flood and Drainage Team

#### Statutory and non-statutory organisations

Environment Agency  
Historic England  
London Fire & Emergency Planning Authority  
London Underground Limited  
Metropolitan Police Service (Designing out Crime)  
Natural England - London Region & South East Region  
Transport for London (referable & non-referable app notifications and pre-apps)

#### Neighbours and local groups

Flat E 62 Trinity Church Square SE1 4HT  
Flat 3 29 Swan Street SE1 1DF  
Flat 3 29 Swan Street SE1 1DF  
Flat 8 Gloucester Court SE1 1DQ  
12a Trinity Street Borough SE1 1DB  
12b Trinity Street London SE1 1DB  
42 Trinity Church Square SE1 4HY