

Item No. 5.2	Classification: Open	Date: 6 October 2015	Meeting Name: Planning Committee
Report title:	Development Management planning application: Application 14/AP/4773 for: Full Planning Permission Address: 55 SOUTHWARK STREET, LONDON, SE1 1TE Proposal: Demolition of existing building at No. 55 Southwark Street and redevelopment of site to erect a 7 storey building and a 30 storey tower (plus basement and roof gardens) to a maximum height of 105.110m AOD to accommodate the following uses: public theatre and rehearsal space (Sui Generis use), art space and museum (Class D1/D2 use), restaurant and cafe (Class A3 use), bar (Class A4 use), offices (Class B1 use) and 9 residential flats.		
Ward(s) or groups affected:	Cathedrals		
From:	Director of Planning		
Application Start Date 13/07/2015		Application Expiry Date 12/10/2015	
Earliest Decision Date 19/08/2015			

RECOMMENDATION

1. To refuse planning permission, subject to referral to the Mayor for London.

BACKGROUND INFORMATION

Site location and description

2. The site consists of a surface car park and a 5 storey (plus basement) building fronting onto Southwark Street. With a site area of 1,572sqm (0.157 hectares), it is located on the southern side of Southwark Street and is sandwiched between the road and the railway viaduct. Directly adjacent to the site to the east (and in the same ownership) is the Grade II listed Menier Theatre building at Nos. 51 and 53 Southwark Street and this is 5 storeys in height. The entire site lies within the Thrale Street Conservation Area.
3. The existing commercial building (No. 55) has a curved form dating from the 1930s. The applicant has advised that the building is used as a temporary art studio, which would fall within the D1 class use, though the Council has no planning records to authorise this.
4. To the west of No. 55 and outside of the site boundary is City Bridge House (No. 57 Southwark Street), a later 20th century office building that is 6 storeys in height, but with planning permission, granted in 2013, for an additional 2 storeys at roof level.
5. To the south of the site are the arches of the railway viaduct, some of which are currently undergoing conversion to offices, retail, restaurant and night club use. There is an existing access to the site through these arches from Union Street.

6. To the north of the site (Nos. 48 to 58 Southwark Street) are office and commercial buildings that are between 5 - 6 storeys tall.
7. The site is within the following Core Strategy designations:

Central Activity Zone (CAZ); Bankside and Borough District Town Centre; Bankside, Borough and London Bridge Opportunity Area; Bankside, Borough, London Bridge Strategic Cultural Area; Archaeological Priority Zone (APZ); and the Air Quality Management Area (AQMA).
8. It is also within the Flood Risk Zone 3 and has a Public Transport Accessibility Level (PTAL) rating of 6b, which indicates excellent access to public transport.

Details of proposal

9. It is proposed to demolish the existing building at No. 55 and redevelop the site for a part 7 storey building and a 30 storey tower (plus 2 basements and roof gardens) to accommodate the following uses:

Public theatre and rehearsal space (Sui Generis use) circa 2,585sqm;
Restaurant and Cafe (A3 class use) circa 961sqm;
Bar, drinking establishment (A4 class use) circa 240sqm;
Office (B1 class use) circa 3,328sqm;
Museum, exhibition space and spiritual centre (D1/D2 class use) circa 687sqm and;
9 No. three bedroom residential flats (C3 class use)

10. The proposed building on the site is essentially split into two elements and these are described as the 'north' and 'south' parts in this report.
11. The building would cover most of the site area (within the red line boundary) at ground floor level. The building then essentially splits into two elements at the first floor level to provide a raised central courtyard. The building is 7 storeys (23.85m tall) fronting Southwark Street (north elevation). The south part of the site (the rear) would comprise the 30 storey tower rising from a 7 storey base used primarily for offices and the maximum height of the building would be 105.110m above ordnance datum (AOD).
12. The public uses (theatre, museum, offices and cafe/bar) are to be accessed from Southwark Street and the residential and staff entrances and service vehicle routes are accessed from the rear, off Union Street. In summary the uses are allocated as follows:

Basement and basement mezzanine (2 levels of basement): Theatre auditorium and associated dressing rooms, toilets, kitchen and plant and storage.

The ground floor contains the following uses: The main entrance into the building for the public for the restaurant and bar and theatre reception area. Other associated uses such as toilets, kitchen, and theatre administration is located to the rear.

1st floor: This level provides the public terrace at the centre of the site. The rear building to the south would accommodate a cafe and tea museum and the front building would house the exhibition space.

2nd floor: The front building accommodates rehearsal studio and the rear building comprises B1 class commercial space.

3rd floor: B1 office floor space is proposed within the rear building and a rehearsal

balcony is proposed at the front.

4th and 5th floors: More rehearsal space is proposed at the front and B1 office area is proposed at the rear.

6th floor: This level provides B1 office floorspace in the front and rear buildings.

7th floor: The common area for the residents is located on the seventh floor with access to a green roof, both located within the rear building.

8th floor: This floor is reserved for plant only.

Floors 9 - 26: 9 residential duplex flats at 268sqm each.

27 and 28th floors: The 'spiritual centre' (D1 class) would occupy these two floors.

Finally, on the 29th floor: 15sqm of plant space is located on this top floor.

13. The front building at 7 storeys tall is arranged as a masonry wall with punched openings up to a cornice at the 4th floor and then a sloping facade above that. This sloping facade is constructed of steel and glass.
14. The rear part of the site to the south is also 7 storeys tall with the tower at 30 storeys (in total) rising above that. This tower is conceived as a 'rocket' with a circular plan form, long slim body with metal triangulated exoskeleton and topped with a cone shaped nose.
15. No associated parking spaces are proposed on the site. Cycle parking has been shown within a narrow alley between the proposed building and No. 57 Southwark Street.

Planning history

16. Planning permission granted under ref 95-AP-0446 (June 1995) for: Change of use and conversion of second and third floors to one residential flat.
17. It is not clear whether this permission was ever implemented. The applicant has advised that this space is currently used as temporary art studios.

Planning history of adjoining sites

18. There is substantial planning history on the adjoining sites, but the most recent and relevant are as follows:

City Bridge House at 57 Southwark Street

13-AP-0368 - Planning permission was granted with unilateral undertaking for:

Erection of two additional storeys (plus lift over-run) set back at sixth and seventh floor levels to provide additional office (Class B1) floorspace. Re-cladding of the north, east and west facades and replacement windows on south facade. Extension of north facade forward by one metre from ground to fifth floor level. Ground floor extension with canopy to enlarge the reception area, provision of external and internal cycle parking storage. Part enclosure of rear yard at ground floor level and provision of garden lightwell to basement on southern edge of site. (dated 16.07.2013).

Bridge Court at 73-81 Southwark Bridge Road

11-AP-1631 - Planning permission was granted for:

Change of use of first floor from art gallery (D1 use) to part office and part training (B1 /D1 uses), change of use of third floor from office (B1 use) to part office and part training (B1 / D1 uses) and change of use of fourth and fifth floors from art gallery/ artist workshop (D1 use) to gymnasium (D2 use) (dated 10.08.2011).

06-AP-1903 - Planning permission was granted for:

Change of use from offices, exhibition space and workshop to 3rd and 4th floors art gallery and 5th floor to meeting room and artists workshop (dated 27.11.2006)

06-AP-1131 - Planning permission was granted for:

Conversion of second floor to an art gallery and exhibition space (dated 08.08.2006).

KEY ISSUES FOR CONSIDERATION

Summary of main issues

19. The main issues to be considered in respect of this application are:
- a) The principle of the development in terms of land use and conformity with strategic policies.
 - b) Environmental Impact Assessment
 - c) Height and design including appropriateness of the site for a tall building
 - d) Impact on character and setting of Listed Buildings and Conservation Areas
 - e) Internal layout and quality of accommodation
 - f) Affordable housing
 - g) Impact on adjoining occupiers
 - h) Transport issues
 - i) Planning obligations
 - j) Sustainability
 - k) Archaeology
 - l) Flood risk

Planning policy

20. National Planning Policy Framework (the Framework)
Section 1: Building a strong, competitive economy
Section 2: Ensuring the vitality of town centres
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
21. Further Alterations to the London Plan (FALP) 2015
2.10 Central Activities Zone - Strategic Priorities
2.13 Opportunity Areas and Intensification Areas
2.15 Town centres
3.3 Increasing housing supply
3.4 Optimising housing potential
3.5 Quality and design of housing developments
3.6 Children and young people's play and informal recreation facilities
3.8 Housing choice

- 3.9 Mixed and balanced communities
- 3.11 Affordable housing targets
- 3.12 Negotiating affordable housing on individual and private residential and mixed use schemes
- 3.13 Affordable housing thresholds
- 4.2 Offices
- 4.3 Mixed use development and offices
- 4.6 Support for and enhancement of arts, culture, sport and entertainment
- 4.7 retail and town centre development
- 5.2 Minimising carbon dioxide emissions
- 5.12 Flood risk management
- 6.3 Assessing effects of development on transport capacity
- 6.5 Funding Crossrail and other strategically important transport infrastructure
- 6.9 Cycling
- 6.13 Parking
- 7.2 An inclusive environment
- 7.3 Designing out crime
- 7.4 Local character
- 7.5 Public realm
- 7.6 Architecture
- 7.7 Location and design of tall and large buildings
- 7.8 Heritage assets and archaeology
- 7.11 London view management framework
- 7.12 Implementing the London view management framework
- 8.2 Planning obligations
- 8.3 Community Infrastructure levy

22. Core Strategy 2011

Strategic Policies:

- 1 - Sustainable Development
- 2 - Sustainable transport
- 3 - Shopping, leisure and entertainment
- 4 - Places for learning, enjoyment and healthy lifestyles
- 5 - Providing new homes
- 6 - Homes for people on different incomes
- 7 - Family homes
- 10 - Jobs and businesses
- 12 - Design and conservation
- 13 - High environmental standards
- 14 - Implementation and delivery

Southwark Plan 2007 (July) - saved policies

23. The council's cabinet on 19 March 2013, as required by para 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.

- 1.1 Access to Employment Opportunities
- 1.4 Employment Sites Outside The Preferred Office Locations And Preferred Industrial Locations
- 1.7 Development within Town and Local Centres

- 1.11 Arts, Culture and Tourism Uses
- 2.1 Enhancement of Community Facilities
- 2.2 Provision of new Community Facilities
- 2.5 Planning Obligations
- 3.1 Environmental Effects
- 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
- 3.16 Conservation Areas
- 3.18 Setting of Listed buildings, Conservation Areas and world heritage sites
- 3.19 Archaeology Priority Zone
- 3.20 Tall Buildings
- 4.2 Quality of Residential Accommodation
- 4.3 Mix of dwellings
- 4.4 Affordable housing
- 5.1 Locating Developments
- 5.2 Transport impacts
- 5.3 Walking and cycling
- 5.4 Public Transport Improvements
- 5.6 Car parking

Supplementary Planning Documents (SPD and SPG)

Bankside Borough and London Bridge SPD (Draft)

- 24. A draft SPD was produced by the council and consultation was carried out in 2010. However, progression was held in abeyance pending discussions on a neighbourhood plan. The draft SPD should be accorded very little weight in the determination of planning applications.
- 25. Affordable Housing SPD (adopted 2008 and draft 2011)
Section 106 planning obligations and community infrastructure levy (CIL) SPD 2015
Residential design standards SPD 2011

Principle of development

- 26. The existing site includes a surface car park, and a 5 storey building. There is no record of a permanent permission for the car park, although it is known to have been in existence for many years. The car park boundary to Southwark Street contains a number of large format advertising hoardings. The land does not contribute positively to the streetscape of Southwark Street, and in attracting cars into the area has an adverse impact on the wider environment through congestion, noise and pollution. The redevelopment of this car park would, with a high quality and appropriate development, have positive benefits for the local area, and this issue should be given weight in any decision.
- 27. D Class use
The existing building (55 Southwark Street) is not listed, but its design (dating from the 1930s) has an appropriate relationship with the Thrale Street conservation area.
- 28. The building was originally built for office use, but it is clear that over time this building

has become vacant on occasions and other uses have been introduced. The planning history indicates that part of the building had planning permission to change the use of the building to one residential flat on the second and third floors (ref 95-AP-0446). It is not clear whether this permission was ever implemented and the existing floor plans submitted indicates that there is no existing residential use within the building. There are no other planning records on this site. Whilst the lawful use may be B1 class offices, the applicant claims that the existing use in the building is a temporary art studio (of approximately 443sqm) which would be a class D1 use under the Use Classes Order 1987 (as amended). Saved Policy 2.1 of the Southwark Plan 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 LPA that the community facility is surplus to requirements of the local community and that the replacement development meets an identified need; or

ii. The applicant demonstrates that another locally accessible facility with similar or enhanced provision can meet the identified needs of the local community facility users."

29. The application would demolish the existing building, but the proposal would reprovide for 687sqm of D1 use floorspace in the form of a museum, exhibition space and 'spiritual centre', which exceeds the current 443sqm. The museum and exhibition space and the spiritual centre could be used by all members of the community. This use is appropriate in the town centre and strategic cultural area and the increase in D1 floorspace is welcomed.

30. Offices

The introduction of B1 offices on this site is welcomed as it is located within the CAZ. Saved Policy 1.4 of the Southwark Plan seeks to retain existing and encourage new Class B Uses within certain areas, including the CAZ. There is excellent public transport accessibility and is also within a mixed use building. The quantum of office floorspace proposed (approximately 3,328sqm) would therefore be acceptable. This would more than re-provide the space currently within 55 Southwark Street if the Council were to assume its probable lawful use as offices.

31. Cultural uses

The proposal includes a theatre and rehearsal space and a small museum. The theatre sits adjacent to the Menier Chocolate Factory theatre, which is owned by the applicant. The new theatre would complement and expand the arts and cultural offer in Bankside and the South Bank, and the rehearsal space could support the existing theatres if they lack dedicated rehearsal space. The small museum would also be an appropriate addition to the wider tourist and cultural offer, although its location within the site does not make it immediately obvious to customers and visitors. The application also provides a small space at the upper level of the tower described as a 'spiritual centre'. The applicant has suggested that this would be available to the public although it shares its access with the flats and it is not clear under what terms it could be used. The cultural uses would be appropriate on this site, which sits within the CAZ, the Bankside, Borough and London Bridge Opportunity Area, the Strategic Cultural Area, and the Borough and Bankside town centre. The provision of new cultural uses are a positive aspect of the proposal. However, as this report goes on to consider, these benefits are substantially outweighed by the harm caused to the townscape and heritage assets by the overall development.

32. Residential flats

The tower contains 9 large private residential flats, accessed from Union Street. The inclusion of residential within a mixed use development on this site would be

acceptable, but the scheme makes no contribution to affordable housing, and this issue is discussed further at paragraphs 48-54. The application suggests that the residential flats would act as an 'enabling development' supporting the provision of the new theatre and allowing it to be developed without public subsidy. However, no evidence has been provided to support this assertion, and therefore this issue could be given very little weight in determining the application.

33. Conclusion in relation to principle of development

The National Planning Policy Framework (NPPF) 2012 sets out a presumption in favour of sustainable development, including a focus on supporting economic development and delivering homes. It encourages the effective use of land by reusing land that has been previously developed. The NPPF states that planning permission should be granted for proposals unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits. The principle of developing this neglected site for the range of uses being proposed is therefore supported, as each would contribute to the character, vitality and economic well-being of Bankside. The site is very well located for public transport as it has a PTAL rating of 6b (classed as Excellent). The applicant has stressed the benefits of the new theatre for the further regeneration of Southwark Street and the identity of the local area.

34. In recommending that planning permission be refused, officers have had regard to the NPPF as a whole, its emphasis on the importance of high quality and appropriate design, and the protection of heritage assets, and conclude that the very clear harm to the local environment is of such significance that it must outweigh the benefits of bringing an under-used site back into productive use. The application fails to comply with a large number of policies at both local and regional (London Plan) level, in relation to height, design, heritage, servicing, highways, affordable housing and energy. This very prominent site is capable of making a positive contribution to the townscape in Southwark Street, and potentially introducing permeability through from Southwark Street to Union Street, and to the east-west Low Line route. The current proposal is a totally inappropriate form of development and does not maximise the opportunities to make those positive contributions.

35. It should be noted that a pre-application submission was made in 2010/2011 for a scheme of a similar scale, height and design and officers gave clear advice that this form of development would not be acceptable. Since that pre-application advice, the applicant has not engaged in any discussions with the Local Planning Authority and this application has not addressed the concerns raised. This is explained further under the consultations section of this report.

Environmental impact assessment

36. No screening or scoping opinion was sought from the council prior to the submission of this application, and no Environmental Statement was submitted with the application.

37. However, an Environmental Statement would not be required with this application as the development does not fall within Schedule 1 or 2 of the Town and Country Planning (Environmental Impact Assessment) Regulations 1999.

38. The site does not exceed 5 hectares and therefore is not classified as a Schedule 2 'urban development project'. The development is unlikely to have a significant effect upon the environment by virtue of its nature, size or location based upon a review of the Schedule 3 selection criteria for screening Schedule 2 Development. The site is located outside a sensitive area as per Regulation 2(1) and the development is unlikely to generate any significant environmental effects of more than local significance. The threshold for considering 'impacts' under the EIA Regulations

means that most large scale developments, even where they have substantial impacts on conservation areas or wider views, will not be required to submit an Environmental Statement.

Design issues

39. Background

The site sits within the background assessment area of London View Management Framework (LVMF) Protected View 1A.2. It is also within the Thrale Street Conservation Area, and close to the boundaries of the Union Street conservation area to the south and the Borough High Street conservation area to the east. There are listed buildings in the vicinity of the site and within the immediate setting of the development would be the Grade II listed Nos. 51-55 Southwark Street, (the Menier Chocolate factory theatre). To the south and behind the railway arches is Nos. 62-64 Union Street which is also Grade II listed.

40. The existing building on the site is an attractive, curved commercial building dating from mid twentieth century (1930's). Despite not being in the best state of repair, it is an attractive building that contributes well to the character and appearance of the conservation area. Its scale, curved geometry and use of brick and stone all successfully echo the listed Menier Building on the other side of the car park.

41. This site is identified as having development potential in the adopted Thrale Street Conservation Area Appraisal. Paragraph 4.8.1 in particular states :

“An opportunity exists for redevelopment of the gap sites adjacent to Nos. 49 Southwark Street and between Nos. 53 and 55 Southwark Street. The introduction a building of four storeys on Southwark Street and no more than seven storeys against the railway on the southern edge of the conservation area. A key consideration is the relationship of the new development to its listed neighbours, both on Southwark Street and on Flat Iron Square (Union Street Conservation Area). Furthermore, historic maps illustrate a Georgian square in this location, before the railway line cut off the south west corner. No. 53 and the former building at No. 55 Southwark Street once bounded each side of Southwark Square and this historic arrangement should be preserved.”

42. This is considered to provide clear guidance for appropriate development on this site. The current proposal appears to have paid no regard to this guidance, either in terms of height, or to the opportunity to reflect the historic arrangement of the site. Indeed, as set out below, they are completely insensitive and cause substantial harm to the local area, including the conservation areas and surrounding listed buildings. This issue was reflected in many of the consultation responses, including those from Conservation Areas Advisory Group and Historic England.

43. Scale, height and tall buildings

In terms of scale and massing on the site, the development represents a clear overdevelopment of the site, with buildings which would appear overbearing in their relationship to the streetscene, and incongruous in their design and detailing.

44. London Plan policy 7.7 states that tall buildings may be appropriate in the CAZ and Opportunity Areas, but goes on to say that they would need particular consideration in sensitive areas such as conservation areas. It also notes that tall buildings should relate well to the form, scale and character of surrounding buildings and the urban grain, and consider impacts on local and strategic views.

45. Strategic Policy 12 of the Southwark Core Strategy identifies suitable locations for tall buildings at the northern end of Blackfriars Road, London Bridge, Elephant and Castle and the action area cores (Canada Water, Aylesbury and Peckham). The site under

consideration here is not identified as being appropriate for a tall building (it is outside the area defined as 'London Bridge'. The core strategy states that *"in other areas tall buildings are not appropriate because they are not very built up... and are covered by conservation areas or have other heritage implications"*.

46. Saved Policy 3.20 of the Southwark Plan states that any building over 30 metres tall is considered a 'tall building'. At just over 105m tall, the proposed tower would fall under this definition. In order for it to be considered acceptable, it would be expected to comply with all of the tests set out in the policy:
 - i. It should make a positive contribution to the landscape; and
 - ii. It should be located at a point of landmark significance; and
 - iii. It should be of the highest architectural standard; and
 - iv. It should relate well to its surroundings, particularly at street level; and
 - v. It should contribute positively to the London skyline as a whole consolidating a cluster within that skyline or providing key focus within views.
47. The proposals under consideration do not comply with any of the tests set out in Saved Policy 3.20. As such, the site is not an acceptable location for a tall building, and the design proposed is not of the quality that would be expected. The following paragraphs assess the proposals against each of these requirements.
48. *i. It should make a positive contribution to the landscape*

A new public amenity space is proposed on a first floor terrace set back from the street between the north and south blocks. This would provide only 332 sqm publicly accessible space and would be accessed via an external stair leading up from Southwark Street, located between the new building and the curved corner of the Menier Theatre Building. This is not considered to make a positive contribution to the landscape of the borough. It would not be visible from the public realm, would be difficult to gain access to, particularly for the disabled or those with young children (although the public lift to the exhibition space is noted) and would not be welcoming or inviting. The design of the space itself is entirely hard landscaped, save for a minimal number of small planters. It would be a narrow and overly enclosed space that would receive very little sunlight and, as suggested by the visualisations submitted, it is unlikely to offer any meaningful amenity value to the wider community. As such, it is far from the positive and generous contribution to landscape that would be considered sufficient to justify a tall building.
49. The other contribution proposed to the local landscape is a new link through the arches, connecting the development site to Flat Iron Square in the Union Street Conservation Area. However, this is already a through-route and is outside the application red line boundary, which means it is outside the remit of the applicant to deliver it. The conversion of the railway arches (Arch No. 33) is already under way. The route would not continue into or through the application site, but would only provide access to the proposed flats, and to a rear entrance to the offices. It is also noted that the layout of this new link, which carries most of the servicing for the development, does not appear to offer any opportunities to support the Low Line ambitions which are being promoted in the draft New Southwark Plan.
50. *ii. It should be located at a point of landmark significance*

Primarily, the sites considered appropriate for tall buildings are set out in the Core Strategy. This site is not one of them. It does not have the city wide status, urban prominence, recognisable destination, or location at a transport hub to support a claim of landmark status. In short, there is no justification in way finding or navigation terms for a tall landmark structure on this site.
51. The applicant claims that the proposals would meet this requirement by virtue of the

nature of the uses proposed within the new building (i.e. public art and theatre facilities). It is also claimed that these uses would attract visitors south from Bankside and enliven Southwark Street, particularly at weekends. Whilst the proposal for theatre and arts uses would be welcomed, this in itself is not sufficient to create a landmark site that needs to be marked by a tall building. The theatre auditorium proposed would be located at basement level and would be 567sqm and the total usable theatre floor area would be 1,576sqm. . A cursory comparison with truly landmark theatres such as the National Theatre, which has three auditoria, or the Coliseum (home to English National Opera and London's largest theatre) which has a seating capacity of 2,359, suggests that the scale proposed is not of this order. That is not to say that a theatre of this size would be appropriate on this site, but rather that the proposal is not actually of a scale that would be considered a landmark destination.

52. Furthermore, as identified in the submitted material, the neighbouring Menier Theatre is successful, but does not rely on the 'beacon' effect of a tall landmark building in order to achieve this. The argument set out is therefore not considered sufficient to justify a tall building in this location.
53. *iii. It should be of the highest architectural standard*
The proposal has been referred to as 'the Rocket' as the design of the tower has been inspired by the engineering behind Gagarin's first space flight in 1961. The resultant form is unmistakably rocket-like, even featuring a cone shaped nose at the top and a supporting tower structure. The rocket reference is completely alien to the character and identity of Southwark, and indeed London as a whole. This crude and literal depiction, described by CAAG as 'comic', has no basis in its locale. As discussed in further detail below, all design is expected to respond sensitively to its context and to integrate into the place in which it is found and this scheme does not achieve this. Furthermore, it appears that this overriding design concept has been pursued at the expense of any architectural quality, and as such it results in compromises such as uncomfortable circular apartment layouts, inappropriate use of materials and a willfully insensitive insertion on the skyline. Although strong architectural concepts are encouraged, this requires sensitivity and skilled manipulation to result in the high architectural standards expected. This has not been employed here, where the inappropriate design concept has been allowed to dominate the proposals to a harmful degree.
54. *iv. It should relate well to its surroundings, particularly at street level*
The proposals for the street level experience of this building are just as harmful to the conservation area and surrounding listed buildings as the 'rocket' tower element.
55. The applicant claims that the proposals would relate well to their surroundings by virtue of the tower being set back from Southwark Street so as not to interrupt the pattern of buildings along Southwark Street. It is also claimed that in Thrale Street and views of it from next to Menier Building would be limited. Whilst the limited visibility claimed is queried, it is also important to note that not being visible is not the same as relating well to the surroundings. The base building would be entirely visible and, as described, is considered harmful. The contribution to the surroundings of this building is therefore considered entirely inappropriate, not only as a justification for a tall building, but also as the general contribution to townscape, as required under Saved Policy 3.13 (discussed below).
56. The north block fronting onto Southwark Street is inappropriately tall and bulky. This is discussed in greater detail below, under Saved Policy 3.13. The texture masonry base of the equivalent three-to-four storeys in height is gargantuan in scale when compared to the proportions of neighbouring buildings and offers very little human scale to the development. The neighbouring listed Menier Building by contrast, has a subtly expressed single storey base of slightly grander proportions than the upper

floors. This is rightly recognised as a finely proportioned building that contributes well to the street scene and character of the wider area. This overwhelming and inappropriate scale along Southwark Street is heightened by the over scaled windows and main entrance that have no relationship to the finely proportioned openings of the surrounding buildings, but serve only to make a grandiose statement about the sheer scale of the scheme. As a result, the Southwark Street elevation remains defensive and unwelcoming and it does not respond appropriately to the character of the surrounding townscape.

57. *v. It should contribute positively to the London skyline as a whole consolidating a cluster within that skyline or providing key focus within views*

The views submitted in support of the application (discussed in further detail below), show that the proposed tower would not comply with this requirement of Saved Policy 3.20. The tower would form a visually dominant, stand alone object of a scale and form that are inappropriate for this sensitive heritage setting.

58. The proposed tower would neither consolidate an existing (or emerging cluster) nor provide a justifiable key focus within views. It would undoubtedly visually dominate views, but there is a clear difference between the harmful impact that this would have with the justifiable need for a focal point in other locations. It would be an incongruous addition to the skyline, not only in terms of its height, but also in terms of form, materiality and appearance. This would not only cause unacceptable harm to the character of the local area, but also to the skyline of London as a whole (see assessment of LVMF Strategic View 1A.2 below).

59. *Strategic views*

As explained above, the application site falls within the background assessment area of LVMF protected View 1A.2, so the guidance found within the LVMF and Saved Policy 3.21 both apply. Saved Policy 3.21 states that *“The LPA will seek to protect and enhance the strategic views of St. Paul’s Cathedral illustrated on the Proposals Map.”*

60. It is noted that the application material does not contain any verified views or *Accurate Visual Representations* taken from the viewing point in question. It is therefore not possible to fully assess the impact that the proposals would have.

61. The submitted material claims that the proposed tower would be directly behind the dome of St Pauls Cathedral when viewed from this point (and makes the suggestion that this should be controlled by condition). The lack of verified views means that this claim cannot be supported. Furthermore, it would be unacceptable to control such a fundamental principle of this development by condition. The position of the site directly behind St Pauls in this view means that it is in one of the most sensitive locations in the background consultation area. Even a relatively small protrusion beyond the dome would cause substantial harm to the protected silhouette of arguably London’s most important landmark.

62. Notwithstanding all of the above, the LVMF and London Plan Policy 7.12 are explicit that *“where there is a Protected Vista: a development that exceeds the threshold height of a Landmark Viewing Corridor should be refused”*. The threshold height established for protected vista 1A.2 is 52.1m AOD in the Background Wider Setting Consultation Area. At over 105m, the tower proposed would far exceed this.

63. Historic England has commented that the small scale sketches and associated table provided within the Design and Access Statement are insufficient to assess the potential impact of a tall building and associated development on the immediate and wider historic environment. Given the significance of the heritage assets identified above, the potential impact of a tall building in this area and the absence of any convincing justification or analysis, including visually verified images, Historic England

concludes that the harm would be substantial.

64. It is also worth noting that, although it is possible that the proposed tower would be obscured from the specific viewing point identified, it is assumed that it would have a significant impact on the skyline from other adjacent locations. Given the incongruous form proposed, this impact would inevitably be of substantial harm, reiterating as set out above that the proposals would fail to comply with Part (v) of Saved Policy 3.20.
65. Urban Design
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.”*
66. Strategic Policy 12 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.”*
67. Saved Policy 3.13 asserts that the principles of good urban design must be taken into account in all developments. This includes height, scale and massing of buildings, consideration of the local context, its character and townscape as well as the local views and resultant streetscape.
68. In terms of the proposed height, scale and massing the major concern is of course the objection to a tall building in this location. However, there are also significant concerns about the street level massing of the scheme. Fronting onto Southwark Street, a 7 storey (23.85m) block is proposed with the intention of contributing to the established street scene. However, this is considered too tall and bulky to achieve this successfully. This far exceeds the design guidance set out for this site in the Thrale Street Conservation Area Appraisal, which clearly states that *“a building of four storeys on Southwark Street and no more than seven storeys against the railway on the southern edge of the conservation area”* would be acceptable in principle. At 23.85m tall, even with a generous floor to floor height of 3m the proposed street block would be the equivalent of almost 8 storeys. This is completely unacceptable and would result in substantial harm to the townscape character of the area.
69. The street façade would be broken down into a 3-4 storey (or the equivalent thereof) ‘textured base’ with a glass and steel ‘mansard’ structure above. The scale of the ‘base’ is gargantuan and would compromise the attractive and well mannered human scale of the existing townscape.
70. The top of the base would be defined by a cornice feature, above which would be a sloping façade that is intended to be reminiscent of a traditional mansard roof. However, it could not reasonably be described as a mansard roof since it takes up effectively half of the height of the street facing block and extends over 4 storeys. It is designed with a striking triangular motif that would visually dominate the street scene in a manner that is completely at odds with the recessive, set back nature of traditional mansards. It would also dominate and attract attention away from the finely detailed neighbouring listed building.
71. Saved Policy 3.16 ‘Conservation Areas’ of The Southwark Plan also requires proposals to deliver appropriate site layouts that respond to the existing urban structure, allow for connectivity and movement where desirable and result in active frontages.
72. Whilst the principle of having a restaurant and the theatre box office/lobby fronting onto the street is sound, the detailed design of the interface between inside and

outside is inappropriate. The hugely over scaled windows with deep fluted reveals proposed along this street elevation would be harmfully incongruous in the street scene; despite the size of these openings, the street elevation would remain defensive and unwelcoming and it is not considered that this would create the sort of active and well animated street frontage that is expected.

73. Whilst the illustrative material is indicative, it would also appear that this frontage would rely heavily on the presence of excessively large advertisements to provide animation and visual interest. The size and visual prominence of the advertisements shown in the application material (including the proliferation of advertisements shown on other facades) would be unacceptable.
74. The applicant claims that the new connection with Flat Iron Square via the railway arch 33 will enhance the use of the Flat Iron Square space by increasing footfall encouraging greater use of its amenities. However, the red line boundary does not include the areas to the rear of the site used for access and servicing, and there is no blue line to indicate that the applicant has any land ownership interest in that land.
75. The area between the building and the railway arches is designated in the draft New Southwark Plan as part of a pedestrian route (the 'Low-Line') between London Bridge and Waterloo along the line of the viaduct. The development concentrates its servicing at the rear of the building, thus turning its back on the proposed 'Low-Line' scheme for a pedestrian route. Although the Low-Line proposal could be given limited weight due to its early stage of progression, it is reasonable to expect applications to support the broad aspiration, for instance by creating active frontages along its route.
76. In terms of the building fabric, the palette of materials proposed (stone, brick, steel and glass) is not necessarily inappropriate or harmful in this context. However, the articulation proposed and the ways in which these materials would be applied is considered insensitive and unresponsive. This is discussed further below in terms of the impact on the heritage assets.
77. Impact on the character and setting of listed buildings and conservation areas
Saved Policy 3.15 requires development to preserve or enhance the special interest or historic character or appearance of buildings or areas of historical or architectural significance. It goes on to state that planning proposals that have an adverse effect on the historic environment will not be permitted and that the character and appearance of conservation areas should be recognised and respected in any new development within these areas.
78. Saved Policy 3.16 states that, within conservation areas, development should preserve or enhance the character or appearance of the area.
79. Historic England has highlighted that without representational material of an appropriate scope, quality, clarity and detail, it is not possible to assess the architectural quality of a tall building on the immediate and wider context.
80. As set out above, the proposals do not follow the guidance set out in the conservation area appraisal and make no attempt to justify why this advice has not been followed.
81. The Conservation Area Appraisal also identifies Lambert House at No. 55 Southwark Street (the existing building on the site) as an unaltered example of a 1930's commercial building. Although it is not formally identified as a key unlisted building it is of value to the conservation area, particularly in terms of the way its curved façade mirrors that of the Menier Building and its position marking the former extent of the Georgian Square. The 'Key Unlisted Buildings' are identified in the appraisal as being of "*particular note*", but it is not considered that this list is exhaustive of all those that

contribute positively. As the appraisal statement makes clear, the *“replacement of unlisted structures will normally only be entertained where existing buildings do not make a positive contribution to the character and appearance of the conservation area and the proposal can be shown to positively preserve or enhance that character and appearance.”* No 55 Southwark Street is considered to contribute positively to the conservation area and therefore its demolition would be resisted unless, as set out in Saved Policy 3.16, all of the following requirements can be demonstrated to be met:

*“i. Costs of repairs and maintenance would not be justified, when assessed against the importance of the building and the value derived from its continued use, providing that the building has not been deliberately neglected; and
ii. Real efforts have been made to continue the current use or find a viable alternative use for the building; and
iii. There will be substantial planning benefits for the community from redevelopment which would decisively outweigh loss from the resulting demolition; and
iv. The replacement development will preserve or enhance the character or appearance of the conservation area and has been granted planning permission.”*

82. The submitted material fails to demonstrate compliance with any of the requirements set out above. Furthermore, it is not considered that the proposed replacement would preserve or enhance the character or appearance of the conservation area. The demolition of the existing building therefore cannot be supported.
83. In reviewing the replacement building, Saved Policy 3.16 also sets out the following requirements for new development within conservation areas:

*“ i. Respect the context of the conservation area, having regard to the content of Conservation Area Appraisals and other adopted Supplementary Planning Guidance / Documents; and
ii. Use high quality materials that complement and enhance the conservation area; and
iii. Do not involve the loss of existing traditional features of interest which make a positive contribution to the character or appearance of the Conservation Area; and
iv. Do not introduce design details or features that are out of character with the area, such as the use of windows and doors made of aluminium, uPVC or other non-traditional materials.”*
84. The development would fail to comply with these policy requirements and it is therefore considered that it would result in unjustifiable harm to the character and appearance of the conservation area. The proposals completely fail to pick up on any of the strong and successful references of the fine neighbouring buildings. Instead they willfully dominate the area and react against these fine London buildings.
85. The submitted documents make explicit references to various iconic Russian buildings. This overtly Russian aesthetic is not considered appropriate for this context as it would completely fail to respond to the unique character of the conservation area, or even wider London context.
86. The expanse of glass and steel in this building is considered completely inappropriate given the surrounding context of finely detailed brick and stone buildings. As discussed above, the space rocket form and geometry is considered alien to the surrounding townscape and to lack any clear or convincing design justification relating to the all important principles of place making.
87. The east and west elevations are considered inappropriately austere, particularly when viewed from the existing roof terrace on the Menier Building. Given the visibility of the northern façade a greater degree of articulation and visual interest would be required.

88. This scheme has been presented to Southwark's Conservation Area Advisory Group (CAAG). The minutes of their meeting record an objection to this scheme and their view is also that the proposal of such prominent site on Southwark Street is insensitive and has no regard to the adjoining listed building and the scheme shows no appreciation of the history, architecture and character of Southwark Street and is alien to the architecture of London.
89. CAAG also echoes Officers' view that the tower is wholly inappropriate in character and scale and lies outside the area designated for high buildings in the London and Southwark plans.
90. In addition to the harm that would be caused to the Thrale Street Conservation Area within which the development would sit, the proposals would also fail to preserve or enhance the setting of the designated heritage assets, mostly notably the Menier Building Nos 51 and 53 Southwark Street and the nearby Borough High Street and Union Street Conservation Areas. The proposal would also impact on the wider setting of other heritage assets that are in the vicinity of the site.
91. It has already been noted above that most significantly harmful impacts would be on the setting of the Menier Building. Fundamentally, the proposals would dominate the setting of this fine Victorian Building, the heritage significance of which would be substantially harmed. The poor quality design of the street fronting block would disrupt the well established scale of the street, detract from the curve and fine detailing of the listed building.
92. Section 12 of the NPPF sets out national requirements relating the impact of development proposals on designated and undesignated heritage assets. Given the sensitive heritage setting of this site, it is not considered that sufficient information has been submitted to satisfy this requirement. Based on the assessment set out above, it is considered that the proposals would result in substantial harm to the designated heritage assets surrounding the site. The NPPF therefore states that consent should be refused unless it can be demonstrated that the harm is necessary to achieve substantial public benefits that outweigh that harm or loss. The public benefit of bringing a vacant site back into appropriate use does not outweigh the harm that this building would cause to the character of the area and the special architectural and historic interest of the surrounding designated heritage assets.
93. Design and heritage summary:
The location is not appropriate for a tall building, as defined in the Southwark Plan, Core Strategy and London Plan; Core Strategy policy CS12 notes that in the wrong location tall buildings can be overbearing and out of character. This is the case here, and the literal depiction of a space rocket is an alien and entirely inappropriate response to the heritage context. The NPPF states, at para 64, that permission should be refused for 'development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions'. The submitted scheme in its totality would, through its insensitive design and overbearing form, fail to preserve or enhance the conservation area and the settings of adjoining and nearby listed buildings and other conservation areas. This unacceptable development would result in substantial harm to the townscape character of the area and would fail to meet the planning policies set out in the national, regional and local plans.

Archaeology

94. The site is within the Borough, Bermondsey and Rivers Archaeological Priority Zone. The site stands at an important location within the Roman town. The site is also

adjacent to a known large-scale Roman stone building located and reported at the time of its construction.

95. The applicant has undertaken an archaeological evaluation on site, and submitted a written scheme of investigation which details the archaeological approach to the site. Should any planning permission be granted, the archaeological works would be undertaken as detailed in the written scheme of investigation by Pre-Construct Archaeology version dated May 2014.
96. The Council's Archaeologist has reviewed the submission and raises no objection but has recommended that the details of foundation design and the submission of a timely archaeological report should also be secured via conditions should the application be granted permission.

Affordable Housing

97. The application provides 9 duplex flats. The total approximate floor area for each flat would be 268sqm and whilst the Council would normally encourage units to exceed the minimum standards, the decision to arrange the tower as 9 very large private flats raises a number of policy issues relating to efficient use of land, and affordable housing.
98. As discussed earlier in the report, the scale and massing represents an unacceptable and inappropriate form of development. However, the inclusion of 2,621sqm of residential floorspace on the site arranged as just 9 flats would in itself be considered an inefficient use of that land, contrary to saved policy 3.11 'Efficient Use of Land' which states that all developments should ensure that they maximise the efficient use of land. In a more conventional arrangement, with a mix of generously sized but more conventional flats, a development could expect to reasonably accommodate around 30 flats within this floor area. In the current arrangement, each flat is 3 times the size of a conventionally sized 3 bedroom flat as required by the council's minimum floorspace standard.
99. The site is within the CAZ and has the highest PTAL rating. The density sought in this location would be between 700-1100 Habitable rooms/hectare (HR/Ha). Officers have calculated the residential density to be approximately 991HR/Ha, which does fall within the range in this central location. The calculation of density would assume more conventionally sized rooms; nevertheless, density *per se* should not be the sole determining factor. A key concern is the assumption by the applicant that by providing 9 flats the development avoids the obligation to provide affordable housing.
100. London Plan policy 3.13 'Affordable Housing Thresholds' states that boroughs should normally require affordable housing provision on sites which have the capacity to provide 10 or more homes. It goes on to explain that the affordable housing policy should be applied where a site would normally provide capacity for 10 or more homes, but a proposal provide less because it provides larger homes. It expects boroughs to ensure that such proposals make an equitable contribution to meeting affordable housing needs.
101. London Plan policy 3.13 'Affordable Housing Thresholds' states that boroughs should normally require affordable housing provision on sites which have the capacity to provide 10 or more homes. It goes on to explain that the affordable housing policy should be applied where a site would normally provide capacity for 10 or more homes, but a proposal provide less because it provides larger homes. It expects boroughs to ensure that such proposals make an equitable contribution to meeting affordable housing needs.

102. Strategic Policy 6 'Homes for People on Different Incomes' requires development of 10 or more units to provide affordable housing. The draft Affordable Housing SPD (2011) provides further clarity on this point by explaining that developments which appear to be designed to avoid the threshold at which affordable housing is required may need to be revised following an assessment of site capacity. The application gives no explanation for the size or mix, only describing these as 'luxury' flats. The application assumes that the 10 units threshold is absolute, and so gives no justification for the lack of affordable housing provision. Since the development is fundamentally unacceptable in terms of its form and height, officers have not sought any changes to the flat layouts to address London Plan policy 3.13. It is recommended that the application be refused due to its failure to make any provision for affordable housing, contrary to London Plan policy 3.13, Core Strategy policy SP6 and SP7, and saved Southwark Plan policy 4.4, together with the further guidance in the Affordable Housing SPD's.

Housing Quality

103. Saved Policy 4.2 'Quality of Residential Accommodation' states that planning permission will be granted for residential development where it achieves good quality living conditions, including outlook, privacy, and natural daylight.
104. The residential flats are designed to be duplex apartments over 2 floors and have two layout designs. Flats 1, 3, 5, 7 and 9 have the same flat layout and have 2 dedicated bedrooms (although the study room could be counted as an additional bedroom). Apartments 1, 3, 5, 7 and 9 will have access to the 7th floor green roof space but no private amenity space. Flats 2, 4, 6 and 8 share the same layout and have 3 bedrooms with 3 separate private balconies per flat.
105. The residential design standards SPD (2011) states that for units containing three or more bedrooms (and in this case the large studies in some flats equate to a third bedroom), 10 sqm of private amenity space is required and this scheme does not achieve this. Private balconies of over 12sqm are proposed for Flats 2, 4, 6 and 8, but none are provided for units 1, 3, 5, 7 and 9.
106. Daylight and sunlight
No daylight and sunlight report has been submitted to indicate the levels of natural light for the future occupants in the flats, but as this has a circular plan form and is completely glazed and there are no other structures of this height in close proximity, it is expected that the units would have good levels of daylight. All of the proposed units would have dual aspect and good outlook.
107. Privacy
There are no immediate adjoining residential properties to the site and given the height of the tower, it is unlikely to have any privacy issues for both nearby residents and the future occupants of the scheme.
108. Noise
A noise report has not been submitted by the applicant and for a site that is on a busy road and close to a railway line a formal noise assessment would be expected. It is not clear how the residential internal noise levels could be achieved and whilst conditions could be imposed to ensure compliance with the standards, Officers would need at least a baseline assessment. If the Council were to approve this application, further discussion would be required about the means by which future residents would be protected from noise and vibration. It is expected that a technical solution could be designed to create an acceptable residential environment. Since this issue would be likely to be capable of being overcome by design or conditions, it is recommended that the issue is recorded in an informative note on the decision notice, rather than forming

a reason for refusal is recommended that this issue be raised as an informative on the decision notice in order that the applicant could address the issue in any subsequent application.

109. Air quality for residents

The development is in an Air Quality Management Area (AQMA). The applicant has not prepared an Air Quality assessment. For this central London location on a main bus route, it is anticipated that there will be a need for mitigation as the pollutants concentrations are predicted to be above the air quality objectives.

110. Mechanical ventilation in the form of mechanical heat recovery systems are proposed as no windows are openable to the flats above and this would at least protect indoor air quality. The Environmental Protection Team (EPT) considers that for such a large scheme to be submitted without any relevant reports considering EPT matters is unacceptable, and this issue is raised as a suggested reason for refusal.

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

111. The site is located in an area which already contains similar uses, including the Menier Theatre, and a range of office and residential uses. It is not considered that any of the proposed uses, if controlled by appropriate conditions for instance in relation to hours of opening, would have a significant adverse impact on neighbouring uses.
112. In terms of the height and form of the development, the applicant has submitted very limited information to assess the micro climate and daylight and sunlight impacts.
113. Whilst the neighbouring properties are mainly in commercial use, it is still considered that the application should provide a proper and thorough daylight and sunlight assessment. There are certainly a number of residential units scattered around in the vicinity of the site, particularly on Thrale Street to the north and Union Street to the south. The applicant has only provided a basic illustrative shadow diagram analysis and does not go on to detail the effect of the shadowing. Developments of this height and scale would be expected to submit an assessment by a suitably qualified professional using the British Research Establishment (BRE) guidelines 'Site Layout Planning and Daylight and Sunlight' (2011). In the absence of such supporting document, it is not considered that any reliable conclusions can be reached on the daylight and sunlight impact of the development upon neighbouring properties.
114. The development could potentially have a significant adverse impact on the neighbouring occupants' amenity in terms of daylight and sunlight and fails to comply with Strategic Policy 13 'High Environmental Standards' and Saved Policy 3.2 'Protection of Amenity'.
115. London Plan Policy 7.6 'Architecture' and Policy 7.7 'Location and Design of Tall and Large Buildings' seeks to ensure that buildings and structures should not cause unacceptable harm to the amenity of surrounding land and buildings, particularly residential buildings, in relation to privacy, overshadowing, wind and micro climate. This is particularly important for tall buildings.
116. The applicant has carried out very limited assessment on the potential wind tunnel effect that will result from this new tall building and any increased ground wind speeds. The applicant has merely explained that as the tall building is circular, any wind hitting it will not be deflected down but dispersed. The applicant also claims that as the tower is situated on a lower building, any deflected wind patterns would not affect pedestrians at ground floor level.

117. Without a detailed and evidence-based assessment, Officers cannot carry out a thorough analysis on the micro climate effects. As such, the development would potentially have a significant adverse impact on the micro climate and fails to comply with London Plan policies 7.6 and 7.7 and Strategic Policy 13 of The Core Strategy.

Transport issues

118. The transport planning group has reviewed the submitted documents, but concluded that it is not possible to properly assess the application as insufficient information has been provided. Given the size of development and the mix of uses including a theatre, a Transport assessment should have been submitted.
119. The applicant has submitted within their design and access statement a brief explanation of the accessibility of the site and an account of the access arrangements. The site is within an area that has excellent access to public transport with a PTAL rating of 6b. Notwithstanding the lack of information for a full assessment and the site's good public transport links, the site would provide for over 10,000sqm of mixed use floorspace. The number of visitors, staff and residents would generate a significant increase in trips to the site and this has not been assessed by the applicant. Furthermore, the scale of the development would be expected to have a significant impact on the local highway network. Mitigation measures would be required to deal with the impacts of the development on the highway and the immediate public realm. The applicant has not proposed any transport site-specific measures and no S106 financial contributions have been offered to allow the Council to secure these improvements.
120. The application shows servicing to the rear (south side) of the site, via Union Street. The vehicles would use a shared access routes alongside the railways arches, on land owned by Network Rail. The applicant has stated that they have existing rights over this land, although it has not been possible to verify this with Network Rail or the applicant. The use of this land to service a large development (which would require large scale deliveries such a sets and scenery) would potentially inhibit the operation of other uses in the arches, and compromise pedestrian access to the proposed flats. The applicant should provide further information to explain how its servicing will be managed with the other users of this access and that sufficient space is provided to ensure the other uses can undertake their business/servicing without blocking the route and causing vehicles to wait on the highway. The lack of detailed analysis and explanation in the submitted documents means that officers cannot be confident that a long term, sustainable and workable servicing strategy could be secured, and therefore the risk remains that the development would cause harm to the highway network, and to the amenities of other occupiers.
121. There is no car parking proposed and in this area a car-free scheme would normally be acceptable. However the submitted plans show a car lift in the basement, ground, first and second floors, but the applicant has not indicated what this car lift would be for. Provision for disabled parking may be required in view of the uses being proposed; the application states that no wheelchair flats would be provided, but not how disabled visitors to the theatre or other uses would be accommodated.
122. The proposed development would provide some cycle parking at the southern side of the building off Southwark Bridge Road. The plans indicate that these would be within a narrow gap between the proposed building and the adjoining building to the west (City Bridge House). There is no indication as to the number of cycle spaces and the location along a narrow alley way means that these would not be convenient or safe. The applicant has indicated that public cycle provision (for visitors) is available on the public highway, which is unacceptable and this scale of development would be expected to make additional provision within the site boundary for its visitors.

123. The lack of cycle parking for staff, residents and visitors would be contrary to Saved Policy 5.3 of The Southwark Plan as no effort has been made to encourage other sustainable forms of transport to and from the site. Furthermore, no Travel Plan has been submitted.
124. Likewise, there is insufficient information on the use of car clubs (such as Zipcar). The applicant merely states that the new residents would have access to car-share opportunities, but makes no provision to expand the car club provision or provide membership for its new residents.
125. The lack of information and proper provision for servicing, cycle parking and disabled parking is contrary to Southwark Plan and London Plan policies and as such the application cannot demonstrate that it would provide a sustainable form of development.

Impact on trees

126. There are no existing trees on the site as it is currently used as a surface car park. The applicant has proposed a 'public' courtyard on the first floor, sandwiched between the north and south block. The plans indicate that some planting would be proposed within this courtyard, but there is no indication as to the size, number, height and species of the trees/plants. The trees/plants would not be visible from the street and therefore no enhancement or benefit to the streetscape or townscape is evident.

Planning obligations (S.106 undertaking or agreement)

127. Saved policy 2.5 'Planning Obligations' of the Southwark Plan, Strategic Policy 14 'Implementation and Delivery' of the Core Strategy and Policy 8.2 of the London Plan advise that planning obligations should be secured to overcome the negative impacts of a generally acceptable proposal. Saved policy 2.5 is reinforced by the Supplementary Planning Document (SPD) on Section 106 planning obligations and community infrastructure levy (2015).
128. The applicant has argued that as this scheme provides public good, in terms of new jobs and regeneration through a new theatre attracting tourists and local people, no S106 payment is required.
129. Since the submission of the application, the Southwark CIL SPD was adopted in April 2015. The intention of the CIL Regulations is that S106 planning obligations should mainly be used to secure site specific infrastructure which is needed to directly address the impact of development. The NPPF which echoes the Community Infrastructure Levy Regulation 122 which requires obligations be:
 - necessary to make the development acceptable in planning terms;
 - directly related to the development; and
 - fairly and reasonably related in scale and kind to the development
130. Only defined site specific mitigation that meets the tests in regulation 122 can be given weight. In this instance, there are a number of potential impacts of the scheme that would need to be mitigated through s106 contributions to make the development acceptable in planning terms.
131. Amenity space
The scheme does not provide the required private amenity space for all of the flats.
132. Officers consider that there should be mitigation measures for the shortfall of private

amenity space. The council's adopted S106 SPD 2015 seeks a S106 planning obligation to help improve open space elsewhere near to the development site and any shortfall in the required provision of amenity space will be charged at a specific rate.

133. Heritage

Given that the site is within an archaeological priority zone (APZ), the SPD seeks S106 planning obligations to support Southwark's effective monitoring of archaeological matters. This will make sure that this archaeology is properly managed and preserved. The applicant has not offered any contribution towards future monitoring of archaeology matters.

134. Car clubs

Given the car-free development, it is expected that future residents should have access to car clubs in the area. The Council would normally seek 3 years of free car club membership for each eligible resident and this would be secured under a s106 agreement and paid for by the developer.

135. Transport and public realm

The applicant has not provided adequate information for Officers to consider whether site-specific transport or public realm works would be required. It is expected for a development of this size and scale that some form of contribution to improvements and enhancements to the immediate local area surrounding the development is required such as to the paving works, enhancement of routes to public transport hubs and works to provide the 'Low-Line'.

136. Employment

One of Southwark's Economic Well-being Strategy objectives is for regeneration and development to provide lasting jobs for residents in both construction and related industries and jobs in completed developments. This can be supported through the funding of skills and training programmes for unemployed residents.

137. The council seeks to secure a S106 planning obligation to help place unemployed jobseekers from the local area into jobs within the construction stage of a development. This would be through the agreement of targets and an obligation for developers to provide their own programme and/or work with council programmes to achieve them. In addition no mechanism has been offered to support local people to access the estimated 328 jobs in the completed development.

138. The applicant has not indicated whether they would provide their own construction workplace co-ordinator and arrange the required training. There are targets set out in the SPD and the applicant has not agreed to meet these. Furthermore, in the event that these targets are not met, there will be a charge for the missed output and the Council reserves the right to request such sum as the council considers may reasonably be required. This would normally be drafted in the S106 agreement but in the absence of such an agreement the 'under performance' charge cannot be secured.

139. In the absence of a signed Section 106 Agreement, there is no mechanism in place to avoid or mitigate the impact of the proposed development on employment, public open space, the transport network, the public realm and affordable housing, and the proposal would therefore be contrary to saved policy 2.5 of the Southwark Plan (2007), strategic policy 14 of the Core Strategy (2011) and Policy 8.2 of the London Plan (2011)

140. Mayoral Community Infrastructure Levy (CIL)

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.

141. In Southwark the Mayoral CIL (MCIL) was established at a rate of £35 per sqm of new development, although this is an index linked payment. The Southwark CIL (SCIL) rate is based on the type and location of the development.
142. If an application is refused, no CIL payment is liable. If planning permission was to be granted, the SCIL would total **£1,370,638** and MCIL equates to **£399,384**.

Sustainable development implications

143. London Plan Policy 5.2 outlines that development proposals should make the fullest contribution to minimising carbon dioxide emissions in line with the Mayor's energy hierarchy. Strategic Policy 13 'High Environmental Standards' of the Core Strategy also stipulate that development should be designed of the highest environmental standards.
144. The applicant has submitted within their design and access statement an energy strategy in the appendices and demonstrates how the scheme would comply with the London Plan energy hierarchy, which should be as follows:
 - Be lean - use less energy;
 - Be clean - Supply energy efficiently;
 - Be green - use renewable energy.
145. The energy strategy report, which is appended to the design and access statement states that the measures shall provide 36.4% reduction in carbon emissions due to use of on-site renewable and low carbon technologies. The statement also states that the measures shall provide 46% of building regulated energy use through the use of on-site renewables and low carbon technologies.
146. Nevertheless, the applicant has not demonstrated fully how the energy hierarchy has been followed. As outlined in the Mayor's Sustainable, Design and Construction SPG, since 6 April 2014 the Mayor has applied a 35% carbon reduction target beyond Part L 2013 of the Building Regulations. There is no confirmation from the submitted document that the energy savings have been based on Part L 2013.
147. The regulated CO2 savings from energy efficiency alone should be determined relative to the Target Emissions Rate (TER) or a Part L 2013 Building Regulations compliant development. The submitted document however, does not provide the detailed calculations and it also does not show the reduction to carbon emissions through energy efficiency measures alone (be lean).
148. Furthermore, the Mayor's advice is that after calculating the regulated emissions at each stage of the energy hierarchy, the percentage savings in regulated emissions over a Part L 2013 of the Building Regulations compliant development must be provided.
149. The submitted energy strategy lacks sufficient evidence and information on how the energy savings would be achieved in accordance with the GLA's guidance on preparing energy assessments (April 2015).
150. At the time of writing, the GLA has not provided the council with their Stage 1 report,

but it is expected that the GLA may raise further detailed comments in relation to energy.

Other matters

Flood Risk

151. The site is within a Flood Zone 3 and the applicant has submitted a flood risk assessment (FRA) and the Environment Agency (EA) raises no objection to the scheme overall.
152. There are a number of points raised however. The EA notes that a theatre and associated uses will be located at the lower ground floor levels and the preference is that basement levels are not incorporated within developments within areas at risk of flooding.
153. In terms of the flooding information referred to within the submitted FRA by RPS namely, the information obtained from the EA relating to modelled flood extents and levels has been superseded, because the EA's tidal River Thames flood modelling has been updated since the information was obtained. The EA has stated that they expect to review an up-to-date FRA for any planning application. However, on this occasion, the EA are adopting a pragmatic approach by not objecting to this planning application, as it is believed that the production of an updated FRA would not materially alter their stance on the proposed development.
154. The council's own flood and drainage team has also reviewed the application and whilst no drainage strategy is currently provided, this could be dealt with via condition. Notwithstanding this, the team has requested further clarifications be made on the groundwater levels and groundwater flows and the runoff rates for the site. Again, the lack of information does not allow for full assessment and would not meet Strategic Policy 13, where developments are required to help reduce flood risk by reducing water run-off, using sustainable urban drainage systems. The target is that major development must reduce surface water run-off by more than 50%

Contamination

155. The site is currently being used as a surface car park and the existing building is a temporary art studio. It is likely that given the uses some form of contamination is possible but no site investigation has been carried out. Whilst conditions could be imposed to secure further information such as remediation strategies, there should at least be a desk-top site contamination and preliminary risk assessment to identify any associated long term risks. EPT do not consider it acceptable for such a large application to be submitted without any relevant reports considering contamination. EPT has therefore recommended this application to be refused.

Consultations and pre-application advice

156. For all large-scale major application, a Statement of Community of Involvement is necessary from the applicant to record outcomes from consultation with the local community.
157. The applicant has submitted within their design and access statement a summary of their consultation exercise, which according to the applicant involved local people, local organisations, Southwark council and the Commission for Architecture and the Built Environment (CABE). Nevertheless, there is no clear summary of all the responses given. It also appears that most of the responses relate to the success of the existing Menier theatre rather than the proposed development itself.

158. The applicant has not provided clear information detailing when and where community meetings took place, what points the community raised and how the design has been revised to take account of the community response or if it has not, the reasons why.
159. The applicant did engage with the Local Planning Authority in 2010/2011 and the council gave advice based on an earlier iteration of this scheme. The pre-application advice was whilst the council would support the enhancement of arts or cultural facilities, the serious concerns about the form and design of the overall scheme meant that the scheme would not be acceptable. The advice provided by CABI at that time also raised serious concerns.
160. Since the advice in 2011, the applicant has not engaged further with the council (or the GLA) and no pre-application enquiry was submitted for this current scheme. It is expected that for a scheme of this scale, early engagement should have been made by the applicant as encouraged by the NPPF. The submitted scheme has not addressed those concerns highlighted in 2011 and the fundamental amendments which would be required to make the scheme acceptable would need to come forward under a fresh application.
161. Furthermore, the GLA would have expected to be engaged early in the process, but it is apparent that the applicant has not involved them in their design process. The GLA are not able to provide their Stage 1 comments prior to this report due to the timing of the meetings and will issue a combined Stage 1 and 2 once the committee makes a resolution on this application.

Conclusion on planning issues

162. The Council would welcome the beneficial redevelopment of this under-utilised site, which the conservation area appraisal notes could make a positive contribution to the local area. A development providing a mix of mix of cultural, arts, office and residential use would be appropriate in the CAZ and Strategic Cultural Area and would bring the neglected site back into use, contributing to the character, vitality and economic well-being of Bankside.
163. However, the applicant has not engaged with the council to agree an appropriate form for the development, and the scheme as submitted is wholly unacceptable. Para 58 of the NPPF expects planning authorities to approve sustainable development, but notes that developments should respond to local character and reflect the identity of local surroundings and materials.
164. The quality of the submitted documents, relative to the scale and impact of the development, is inadequate, and does not enable a rigorous and proper assessment of the impacts. No verified views, or proper townscape analysis was submitted, and no clear evidence base underpins the brief transport, daylight, amenity or microclimate reports.
165. The location is not appropriate for a tall building, and at 30 storeys the 'rocket' tower would stand as an isolated and incongruous feature in the townscape, whose design references and literal interpretation are completely alien to Southwark. This would cause significant harm not just to the local area, but to the skyline of London as a whole. The building does not meet the stringent tests for new tall buildings as set out in the London Plan and local policies, and this issue is reflected in many of the consultation responses.
166. The strong objections from Historic England, in terms of the quality of the documentation and the impact of the overall scheme are noted, as is the objection

from the conservation areas advisory group. Clear harm is caused to the heritage significance of the Thrale Street, Union Street and Borough High Street conservation areas, as well as to the setting of nearby listed buildings, most notably the adjacent Menier building.

167. The loss of the building at 55 Southwark Street has not been justified; it is considered to contribute positively to the conservation area, and its demolition would be resisted in the absence of a very high quality replacement building.
168. The application makes no provision for affordable housing despite the site having the capacity to accommodate many more than the 9 flats being proposed. In accordance with the London Plan and the affordable housing SPD, this scheme should make an equitable contribution to meeting affordable housing needs.
169. Servicing details have not demonstrated that the buildings could be serviced without compromising other users, and the development does not have regard to the “Low-Line” initiative which suggests a pedestrian route in this area. Whilst the Low-Line can be accorded little weight pending further progress on the New Southwark Plan, any future applications should expect to create a more positive active frontage to this south side of the site.
170. The submitted Energy Strategy lacks sufficient evidence and information on how the energy savings would be achieved in accordance with the GLA's Guidance and fails to demonstrate how the development would be sustainable.
171. The scale of the development would require a number of mitigation measures that would need to be secured via a Section 106 Agreement and in the absence of this, there is no mechanism in place to secure the required mitigation.
172. The NPPF makes it clear that sustainable development should be supported, and that this means approving development proposals which accord with the development plan. In this case, the merits of the development, in terms of economic growth and reuse of brown field land, are significantly and demonstrably outweighed by the harm to the local townscape and its heritage assets, and its failure to provide for affordable housing and mitigation of its impacts. As such, it is recommended that the application be refused subject to the response of the GLA.

Community impact statement

173. 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. The impact on local people is set out above, the following issues relevant to particular communities/groups likely to be affected by the proposal have been identified as none and the likely adverse or less good implications for any particular communities/groups have been also been discussed above.

Consultations

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

Consultation replies

175. Details of consultation responses received are set out in Appendix 2. Statutory and non-statutory consultation responses from Historic England and CAAG are also listed

in Appendix 2.

176. Summary of consultation responses

A total of 24 letters/emails have been received from neighbour consultation. 19 of those are objections and these comments are summarised below.

177. Objections to height, design and scale

The height of the proposed development is significantly higher than anything else in the area, it is not appropriate to have such a high rise building in an area with no other building of a similar height; This development will have an overbearing appearance on the small-scale buildings currently adjoining the site; this development is not with in keeping within the Conservation Zone that it sits with in; the local area has period warehouses, listed building as well as low level residential spaces; this tower would look severely out of place; it is of little design merit to mitigate it's opposing size and will negatively impact on the local conservation area; its appearance would be incongruous within the local scene and would not enhance the skyline; object to the demolition of another historical Southwark street property as Southwark Street historical properties need conserving; the proposed 30 storey tower will compromise the local amenity by initiating further ' unacceptable proposals for buildings of a 'similar' height as it would set a precedent; it provides no local amenity within the proposal as a whole; A 30 storey tower will significantly impede the local 'visual enjoyment' currently afforded to the residents and visitors of flat Iron Square /Southwark Bridge Road Southwark Street, Thrale Street and Union street; fail to deliver any significant improvements to the public realm; there is not enough detail about the tower.

Officers' response: The comments have been noted and Officers agree that this development is of an unacceptable scale, height and design and would harm the conservation area and the nearby heritage assets.

178. Amenity impacts

The height of the building could block out light to residents' flat, and also reduce privacy; air quality would be reduced; the planned 30-storey tower will overshadow the low-rise buildings of Union Street; and by the considerable noise which will be generated by the construction works and by the increased number of delivery and refuse removal vehicles in the area; the tower could create wind effects that might negatively affect residents of the surrounding low-rise building; the access strategy and the site waste strategy can not justify a development of this size.

Officers' response: In the absence of detailed information, Officers have not been able to fully assess the amenity impacts on neighbouring occupants. This is one of the reasons for refusal.

179. Principle of uses

There is no good housing mix in this development; suspects the developers will market this building overseas to investment purchasers, bringing in little by way of community involvement; the UK has an affordable housing crisis and sadly, this proposal does nothing to address this issue; also concerned about the cynicism of so few flats being included, thus negating the obligation to contribute to the community through section 106 payments; development is a property which contains little residential opportunity and certainly no social housing a Sui generis use would imply that there is no guarantee that the proposed planning proposal will actually deliver the proposed occupancy of a theatre/rehearsal space/ art space and museum centre; the current use of the property at 55 Southwark street is a well respected art academy. Southwark cannot be permitted to offer any planning approval without strict assurances/ conditions that ensure proposal would be delivered as they are proposed; this application would appear to be a strategic attempt to manipulate the borders of planning guideline- to provide increased site value- as it could now have the attributed planning consent; questions over what research or figures there are to demonstrate

the impact on the existing Menier theatre.

Officers' response: it is acknowledged that the development would fail to make most efficient use of the land and provide the necessary affordable housing. The lack of s106 contributions to mitigate the impacts of the development is also noted and is discussed above.

180. Sui generis class uses are unique and any planning permission that may be granted would ensure that only these uses would be permitted.

181. Consultation matters

No local notices appear to have been posted at any boundary wall of this site; No proposal of a demolition application has been posted outside the Building at 55 Southwark Street; no other local residents had received written notification that this application was being considered; the date of notification of this application has allowed only a minimum of 15 working days during the known summer vacation period.

Officers' response: Letters were sent out to neighbouring properties and two site notices were placed in front of the site on Southwark Street and Southwark Bridge Road on 23 July 2015. The consultation obligations have therefore been fulfilled.

182. Support

4 representations to support the scheme have been received:

The project will attract visitors to the Borough of Southwark bringing more business to the area, creating more employment for local people and enhancing the look with the raising of the standard of the architectural appearance of Southwark Street; this development represents a huge investment from Russia into Southwark and is enthusiastically received as a commercial project by the Russian Embassy; Southwark needs this type of commercial and cultural mix development; the current occupiers of this building have been kept informed by the applicants during the past three years and have been consulted regularly about the exterior design operations and is of the opinion that the exterior design is imaginative, bold and ideal for showcasing already successful Bankside theatres such as the adjacent Menier Chocolate Factory and the GLOBE; Southwark street is an interesting mix of Victorian and modern architecture and this new theatre design with its inspiring day and evening facade and rocket will be a beacon for the area; it will lure London residents and visitors with a promise of entertainment and good food and then further enchant them by providing a quiet, reflective terrace away from the roar and fumes of Southwark street traffic; the slim and unique Gagarin rocket, will become as loved and admired as the OXO tower or Tate chimney; it is certainly out of this world and what better place than Southwark for a monument to the Russian Space race; the incredible subtlety of the main booster pod is a welcome addition to the low scale Victorian architecture adjacent and certainly goes to show how far society has progressed in terms of elegance and sophistication; the pencil slim rocket a lighthouse to illuminate dull Southwark Street will provide 9 duplex apartments and the capital from these will provide London with a rare unsubsidized producing theatre; it is a wonderful offer to residents and visitors and in future a big attraction away from the Thames path which would also beckon visitors towards the renewed Elephant.

Human rights implications

183. 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.

184. This application has the legitimate aim of providing mixed use development. 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/1145-53 Application file: 14/AP/4773 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 5729 Council website: www.southwark.gov.uk

APPENDICES

No.	Title
Appendix 1	Consultation undertaken
Appendix 2	Consultation responses received
Appendix 3	Images
Appendix 4	Recommendation

AUDIT TRAIL

Lead Officer	Simon Bevan, Director of Planning	
Report Author	Wing Lau, Senior Planning Officer	
Version	Final	
Dated	17 September 2015	
Key Decision	No	
CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER		
Officer Title	Comments Sought	Comments included
Strategic director, finance & corporate services	No	No
Strategic director, environment and leisure	No	No
Strategic director, housing and community services	No	No
Director of regeneration	No	No
Date final report sent to Constitutional Team		24 September 2015

Consultation undertaken

Site notice date: 23/07/2015

Press notice date: 23/07/2015

Case officer site visit date: 23/07/2015

Neighbour consultation letters sent: 20/07/2015

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
Waste Management

Statutory and non-statutory organisations consulted:

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

Neighbour and local groups consulted:

58 Thrale Street London SE1 9HW
59 Thrale Street London SE1 9HW

55 Thrale Street London SE1 9HW
56 Thrale Street London SE1 9HW
57 Thrale Street London SE1 9HW
35 Southwark Bridge Road London SE1 9HH
Flat E 17 Southwark Bridge Road SE1 9HH
33 Park Street London SE1 9EA
35 Park Street London SE1 9EA
Flat B 17 Southwark Bridge Road SE1 9HH
Flat C 17 Southwark Bridge Road SE1 9HH
Flat D 17 Southwark Bridge Road SE1 9HH
4 Gatehouse Square London SE1 9HN
5 Gatehouse Square London SE1 9HN
6 Gatehouse Square London SE1 9HN
1 Gatehouse Square London SE1 9HN
2 Gatehouse Square London SE1 9HN
3 Gatehouse Square London SE1 9HN
Flat A 17 Southwark Bridge Road SE1 9HH
Flat 38 27 Park Street SE1 9EG

Part Third Floor Thames House SE1 9EL
Room Adj The North Antrium Suite The Hop Exchange SE1 1TY
Unit 10 16-48 Great Guildford Street SE1 0HS
16 Keppel Row London SE1 0FB
17 Keppel Row London SE1 0FB
18 Keppel Row London SE1 0FB
13 Keppel Row London SE1 0FB
14 Keppel Row London SE1 0FB
15 Keppel Row London SE1 0FB
22 Keppel Row London SE1 0FB
90a Southwark Street London SE1 0SW
90b Southwark Street London SE1 1RQ
19 Keppel Row London SE1 0FB
20 Keppel Row London SE1 0FB
21 Keppel Row London SE1 0FB
12 Keppel Row London SE1 0FB
3 Keppel Row London SE1 0FB
4 Keppel Row London SE1 0FB
5 Keppel Row London SE1 0FB
Part Third Floor North Thames House SE1 9EL

Flat 39 27 Park Street SE1 9EG
 Flat 4 27 Park Street SE1 9EG
 Flat 35 27 Park Street SE1 9EG
 Flat 36 27 Park Street SE1 9EG
 Flat 37 27 Park Street SE1 9EG
 Flat 8 27 Park Street SE1 9EG
 Flat 9 27 Park Street SE1 9EG
 Intel House 24 Southwark Bridge Road SE1 9HF
 Flat 5 27 Park Street SE1 9EG
 Flat 6 27 Park Street SE1 9EG
 Flat 7 27 Park Street SE1 9EG
 15 Perkins Square London SE1 9HU
 9 Perkins Square London SE1 9HU
 11 Perkins Square London SE1 9HU
 13 Perkins Square London SE1 9HU
 7 Perkins Square London SE1 9HU
 10 Gatehouse Square London SE1 9HN
 11 Gatehouse Square London SE1 9HN
 12 Gatehouse Square London SE1 9HN
 7 Gatehouse Square London SE1 9HN
 8 Gatehouse Square London SE1 9HN
 9 Gatehouse Square London SE1 9HN
 1 Perkins Square London SE1 9HU
 3 Perkins Square London SE1 9HU
 5 Perkins Square London SE1 9HU
 13 Gatehouse Square London SE1 9HN
 14 Gatehouse Square London SE1 9HN
 15 Gatehouse Square London SE1 9HN
 Flat 34 27 Park Street SE1 9EG
 Flat D Cromwell Flats SE1 9HP
 Flat E Cromwell Flats SE1 9HP
 Flat F Cromwell Flats SE1 9HP
 Flat A Cromwell Flats SE1 9HP
 Flat B Cromwell Flats SE1 9HP
 Flat C Cromwell Flats SE1 9HP
 Flat K Cromwell Flats SE1 9HP
 Flat 10 27 Park Street SE1 9EG
 Flat 11 27 Park Street SE1 9EG
 Flat G Cromwell Flats SE1 9HP

 Flat H Cromwell Flats SE1 9HP
 Flat J Cromwell Flats SE1 9HP
 Flat G 33 Southwark Bridge Road SE1 9HH
 Flat D 33 Southwark Bridge Road SE1 9HH
 Flat E 33 Southwark Bridge Road SE1 9HH

 Flat F 33 Southwark Bridge Road SE1 9HH
 Flat A 33 Southwark Bridge Road SE1 9HH
 Flat B 33 Southwark Bridge Road SE1 9HH
 Flat C 33 Southwark Bridge Road SE1 9HH
 Flat 26 27 Park Street SE1 9EG
 Flat 27 27 Park Street SE1 9EG
 Flat 28 27 Park Street SE1 9EG
 Flat 23 27 Park Street SE1 9EG

 Flat 24 27 Park Street SE1 9EG
 Flat 25 27 Park Street SE1 9EG
 Flat 32 27 Park Street SE1 9EG
 Flat 3 27 Park Street SE1 9EG
 Flat 33 27 Park Street SE1 9EG
 Flat 29 27 Park Street SE1 9EG
 Flat 30 27 Park Street SE1 9EG
 Flat 31 27 Park Street SE1 9EG
 Flat 2 27 Park Street SE1 9EG
 Flat 14 27 Park Street SE1 9EG
 Flat 15 27 Park Street SE1 9EG
 Flat 16 27 Park Street SE1 9EG
 Flat 12 27 Park Street SE1 9EG

 Flat 1 27 Park Street SE1 9EG
 Flat 13 27 Park Street SE1 9EG
 Flat 20 27 Park Street SE1 9EG
 Flat 21 27 Park Street SE1 9EG
 Flat 22 27 Park Street SE1 9EG
 Flat 17 27 Park Street SE1 9EG
 Flat 18 27 Park Street SE1 9EG
 Flat 19 27 Park Street SE1 9EG
 77-79 Union Street London SE1 1SG
 83-87 Union Street London SE1 1SG

 1 Keppel Row London SE1 0FB
 2 Keppel Row London SE1 0FB
 9 Keppel Row London SE1 0FB
 10 Keppel Row London SE1 0FB
 11 Keppel Row London SE1 0FB
 6 Keppel Row London SE1 0FB
 7 Keppel Row London SE1 0FB
 8 Keppel Row London SE1 0FB
 Part Basement And Third Floor 61 Southwark Street SE1 1SA
 Room 19 Third Floor Tulip House SE1 1XF
 Room 23 Third Floor Tulip House SE1 1XF
 Room 26 Fourth Floor Tulip House SE1 1XF
 Room 14 Second Floor Tulip House SE1 1XF
 Room 15 Second Floor Tulip House SE1 1XF
 Room 18 Second Floor Tulip House SE1 1XF
 Room 8 First Floor Tulip House SE1 1XF
 Room 9 First Floor Tulip House SE1 1XF
 Room 17 Second Floor Tulip House SE1 1XF
 Units 402 To 403 16-48 Great Guildford Street SE1 0HS
 Basement Cunchos SE1 1RQ
 Room 3 Ground Floor Tulip House SE1 1XF
 Part Basement Peer Group The Hop Exchange SE1 1TY
 Ground Floor Rear Tulip House SE1 1XF
 First Floor Rear Tulip House SE1 1XF
 Part Lower Ground Floor The Hop Exchange SE1 1TY
 Unit 03 16-48 Great Guildford Street SE1 0ES
 Unit 04 16-48 Great Guildford Street SE1 0ES
 Second Floor Front 61 Southwark Street SE1 0HL
 Room 22 Third Floor Tulip House SE1 1XF
 Room 20 Third Floor Tulip House SE1 1XF
 Room 21 Third Floor Tulip House SE1 1XF
 Room 16 Second Floor Tulip House SE1 1XF
 Room 24 Fourth Floor Tulip House SE1 1XF
 Room 25 Fourth Floor Tulip House SE1 1XF
 7 Triangle Court 10-18 Redcross Way SE1 1TA
 Room 5 Ground Floor Tulip House SE1 1XF
 Room 4 Ground Floor Tulip House SE1 1XF
 18 Great Guildford Street London SE1 0FD
 Lower Ground And Mezzanine And Third Floor And Fourth
 Floor 36 Southwark Bridge Road SE1 9EU
 Workshop Peabody Buildings SE1 0TW
 Living Accommodation 9 Stoney Street SE1 9AA
 Unit 202 Great Guildford Business Square SE1 0HS
 Unit 15 100 Southwark Street SE1 0SW
 Basement And Ground Floor And Second Floor To Fifth Floor
 76-80 Southwark Street SE1 0PN
 Second Floor 81 Southwark Bridge Road SE1 0NQ
 Unit 301 16-48 Great Guildford Street SE1 0HS
 Unit 302 16-48 Great Guildford Street SE1 0HS
 Second Floor 82 Borough High Street SE1 1LL
 Third Floor 82 Borough High Street SE1 1LL
 First Floor Great Guildford Business Square SE1 0HS
 Third Floor Evans Lombe House SE1 1XW
 Basement And Ground Floor Great Guildford Business Square
 SE1 0HS
 Unit 7 And Unit 7a Great Guildford Business Square SE1 0HS
 Fifth Floor Intel House SE1 9HF
 Sixth Floor Intel House SE1 9HF
 Fourth Floor Intel House SE1 9HF
 Basement The Ragged School SE1 1SG
 Second Floor Intel House SE1 9HF
 Third Floor Intel House SE1 9HF
 Basement Intel House SE1 9HF
 Ground Floor Intel House SE1 9HF
 First Floor Intel House SE1 9HF
 Apartment 4 Penthouse 1 Playhouse Court SE1 0AT
 The Wheatsheaf The Hop Exchange SE1 1TY
 Basement And Ground Floor 44-48 Borough High Street SE1
 1XB
 First Floor To Third Floor 44-48 Borough High Street SE1 1XB
 First Floor 1 Playhouse Court SE1 0AT
 Bankside 2 And 3 90-100 Southwark Street SE1 0SW
 Church Of The Most Precious Blood Omeara Street SE1 1TE
 29 Great Guildford Street London SE1 0ES
 Unit 1 88 Union Street SE1 0NW
 Unit 3 The Ragged School SE1 1SG
 Basement And Ground Floor 4 Park Street SE1 9AB
 Third Floor Flat 54 Borough High Street SE1 1XL
 Flat 5 88 Union Street SE1 0NW

60 Southwark Street SE1 1UN
57-61 Union Street London SE1 1SG
69-71 Union Street London SE1 1SG
48 Union Street London SE1 1TD
50-52 Union Street London SE1 1TD
George Bell House 8a Ayres Street SE1 1ES
Flat 3 79-81 Union Street SE1 1SG
Sixth Floor Pentagon House SE1 1UN
1 Red Cross Cottages Ayres Street SE1 1EX
2 Red Cross Cottages Ayres Street SE1 1EX
3 Red Cross Cottages Ayres Street SE1 1EX
4 Whitecross Cottages Ayres Street SE1 1ET
5 Whitecross Cottages Ayres Street SE1 1ET
6 Whitecross Cottages Ayres Street SE1 1ET
Saxon House 48 Southwark Street SE1 1UN
4 Red Cross Cottages Ayres Street SE1 1EX
5 Red Cross Cottages Ayres Street SE1 1EX
6 Red Cross Cottages Ayres Street SE1 1EX
42 Southwark Street London SE1 1UN
10-18 Union Street London SE1 1SZ
Suite 83 To 84 The Hop Exchange SE1 1TY
30 Southwark Street London SE1 1TU
28 Southwark Street London SE1 1TU
First Floor Pentagon House SE1 1UN
Coffee House 63 Union Street SE1 1SG
8 Union Street London SE1 1SZ
56a Ayres Street London SE1 1EU
37a Union Street London SE1 1SD
Guild House 52d Borough High Street SE1 1XN
The Hop Exchange 24 Southwark Street SE1 1TY
3 Whitecross Cottages Ayres Street SE1 1ET
Flat 39 Pattison House Marshalsea Estate SE1 1EY
Flat 4 Pattison House Marshalsea Estate SE1 1EY
Flat 40 Pattison House Marshalsea Estate SE1 1EY
Flat 36 Pattison House Marshalsea Estate SE1 1EY
Flat 37 Pattison House Marshalsea Estate SE1 1EY
Flat 38 Pattison House Marshalsea Estate SE1 1EY
Flat 44 Pattison House Marshalsea Estate SE1 1EY
Flat 45 Pattison House Marshalsea Estate SE1 1EY
Flat 46 Pattison House Marshalsea Estate SE1 1EY

Flat 41 Pattison House Marshalsea Estate SE1 1EY
Flat 42 Pattison House Marshalsea Estate SE1 1EY
Flat 43 Pattison House Marshalsea Estate SE1 1EY
Flat 35 Pattison House Marshalsea Estate SE1 1EY
Flat 27 Pattison House Marshalsea Estate SE1 1EY
Flat 28 Pattison House Marshalsea Estate SE1 1EY
Flat 29 Pattison House Marshalsea Estate SE1 1EY
Flat 24 Pattison House Marshalsea Estate SE1 1EY
Flat 25 Pattison House Marshalsea Estate SE1 1EY
Flat 26 Pattison House Marshalsea Estate SE1 1EY
Flat 32 Pattison House Marshalsea Estate SE1 1EY
Flat 33 Pattison House Marshalsea Estate SE1 1EY
Flat 34 Pattison House Marshalsea Estate SE1 1EY
Flat 3 Pattison House Marshalsea Estate SE1 1EY
Flat 30 Pattison House Marshalsea Estate SE1 1EY
Flat 31 Pattison House Marshalsea Estate SE1 1EY
Southwark Tavern 22-22a Southwark Street SE1 1TU
25-33 Southwark Street London SE1 1RQ
Boot And Flogger 10-20 Redcross Way SE1 1TA
58 Borough High Street London SE1 1XF
62 Borough High Street London SE1 1XF
Art House Redcross Way SE1 1TA
Bishops Hall 8 Ayres Street SE1 1ES
1 Whitecross Cottages Ayres Street SE1 1ET
2 Whitecross Cottages Ayres Street SE1 1ET
Suite 10 To 11 The Hop Exchange SE1 1TY
Suite 7 To 9 The Hop Exchange SE1 1TY
56 Borough High Street London SE1 1XF

Flat 5 Pattison House Marshalsea Estate SE1 1EY
Flat 50 Pattison House Marshalsea Estate SE1 1EY
Flat 6 Pattison House Marshalsea Estate SE1 1EY
Flat 47 Pattison House Marshalsea Estate SE1 1EY
Flat 48 Pattison House Marshalsea Estate SE1 1EY
Flat 49 Pattison House Marshalsea Estate SE1 1EY
90 Borough High Street London SE1 1LL
69a Union Street London SE1 1SG
71a Union Street London SE1 1SG

Flat 6 88 Union Street SE1 0NW
Flat 7 88 Union Street SE1 0NW
Unit 2 88 Union Street SE1 0NW
Flat 3 88 Union Street SE1 0NW
Flat 4 88 Union Street SE1 0NW
Second To Fourth Floor 72-76 Borough High Street SE1 1XF
Flat 1 Shoemaker House SE1 0ES
Flat 2 Shoemaker House SE1 0ES
20 Great Guildford Street London SE1 0FD
22 Great Guildford Street London SE1 0FD
Room 77 The Hop Exchange SE1 1TY
Room 78 The Hop Exchange SE1 1TY
49 Southwark Bridge Road London SE1 9HH
Flat 3 Shoemaker House SE1 0ES
Flat 4 Shoemaker House SE1 0ES
39 Great Guildford Street London SE1 0ES
Flat 4 28 Park Street SE1 9EQ
Flat 5 28 Park Street SE1 9EQ
Flat 6 28 Park Street SE1 9EQ
Flat 1 28 Park Street SE1 9EQ
Flat 2 28 Park Street SE1 9EQ
Flat 3 28 Park Street SE1 9EQ
Unit 16 100 Southwark Street SE1 0SW
Flat 7 28 Park Street SE1 9EQ
Flat 8 28 Park Street SE1 9EQ
Third Floor South Wigglesworth House SE1 9HH
Fourth Floor And Fifth Floor 30 Park Street SE1 9EQ
Ground Floor Right 30 Park Street SE1 9EQ
Third Floor 30 Park Street SE1 9EQ
Flat 8 88 Union Street SE1 0NW
Flat 9 88 Union Street SE1 0NW
Flat 10 88 Union Street SE1 0NW
First Floor 9 Park Street SE1 9AB
Ground Floor 38-40 Southwark Street SE1 1UN
Living Accommodation Rose And Crown SE1 1SG
Flat 2 31 Union Street SE1 1SD
Flat 3 31 Union Street SE1 1SD
First Floor 56 Ayres Street SE1 1EU
Basement Front Ground Floor Front And First Floor Rear 42
Borough High Street SE1 1XW
First Floor Front 42 Borough High Street SE1 1XW
Basement And Ground Floor 56 Ayres Street SE1 1EU
Sixth Floor Rear 61 Southwark Street SE1 0HL
Basement And Ground Floor 12 Stoney Street SE1 9AD
First Floor 12 Stoney Street SE1 9AD
First Floor Rear 61 Southwark Street SE1 0HL
Fourth Floor Rear 61 Southwark Street SE1 0HR
Second Floor Rear 61 Southwark Street SE1 1SA
84-88 Union Street London SE1 0NW
Suite 11 100-112 Union Street SE1 0NL
Suite 13 100-112 Union Street SE1 0NL
Basement Thrale House SE1 9HW
Basement And Ground Floor 6 Union Street SE1 1SZ
52b Union Street London SE1 1TD
Basement 50 Southwark Street SE1 1UN
Rooms 80 To 82 The Hop Exchange SE1 1TY
4 Playhouse Court London SE1 0AT
Second Floor 50 Southwark Street SE1 1UN
First Floor 50 Southwark Street SE1 1UN
Ground Floor Rear 50 Southwark Street SE1 1UN
9 Playhouse Court London SE1 0AT
Ground Floor 64 Borough High Street SE1 1XF
First Floor 64 Borough High Street SE1 1XF
5-6 Playhouse Court London SE1 0AT
1 Playhouse Court London SE1 0AT
8 Playhouse Court London SE1 0AT
Third Floor 50 Southwark Street SE1 1UN
Second Floor Rear And Third Floor 42 Borough High Street
SE1 1XW
Unit 231 16-48 Great Guildford Street SE1 0HS
Ground Floor Rear 42 Borough High Street SE1 1XW
Second Floor Front 42 Borough High Street SE1 1XW
Fifth Floor 50 Southwark Street SE1 1UN
Fourth Floor 50 Southwark Street SE1 1UN
Units 406 To 408 16-48 Great Guildford Street SE1 0HS
First Floor Notcutt House SE1 9EU
53-61 Southwark Bridge Road London SE1 9HH
Part Basement Right 61 Southwark Street SE1 0HL

Flat 7 Pattison House Marshalsea Estate SE1 1EY
 Flat 8 Pattison House Marshalsea Estate SE1 1EY
 Flat 9 Pattison House Marshalsea Estate SE1 1EY
 46 Redcross Way London SE1 1HA
 Flat 5 Norfolk House SE1 1GJ
 Flat 6 Norfolk House SE1 1GJ
 Flat 7 Norfolk House SE1 1GJ
 Flat 2 Norfolk House SE1 1GJ
 Flat 3 Norfolk House SE1 1GJ
 Flat 4 Norfolk House SE1 1GJ
 Railway Arch 24 Redcross Way SE1 1TA
 77a Union Street London SE1 1SG

 Flat 8 Norfolk House SE1 1GJ

 Flat 9 Norfolk House SE1 1GJ

 Flat 10 Norfolk House SE1 1GJ

 Flat 1 Norfolk House SE1 1GJ

 20 Park Street London SE1 9EQ

 21 Park Street London SE1 9EQ
 10 Stoney Street London SE1 9AD
 25 Park Street London SE1 9EQ

 26 Park Street London SE1 9EQ
 53 Thrale Street London SE1 9HW
 22 Park Street London SE1 9EQ
 23 Park Street London SE1 9EQ
 24 Park Street London SE1 9EQ
 Bridge Studios 13 Park Street SE1 9AB
 Suite 60 To 63 The Hop Exchange SE1 1TY
 Fifth Floor Pentagon House SE1 1UN
 Suite 64 To 66 The Hop Exchange SE1 1TY
 Suite 45 To 47 The Hop Exchange SE1 1TY
 Suite 49 To 50 The Hop Exchange SE1 1TY
 2 Stoney Street London SE1 9AA

 5 Stoney Street London SE1 9AA
 6 Stoney Street London SE1 9AA
 First Floor North Thames House SE1 9EL

 Ground Floor Thames House SE1 9ER
 1 Stoney Street London SE1 9AA
 62 Union Street London SE1 1TD
 52a Borough High Street London SE1 1XN
 Suite 85 To 86 The Hop Exchange SE1 1TY
 55 Southwark Street London SE1 1RU
 58 Ayres Street London SE1 1EU
 50 Borough High Street London SE1 1XW
 St Saviours House 39-41 Union Street SE1 1SD
 Suite 87 To 89 The Hop Exchange SE1 1TY
 Suite 51 To 52 The Hop Exchange SE1 1TY
 39 Redcross Way London SE1 1HG
 35 Union Street London SE1 1SD
 City Bridge House 57 Southwark Street SE1 1RU
 88 Borough High Street London SE1 1LL
 40 Borough High Street London SE1 1XW
 Second Floor Crowne House SE1 1UN
 76 Borough High Street London SE1 1LL
 Suite 73 To 74 The Hop Exchange SE1 1TY
 17 Porter Street London SE1 9HD
 Units 325 And 326 16-48 Great Guildford Street SE1 0HS
 Basement And Ground Floor 5 Park Street SE1 9AB
 Basement And Ground Floor 9 Park Street SE1 9AB
 Unit 307 16-48 Great Guildford Street SE1 0HS
 Unit 308 16-48 Great Guildford Street SE1 0HS
 Units 322 And 323 16-48 Great Guildford Street SE1 0HS
 First Floor South Thames House SE1 9EL
 Second Floor Front Right Thames House SE1 9EL
 Second Floor Rear Right Thames House SE1 9EL
 Ground Floor 13 Park Street SE1 9AB
 17 Park Street London SE1 9AB
 Basement Thames House SE1 9EL
 Unit 306 16-48 Great Guildford Street SE1 0HS
 Units 328 And 329 16-48 Great Guildford Street SE1 0ES
 Unit 330 16-48 Great Guildford Street SE1 0HS

 Unit 206 16-48 Great Guildford Street SE1 0HS
 Units 05 16-48 Great Guildford Street SE1 0HS
 Units 102 To 104 16-48 Great Guildford Street SE1 0ES
 Unit 205 16-48 Great Guildford Street SE1 0HS
 Units 1 And 2 19-19a Great Guildford Street SE1 9EZ
 Unit 3 23 Great Guildford Street SE1 9EZ
 Unit 4 23a Great Guildford Street SE1 9EP
 Units 122 To 124 16-48 Great Guildford Street SE1 0ES
 Units 125 To 127 16-48 Great Guildford Street SE1 0ES
 Units 317 To 320 16-48 Great Guildford Street SE1 0ES
 First Floor 82 Borough High Street SE1 1LL
 Part Basement Room B3 16-48 Great Guildford Street SE1 0ES
 Part Basement Room B7 16-48 Great Guildford Street SE1 0ES
 Part Basement Rooms B1 To B2 16-48 Great Guildford Street SE1 0ES
 Part Basement Room B4 16-48 Great Guildford Street SE1 0ES
 Part Basement Room B5 16-48 Great Guildford Street SE1 0ES
 Part Basement Room B6 16-48 Great Guildford Street SE1 0ES
 Store 8 Warehouse Yard The Hop Exchange SE1 1TY
 The Atrium Suite The Hop Exchange SE1 1TY
 Workshop 3 And 4 Warehouse Yard The Hop Exchange SE1 1TY
 North Atrium Suite The Hop Exchange SE1 1TY
 Rooms 4 To 6 The Hop Exchange SE1 1TY
 Store 7 Warehouse Yard The Hop Exchange SE1 1TY
 Castle Corner Rear Of SE1 1TE
 Part Basement 61 Southwark Street SE1 0HL
 First Floor Left Thrale House SE1 1UN
 Ground Floor Left Thrale House SE1 1UN
 Ground Floor And Kitchen Unit The Hop Exchange SE1 1TY
 Basement 32 Southwark Bridge Road SE1 9EU
 First Floor 32 Southwark Bridge Road SE1 9EU
 Ground Floor 32 Southwark Bridge Road SE1 9EU
 Basement And Ground Floor 41 Great Guildford Street SE1 0ES
 Second Floor Flat 4 Omeara Street SE1 1TE
 Third Floor Flat 4 Omeara Street SE1 1TE
 Basement And Ground Floor 60 Southwark Bridge Road SE1 0AS
 Second Floor Left Wigglesworth House SE1 9HH
 Second Floor Right Wigglesworth House SE1 9HH
 Third Floor 32 Southwark Bridge Road SE1 9EU
 43-47 Southwark Bridge Road London SE1 9HH
 Basement 64 Borough High Street SE1 1XF
 Flat A 73-75 Union Street SE1 1SG
 Flat B 73-75 Union Street SE1 1SG
 Flat C 73-75 Union Street SE1 1SG
 Rooms 36 And 37 The Hop Exchange SE1 1TY
 Rooms 38 And 39 The Hop Exchange SE1 1TY
 Room 79 The Hop Exchange SE1 1TY
 First Floor Room 12 Tulip House SE1 1XF
 First Floor Room 11 Tulip House SE1 1XF
 First Floor Room 10 Tulip House SE1 1XF
 Rooms 34 And 35 The Hop Exchange SE1 1TY
 Unit 401 16-48 Great Guildford Street SE1 0HS
 Unit 404 16-48 Great Guildford Street SE1 0HS
 Unit 405 16-48 Great Guildford Street SE1 0HS
 9 Triangle Court 10-18 Redcross Way SE1 1TA
 3 Calverts Building 52 Borough High Street SE1 1XN
 81 Southwark Bridge Road London SE1 0NQ
 1-3 The Hop Exchange 24 Southwark Street SE1 1TY
 23-26 The Hop Exchange 24 Southwark Street SE1 1TY
 Unit 409 16-48 Great Guildford Street SE1 0HS
 Unit 410 16-48 Great Guildford Street SE1 0HS
 Second Floor Notcutt House SE1 9EU
 72-74 Borough High Street London SE1 1XF
 Second Floor Front 32 Southwark Bridge Road SE1 9EU
 First Floor 76-80 Southwark Street SE1 0PN
 Concierges Office Maidstone Buildings Mews SE1 1GD
 First Floor Flat 4 Omeara Street SE1 1TE
 Third Floor Flat 6 Union Street SE1 1SZ
 Second Floor Rear 32 Southwark Bridge Road SE1 9EU
 12 Triangle Court 10-18 Redcross Way SE1 1TA
 Basement And First Floor 51 Southwark Street SE1 1RU

Units 331 To Unit 333 16-48 Great Guildford Street SE1 OHS
 Units 315 And 316 16-48 Great Guildford Street SE1 OHS
 Unit 324 16-48 Great Guildford Street SE1 OHS
 Unit 327 16-48 Great Guildford Street SE1 OHS
 Units 129 To 131 16-48 Great Guildford Street SE1 OHS
 Unit 303 16-48 Great Guildford Street SE1 OHS
 Unit 305 16-48 Great Guildford Street SE1 OHS
 Unit 334 16-48 Great Guildford Street SE1 OHS
 Unit 08 16-48 Great Guildford Street SE1 OHS
 Unit 09 16-48 Great Guildford Street SE1 OHS
 Petrol Filling Station 97-113 Southwark Bridge Road SE1 0AX
 Ground Floor 3 Southwark Street SE1 1RQ
 First Floor 3 Southwark Street SE1 1RQ
 Basement And Ground Floor 64 Southwark Bridge Road SE1 0AS
 Basement 66 Southwark Bridge Road SE1 0AS
 Third Floor North Wigglesworth House SE1 9HH
 Basement 5-7 Southwark Street SE1 1RQ
 First Floor 5-7 Southwark Street SE1 1RQ
 Second Floor 5-7 Southwark Street SE1 1RQ
 Second Floor 3 Southwark Street SE1 1RQ
 Third Floor 3 Southwark Street SE1 1RQ
 Fourth Floor 3 Southwark Street SE1 1RQ
 Third Floor 62 Southwark Bridge Road SE1 0AS
 Ground Floor 34 Southwark Bridge Road SE1 9EU
 First Floor 34 Southwark Bridge Road SE1 9EU
 Second Floor 34 Southwark Bridge Road SE1 9EU
 Railway Arch 22 Redcross Way SE1 1TA
 Railway Arch 23 Redcross Way SE1 1TA

 5-6 Redcross Way London SE1 9HR
 Second Floor 58 Southwark Bridge Road SE1 0AS
 Third Floor 58 Southwark Bridge Road SE1 0AS
 Ground Floor 62 Southwark Bridge Road SE1 0AS
 Third Floor 34 Southwark Bridge Road SE1 9EU
 Basement And Ground Floor 58 Southwark Bridge Road SE1 0AS
 First Floor 58 Southwark Bridge Road SE1 0AS
 Unit 314 16-48 Great Guildford Street SE1 OHS
 Ground Floor 106-114 Borough High Street SE1 1LB
 First Floor 106-114 Borough High Street SE1 1LB
 Second Floor 106-114 Borough High Street SE1 1LB
 Fourth Floor 78-80 Borough High Street SE1 1LL
 Fifth Floor 78-80 Borough High Street SE1 1LL
 Basement And Ground Floor 82 Borough High Street SE1 1LL
 First Floor Warehouse Corner Of Stoney Street SE1 9DG
 Units 01 And 02 16-48 Great Guildford Street SE1 0ES
 Units 06 16-48 Great Guildford Street SE1 0ES
 Third Floor 106-114 Borough High Street SE1 1LB
 Fourth Floor 106-114 Borough High Street SE1 1LB
 Ground Floor Warehouse Corner Of Stoney Street SE1 9DG
 Third Floor 78-80 Borough High Street SE1 1LL
 First Floor And Second Floor Calverts Buildings SE1 1XN
 Basement Ground Floor And First Floor Evans Lombe House SE1 1XW
 Second Floor Evans Lombe House SE1 1XW
 Flat G 37 Southwark Bridge Road SE1 9HH
 Part Basement Part Ground Floor And First Floor To Fourth Floor 1 America Street SE1 0NE
 Fifth Floor 1 America Street SE1 0NE
 Ground Floor 78-80 Borough High Street SE1 1LL
 First Floor 78-80 Borough High Street SE1 1LL
 Second Floor 78-80 Borough High Street SE1 1LL
 Ground Floor 52b Borough High Street SE1 1XN
 Basement And Ground Floor 60 Borough High Street SE1 1XF
 Basement 78-80 Borough High Street SE1 1LL
 Unit 220 16-48 Great Guildford Street SE1 OHS
 Units 222 And 223 16-48 Great Guildford Street SE1 OHS
 Unit 226 16-48 Great Guildford Street SE1 OHS
 Units 213 To 216 16-48 Great Guildford Street SE1 OHS
 Unit 218 16-48 Great Guildford Street SE1 OHS
 Unit 219 16-48 Great Guildford Street SE1 OHS
 Units 309 And 310 16-48 Great Guildford Street SE1 0ES
 Units 311 And 312 16-48 Great Guildford Street SE1 0ES
 Unit 313 16-48 Great Guildford Street SE1 OHS
 Units 227 And 228 16-48 Great Guildford Street SE1 OHS

 Ground Floor Right 5-7 Southwark Street SE1 1RQ
 Ground Floor Left 5-7 Southwark Street SE1 1RQ
 Basement 4 Emerson Street SE1 9DU
 Second Floor And Third Floor Flat 11 Stoney Street SE1 9AD
 First Floor Flat 11 Stoney Street SE1 9AD
 Second Floor Rear 8 Playhouse Court SE1 0AT
 8 Triangle Court 10-18 Redcross Way SE1 1TA
 Ground Floor 84-88 Union Street SE1 0NW
 Basement And Ground Floor 103 Union Street SE1 0LA
 Basement Offices 2 Redcross Way SE1 9HR
 Third Floor 64 Borough High Street SE1 1XF

 Second Floor 64 Borough High Street SE1 1XF
 1 Triangle Court 10-18 Redcross Way SE1 1TA
 2 Triangle Court 10-18 Redcross Way SE1 1TA

 20 Triangle Court 10-18 Redcross Way SE1 1TA
 25a Sumner Street London SE1 9JZ
 18 Triangle Court 10-18 Redcross Way SE1 1TA
 10 Triangle Court 10-18 Redcross Way SE1 1TA
 11 Triangle Court 10-18 Redcross Way SE1 1TA
 3 Triangle Court 10-18 Redcross Way SE1 1TA
 4 Triangle Court 10-18 Redcross Way SE1 1TA
 5 Triangle Court 10-18 Redcross Way SE1 1TA
 6 Triangle Court 10-18 Redcross Way SE1 1TA
 11-17 Great Guildford Street London SE1 0ES
 Flat 3 41 Great Guildford Street SE1 0ES
 Flat 2 43 Great Guildford Street SE1 0ES
 Fourth Floor Flat 60 Southwark Bridge Road SE1 0AS
 First Floor Front Second Floor And Third Floor Flat 50-52 Borough High Street SE1 1XW
 Flat 1 41 Great Guildford Street SE1 0ES
 Flat 2 41 Great Guildford Street SE1 0ES
 Flat 7 Peabody Buildings SE1 0TL
 16 Peabody Buildings Southwark Street SE1 0TR
 Second Floor Flat 60 Southwark Bridge Road SE1 0AS
 Third Floor Flat 60 Southwark Bridge Road SE1 0AS

 Railway Arch 219-221 18 Stoney Street SE1 9BU
 Block B Flat 13 Peabody Estate SE1 0TP
 Block B Flat 14 Peabody Estate SE1 0TP
 Block F Flat 2 Peabody Estate SE1 0TQ
 Block B Flat 10 Peabody Estate SE1 0TP
 Block B Flat 11 Peabody Estate SE1 0TP
 Block B Flat 12 Peabody Estate SE1 0TP
 Block F Flat 6 Peabody Estate SE1 0TQ

 Block F Flat 7 Peabody Estate SE1 0TQ
 Block F Flat 8 Peabody Estate SE1 0TQ
 Block F Flat 3 Peabody Estate SE1 0TQ
 Block F Flat 4 Peabody Estate SE1 0TQ
 Block F Flat 5 Peabody Estate SE1 0TQ
 Block B Flat 9 Peabody Estate SE1 0TP
 Block K Flat 17 Peabody Estate SE1 0TN
 Block K Flat 18 Peabody Estate SE1 0TN
 Block B Flat 2 Peabody Estate SE1 0TP

 Block K Flat 14 Peabody Estate SE1 0TN
 Block K Flat 15 Peabody Estate SE1 0TN
 Block K Flat 16 Peabody Estate SE1 0TN

 Block B Flat 6 Peabody Estate SE1 0TP
 Block B Flat 7 Peabody Estate SE1 0TP
 Block B Flat 8 Peabody Estate SE1 0TP
 Block B Flat 3 Peabody Estate SE1 0TP
 Block B Flat 4 Peabody Estate SE1 0TP
 Block B Flat 5 Peabody Estate SE1 0TP

 Block C Flat 12 Peabody Estate SE1 0TR
 Block C Flat 13 Peabody Estate SE1 0TR
 Block C Flat 14 Peabody Estate SE1 0TR
 Block C Flat 9 Peabody Estate SE1 0TR
 Block C Flat 10 Peabody Estate SE1 0TR
 Block C Flat 11 Peabody Estate SE1 0TR
 Block A Flat 5 Peabody Estate SE1 0TW
 Block A Flat 6 Peabody Estate SE1 0TW
 Block A Flat 7 Peabody Estate SE1 0TW
 Block A Flat 2 Peabody Estate SE1 0TW
 Block A Flat 3 Peabody Estate SE1 0TW

Units 232 To 234 16-48 Great Guildford Street SE1 0HS
Unit 304 16-48 Great Guildford Street SE1 0HS
Units 209 And 210 16-48 Great Guildford Street SE1 0HS
Unit 101 16-48 Great Guildford Street SE1 0ES
Units 105 And 106 16-48 Great Guildford Street SE1 0ES
Unit 201 16-48 Great Guildford Street SE1 0HS
Units 203 And 204 16-48 Great Guildford Street SE1 0HS
Units 207 And 208 16-48 Great Guildford Street SE1 0HS
Units 107 And 108 16-48 Great Guildford Street SE1 0HS
Unit 109 To Unit120 16-48 Great Guildford Street SE1 0HS
Unit 121 16-48 Great Guildford Street SE1 0HS
Third Floor 5-7 Southwark Street SE1 1RQ
Basement And Ground Floor 73-75 Union Street SE1 1SG
Basement And Ground Floor 31 Union Street SE1 1SD
Basement And Ground Floor 37 Union Street SE1 1SD
54-58 Union Street London SE1 1TD
Second Floor Flat 6 Union Street SE1 1SZ
First Floor 1 St Margarets Court SE1 1XF
First Floor And Second Floor 10 Stoney Street SE1 9AD
Basement And Ground Floor 13 Stoney Street SE1 9AD
Store Adjacent 1 Peabody Buildings SE1 0TW
11 Sumner Street London SE1 9JZ
1 Flat Iron Square Southwark Bridge Road SE1 0AB
First To Third Floors 13 Stoney Street SE1 9AD
9 Sumner Street London SE1 9JZ
53 Southwark Street London SE1 1RU
The Ragged School 47 Union Street SE1 1SG
Seventh Floor 61 Southwark Street SE1 0HL
Caretakers Office The Hop Exchange SE1 1TY
Part Lower Basement The Hop Exchange SE1 1TY
Ground Floor 24a Southwark Street SE1 1TY
Room 67 The Hop Exchange SE1 1TY
Room 72 The Hop Exchange SE1 1TY
Rooms 75 And 76 The Hop Exchange SE1 1TY
Ground Floor Right Thrale House SE1 1UN
Part Second Floor Left Thrale House SE1 1UN
Part Second Floor Right Thrale House SE1 1UN
First Floor 24a Southwark Street SE1 1TY
Second Floor 24a Southwark Street SE1 1TY
Third Floor 24a Southwark Street SE1 1TE
Room 53 To 55 The Hop Exchange SE1 1TY
Part Basement The Hop Exchange SE1 1TY
Lower Ground Floor The Hop Exchange SE1 1TY
Rooms 27 To 29 The Hop Exchange SE1 1TY
Fourth Floor 5-7 Southwark Street SE1 1RQ
Fifth Floor 5-7 Southwark Street SE1 1RQ
Rooms 40 To 41 The Hop Exchange SE1 1TY
Rooms 42 To 44 The Hop Exchange SE1 1TY
Room 48 The Hop Exchange SE1 1TY
Rooms 30 To 33 The Hop Exchange SE1 1TY
Rooms 56 To 59 The Hop Exchange SE1 1TY
Third Floor And Fourth Floor The Hop Exchange SE1 1TY
First Floor Crowne House SE1 1UN
Third Floor Crowne House SE1 1UN
Fourth Floor Crowne House SE1 1UN
Basement Crowne House SE1 1UN
Ground Floor Crowne House SE1 1UN
Fifth Floor Front 61 Southwark Street SE1 0HR
Fifth Floor Rear 61 Southwark Street SE1 0HL
Part Sixth Floor 61 Southwark Street SE1 0HR
Fifth Floor Crowne House SE1 1UN
First Floor Front 61 Southwark Street SE1 0HL
Fourth Floor Front 61 Southwark Street SE1 0HR
Fourth Floor Pentagon House SE1 1UN
Fourth Floor Right Thrale House SE1 1UN
First Floor Right Thrale House SE1 1UN
Basement To First Floors 49 Southwark Street SE1 1RU
Third Floor Left Thrale House SE1 1UN
Third Floor Right Thrale House SE1 1UN
Fourth Floor Left Thrale House SE1 1UN
Basement Pentagon House SE1 1UN
Second Floor Pentagon House SE1 1UN
Third Floor Pentagon House SE1 1UN
Second Floor 49 Southwark Street SE1 1RU
Third Floor 49 Southwark Street SE1 1RU
Flat F 37 Southwark Bridge Road SE1 9HH
7a Park Street London SE1 9AB
7b Park Street London SE1 9AB
Second Floor Left Thames House SE1 9EQ
Block A Flat 4 Peabody Estate SE1 0TW
Block C Flat 8 Peabody Estate SE1 0TR
Block F Flat 12 Peabody Estate SE1 0TQ
Block F Flat 13 Peabody Estate SE1 0TQ
Block F Flat 14 Peabody Estate SE1 0TQ
Block F Flat 9 Peabody Estate SE1 0TQ
Block F Flat 10 Peabody Estate SE1 0TQ
Block F Flat 11 Peabody Estate SE1 0TQ
Block C Flat 5 Peabody Estate SE1 0TR
Block C Flat 6 Peabody Estate SE1 0TR
Block C Flat 7 Peabody Estate SE1 0TR
Block C Flat 2 Peabody Estate SE1 0TR
Block C Flat 3 Peabody Estate SE1 0TR
Block C Flat 4 Peabody Estate SE1 0TR
Block K Flat 13 Peabody Estate SE1 0TN
Block H Flat 9 Peabody Estate SE1 0TJ
Block H Flat 10 Peabody Estate SE1 0TJ
Block H Flat 11 Peabody Estate SE1 0TJ
Block H Flat 6 Peabody Estate SE1 0TJ
Block H Flat 7 Peabody Estate SE1 0TJ
Block H Flat 8 Peabody Estate SE1 0TJ
Block H Flat 15 Peabody Estate SE1 0TJ
Block H Flat 16 Peabody Estate SE1 0TJ
Block H Flat 17 Peabody Estate SE1 0TJ
Block H Flat 12 Peabody Estate SE1 0TJ
Block H Flat 13 Peabody Estate SE1 0TJ
Block H Flat 14 Peabody Estate SE1 0TJ
Block H Flat 5 Peabody Estate SE1 0TJ
Block G Flat 9 Peabody Estate SE1 0TH
Block G Flat 10 Peabody Estate SE1 0TH
Block G Flat 11 Peabody Estate SE1 0TH
Block G Flat 6 Peabody Estate SE1 0TH
Block G Flat 7 Peabody Estate SE1 0TH
Block G Flat 8 Peabody Estate SE1 0TH
Block H Flat 2 Peabody Estate SE1 0TJ
Block H Flat 3 Peabody Estate SE1 0TJ
Block H Flat 4 Peabody Estate SE1 0TJ
Block G Flat 12 Peabody Estate SE1 0TH
Block G Flat 13 Peabody Estate SE1 0TH
Block G Flat 14 Peabody Estate SE1 0TH
Block K Flat 4 Peabody Estate SE1 0TN
Block K Flat 5 Peabody Estate SE1 0TN
Block K Flat 6 Peabody Estate SE1 0TN
Block I Flat 14 Peabody Estate SE1 0TL
Block K Flat 2 Peabody Estate SE1 0TN
Block K Flat 3 Peabody Estate SE1 0TN
Block K Flat 10 Peabody Estate SE1 0TN
Block K Flat 11 Peabody Estate SE1 0TN
Block K Flat 12 Peabody Estate SE1 0TN
Block K Flat 7 Peabody Estate SE1 0TN
Block K Flat 8 Peabody Estate SE1 0TN
Block K Flat 9 Peabody Estate SE1 0TN
Block I Flat 13 Peabody Estate SE1 0TL
Block I Flat 4 Peabody Estate SE1 0TL
Block I Flat 5 Peabody Estate SE1 0TL
Block I Flat 6 Peabody Estate SE1 0TL
Block H Flat 18 Peabody Estate SE1 0TJ
Block I Flat 2 Peabody Estate SE1 0TL
Block I Flat 3 Peabody Estate SE1 0TL
Block I Flat 10 Peabody Estate SE1 0TL
Block I Flat 11 Peabody Estate SE1 0TL
Block I Flat 12 Peabody Estate SE1 0TL
Block I Flat 7 Peabody Estate SE1 0TL
Block I Flat 8 Peabody Estate SE1 0TL
Block I Flat 9 Peabody Estate SE1 0TL
Block A Flat 8 Peabody Estate SE1 0TW
Ground Floor Pentagon House SE1 1UR
11 Ayres Street London SE1 1ES
13 Ayres Street London SE1 1ES
84-86 Borough High Street London SE1 1LN
54 Borough High Street London SE1 1XL
21 Ayres Street London SE1 1ES
23 Ayres Street London SE1 1ES
25 Ayres Street London SE1 1ES
15 Ayres Street London SE1 1ES
17 Ayres Street London SE1 1ES
19 Ayres Street London SE1 1ES
92 Borough High Street London SE1 1LL
Fifty Nine And A Half Southwark Street SE1 0AL

2 Park Street London SE1 9AB
6-8 Park Street London SE1 9AB
4 Stoney Street London SE1 9AA
Jade House 3 Park Street SE1 9AB
8 Stoney Street London SE1 9AA
105 Sumner Street London SE1 9HZ
11 Park Street London SE1 9AB
35 Maiden Lane London SE1 9HG
4a Redcross Way London SE1 9HR
4b Redcross Way London SE1 9HR
2a Redcross Way London SE1 9HR
7 Park Street London SE1 9AB
4a Park Street London SE1 9AB
15 Park Street London SE1 9AB
First Floor Wigglesworth House SE1 9HH
Flat 12 Old Theatre Court SE1 9ES
Flat 13 Old Theatre Court SE1 9ES
Flat 15 Old Theatre Court SE1 9ES
Flat 9 Old Theatre Court SE1 9ES
Flat 10 Old Theatre Court SE1 9ES
Flat 11 Old Theatre Court SE1 9ES
Flat 19 Old Theatre Court SE1 9ES
Flat 20 Old Theatre Court SE1 9ES
Flat 21 Old Theatre Court SE1 9ES
Flat 16 Old Theatre Court SE1 9ES
Flat 17 Old Theatre Court SE1 9ES
Flat 18 Old Theatre Court SE1 9ES
Flat 8 Old Theatre Court SE1 9ES
12-14 Park Street London SE1 9AB
52 Thrale Street London SE1 9HW
9 Stoney Street London SE1 9AA
10 Park Street London SE1 9AB
Flat 6 Anchor Terrace SE1 9HQ
Flat 5 Old Theatre Court SE1 9ES
Flat 6 Old Theatre Court SE1 9ES
Flat 7 Old Theatre Court SE1 9ES
Flat 1 Old Theatre Court SE1 9ES
Flat 2 Old Theatre Court SE1 9ES
Flat 3 Old Theatre Court SE1 9ES
2b Redcross Way London SE1 9HR
32 Maiden Lane London SE1 9HG
34 Maiden Lane London SE1 9HG
37 Park Street London SE1 9EA
26 Maiden Lane London SE1 9HG
28 Maiden Lane London SE1 9HG
30 Maiden Lane London SE1 9HG
45 Park Street London SE1 9EA
47 Park Street London SE1 9EA
49 Park Street London SE1 9EA
39 Park Street London SE1 9EA
41 Park Street London SE1 9EA
43 Park Street London SE1 9EA
24 Maiden Lane London SE1 9HG
6 Maiden Lane London SE1 9HG
8 Maiden Lane London SE1 9HG
10 Maiden Lane London SE1 9HG
19 Porter Street London SE1 9HD
2 Maiden Lane London SE1 9HG
4 Maiden Lane London SE1 9HG
18 Maiden Lane London SE1 9HG
20 Maiden Lane London SE1 9HG
22 Maiden Lane London SE1 9HG
12 Maiden Lane London SE1 9HG
14 Maiden Lane London SE1 9HG
16 Maiden Lane London SE1 9HG
83 Park Street London SE1 9EA
85 Park Street London SE1 9EA
89 Park Street London SE1 9EA
77 Park Street London SE1 9EA
79 Park Street London SE1 9EA
81 Park Street London SE1 9EA
97 Park Street London SE1 9EA
99 Park Street London SE1 9EA
31 Park Street London SE1 9EA
91 Park Street London SE1 9EA
93 Park Street London SE1 9EA
95 Park Street London SE1 9EA
75 Park Street London SE1 9EA
57 Park Street London SE1 9EA
Unit 322 Great Guildford Business Square SE1 0HS
Flat 5 Henley Apartments SE1 0FA
Flat 6 Henley Apartments SE1 0FA
Flat 7 Henley Apartments SE1 0FA
54 Ayres Street London SE1 1EU
27-29 Union Street London SE1 1SD
Flat 16 Pattison House Marshalsea Estate SE1 1EY
Flat 17 Pattison House Marshalsea Estate SE1 1EY
Flat 18 Pattison House Marshalsea Estate SE1 1EY
Flat 13 Pattison House Marshalsea Estate SE1 1EY
Flat 14 Pattison House Marshalsea Estate SE1 1EY
Flat 15 Pattison House Marshalsea Estate SE1 1EY
Flat 21 Pattison House Marshalsea Estate SE1 1EY
Flat 22 Pattison House Marshalsea Estate SE1 1EY
Flat 23 Pattison House Marshalsea Estate SE1 1EY
Flat 19 Pattison House Marshalsea Estate SE1 1EY
Flat 2 Pattison House Marshalsea Estate SE1 1EY
Flat 20 Pattison House Marshalsea Estate SE1 1EY
Flat 12 Pattison House Marshalsea Estate SE1 1EY
Flat 1 79-81 Union Street SE1 1SG
Flat 2 79-81 Union Street SE1 1SG
2 Union Street London SE1 1SZ
27 Ayres Street London SE1 1ES
29 Ayres Street London SE1 1ES
Flat 1 Pattison House Marshalsea Estate SE1 1EY
Flat 10 Pattison House Marshalsea Estate SE1 1EY
Flat 11 Pattison House Marshalsea Estate SE1 1EY
22 Redcross Way London SE1 1TA
Flat Above 62 Union Street SE1 1TD
32 Southwark Street London SE1 1TU
Flat 4 Henley Apartments SE1 0FA
47 Great Guildford Street London SE1 0ES
78 Southwark Bridge Road London SE1 0AS
Unit 204 Great Guildford Business Square SE1 0HS
Unit 228 Great Guildford Business Square SE1 0HS
Unit 216 Great Guildford Business Square SE1 0HS
Unit 208 Great Guildford Business Square SE1 0HS
Block A Flat 12 Peabody Estate SE1 0TW
Block A Flat 13 Peabody Estate SE1 0TW
Block A Flat 14 Peabody Estate SE1 0TW
Block A Flat 9 Peabody Estate SE1 0TW
Block A Flat 10 Peabody Estate SE1 0TW
Block A Flat 11 Peabody Estate SE1 0TW
70-72 Union Street London SE1 0NW
90-96 Union Street London SE1 0NW
16 Great Guildford Street London SE1 0HS
91-95 Southwark Bridge Road London SE1 0AX
2 Ciba Apartments 101 Union Street SE1 0LQ
3 Ciba Apartments 101 Union Street SE1 0LQ
4 Ciba Apartments 101 Union Street SE1 0LQ
Unit 323 Great Guildford Business Square SE1 0HS
Unit 128 Great Guildford Business Square SE1 0HS
1 Ciba Apartments 101 Union Street SE1 0LQ
Flat 1 Henley Apartments SE1 0FA
Flat 2 Henley Apartments SE1 0FA
Flat 3 Henley Apartments SE1 0FA
5 Ciba Apartments 101 Union Street SE1 0LQ
6 Ciba Apartments 101 Union Street SE1 0LQ
7 Ciba Apartments 101 Union Street SE1 0LQ
Unit 232 Great Guildford Business Square SE1 0HS
Unit 229 Great Guildford Business Square SE1 0HS
The Harlequin Building 65 Southwark Street SE1 0HR
56 Southwark Bridge Road London SE1 0AS
Unit 317 Great Guildford Business Square SE1 0HS
Unit 129 Great Guildford Business Square SE1 0HS
Unit 230 Great Guildford Business Square SE1 0HS
52 Southwark Bridge Road London SE1 0AR
Unit 320 Great Guildford Business Square SE1 0HS
4-6 America Street London SE1 0NJ
Block G Flat 5 Peabody Estate SE1 0TH
11a Southwark Street London SE1 1RQ
Flat 1 70-72 Union Street SE1 1TD
Flat 2 70-72 Union Street SE1 1TD
Apartment 6 11 Southwark Street SE1 1RQ
Apartment 7 11 Southwark Street SE1 1RQ
Apartment 8 11 Southwark Street SE1 1RQ
Fourth Floor The Harlequin Building SE1 0HR
Fifth And Sixth Floor The Harlequin Building SE1 0HR
Basement The Harlequin Building SE1 0HR

59 Park Street London SE1 9EA
61 Park Street London SE1 9EA
51 Park Street London SE1 9EA
53 Park Street London SE1 9EA
55 Park Street London SE1 9EA
69 Park Street London SE1 9EA
71 Park Street London SE1 9EA
73 Park Street London SE1 9EA
63 Park Street London SE1 9EA
65 Park Street London SE1 9EA
67 Park Street London SE1 9EA
Flat 22 Old Theatre Court SE1 9ES
38-48 Southwark Bridge Road London SE1 9EJ
22 Southwark Bridge Road London SE1 9HB
Fourth Floor Wigglesworth House SE1 9HH
Merchant House 14-16 Stoney Street SE1 9AD
18 New Globe Walk London SE1 9DR
Wykeham House 123 Union Street SE1 0LG
1a Park Street London SE1 9AB
11b Stoney Street London SE1 9AD
Flat 17 21 Great Guildford Street SE1 9EP
Flat 8 21 Great Guildford Street SE1 9EP
Flat 9 21 Great Guildford Street SE1 9EP
Flat 10 21 Great Guildford Street SE1 9EP
Flat 5 21 Great Guildford Street SE1 9EP
Flat 6 21 Great Guildford Street SE1 9EP
Flat 7 21 Great Guildford Street SE1 9EP
Flat 14 21 Great Guildford Street SE1 9EP
Flat 15 21 Great Guildford Street SE1 9EP
Flat 16 21 Great Guildford Street SE1 9EP
Flat 11 21 Great Guildford Street SE1 9EP
Flat 12 21 Great Guildford Street SE1 9EP
Flat 13 21 Great Guildford Street SE1 9EP
Second Floor And Third Floor And Mansard Floor Flat 55
Southwark Street SE1 1RU
Studio Flat 43 Great Guildford Street SE1 0ES
Unit 4 The Ragged School SE1 1SG
Ground Floor And First Floor Flat 66 Southwark Bridge Road
SE1 0AS
First Floor And Second Floor Flat 12 Stoney Street SE1 9AD
Second Floor Flat 56 Ayres Street SE1 1EU
Flat C 37 Southwark Bridge Road SE1 9HH
Flat D 37 Southwark Bridge Road SE1 9HH
Flat E 37 Southwark Bridge Road SE1 9HH
2 Calverts Building 52 Borough High Street SE1 1XN
Flat A 37 Southwark Bridge Road SE1 9HH
Flat B 37 Southwark Bridge Road SE1 9HH
First To Third Floor Flat 66 Southwark Bridge Road SE1 0AS
First Floor Flat 75 Union Street SE1 1SG
First Floor Flat 60 Southwark Bridge Road SE1 0AS
First Floor Flat 31 Union Street SE1 1SD
Rose And Crown 65-67 Union Street SE1 1SG
8 Park Street London SE1 9AB
First Floor And Second Floor Flat 54 Thrale Street SE1 9HW
Apartment 3 1 Playhouse Court SE1 0AS
Flat 4 41 Great Guildford Street SE1 0ES
First Floor And Second Floor Flat 3 Park Street SE1 9AB
First To Third Floors 5 Park Street SE1 9AB
Apartment 1 1 Playhouse Court SE1 0AS
Apartment 2 1 Playhouse Court SE1 0AS
Flat 4 21 Great Guildford Street SE1 9EP
Flat 51 Old Theatre Court SE1 9ES
Flat 52 Old Theatre Court SE1 9ES
Flat 53 Old Theatre Court SE1 9ES
Flat 38 Old Theatre Court SE1 9ES
Flat 39 Old Theatre Court SE1 9ES
Flat 50 Old Theatre Court SE1 9ES
4 Anchor Terrace 125 Park Street SE1 9EW
5 Anchor Terrace 125 Park Street SE1 9EW
Flat 7 Anchor Terrace SE1 9HQ
1 Anchor Terrace 125 Park Street SE1 9EW
2 Anchor Terrace 125 Park Street SE1 9EW
3 Anchor Terrace 125 Park Street SE1 9EW
Flat 37 Old Theatre Court SE1 9ES
Flat 27 Old Theatre Court SE1 9ES
Flat 28 Old Theatre Court SE1 9ES
Flat 29 Old Theatre Court SE1 9ES
Flat 23 Old Theatre Court SE1 9ES
Flat 25 Old Theatre Court SE1 9ES
Unit 101-119 16-48 Great Guildford Street SE1 0ES
First Floor The Harlequin Building SE1 0HR
Second And Third The Harlequin Building SE1 0HR
Apartment 5 11 Southwark Street SE1 1RQ
Railway Arch 29 To 31 Omeara Street SE1 1TE
Third Floor 8 Playhouse Court SE1 0AT
Room 2 Tulip House SE1 1XF
Basement To First Floor 58 Borough High Street SE1 1XF
Second To Third Floor 58 Borough High Street SE1 1XF
Apartment 2 11 Southwark Street SE1 1RQ
Apartment 3 11 Southwark Street SE1 1RQ
Apartment 4 11 Southwark Street SE1 1RQ
Third Floor 38-40 Southwark Street SE1 1UN
11 Southwark Street London SE1 1RQ
Apartment 1 11 Southwark Street SE1 1RQ
80 Southwark Bridge Road London SE1 0AS
45 Great Guildford Street London SE1 0ES
72 Southwark Bridge Road London SE1 0AS
74 Southwark Bridge Road London SE1 0AS
76 Southwark Bridge Road London SE1 0AS
70 Southwark Bridge Road London SE1 0AS
Unit 1 Great Guildford Business Square SE1 0HS
To Many Cooks Great Guildford Business Square SE1 0HS
Ground Floor The Harlequin Building SE1 0HR
Garage Ground Floor 52 Southwark Bridge Road SE1 0AR
Unit 209 To 211 16-48 Great Guildford Street SE1 0HS
54 Southwark Bridge Road London SE1 0AR
68 Southwark Bridge Road London SE1 0AS
Crane Building 22 Lavington Street SE1 0NZ
Room 1 Basement Tulip House SE1 1XF
Flat 7 92 Borough High Street SE1 1LL
Flat 8 92 Borough High Street SE1 1LL
94 Borough High Street SE1 1LL
Flat 4 92 Borough High Street SE1 1LL
Flat 5 92 Borough High Street SE1 1LL
Flat 6 92 Borough High Street SE1 1LL
Unit 207 To 211 Great Guildford Business Square SE1 0HS
Third Floor 60 Borough High Street SE1 1XF
First And Second Floor 60 Borough High Street SE1 1XF
First Floor 30 Park Street SE1 9EQ
Second Floor 30 Park Street SE1 9EQ
First Floor Left Maidstone Buildings Mews 1b SE1 1GD
Flat 3 92 Borough High Street SE1 1LL
Flat 1 92 Borough High Street SE1 1LL
Flat 2 92 Borough High Street SE1 1LL
Unit 211 16-48 Great Guildford Street SE1 0HS
Unit 212 16-48 Great Guildford Street SE1 0HS
First Floor Beckett House SE1 1XF
Ninth Floor Bankside 3 90-100 Southwark Street SE1 0SW
Ground Floor Left Hand Side The Harlequin Building SE1 0HR
Flat 4 64 Southwark Bridge Road SE1 0AS
Ground Floor Left 30 Park Street SE1 9EQ
Second Floor 1 St Margarets Court SE1 1XF
Third Floor 1 St Margarets Court SE1 1XF
Ground Floor South 91-95 Southwark Bridge Road SE1 0AX
Flat 3 70-72 Union Street SE1 0NW
Flat 4 70-72 Union Street SE1 0NW
Flat 5 70-72 Union Street SE1 0NW
Ground Floor 81 Southwark Bridge Road SE1 0NQ
Unit 1 70-72 Union Street SE1 0NW
Unit 2 70-72 Union Street SE1 0NW
Third Floor 91-95 Southwark Bridge Road SE1 0AX
Flat 6 70-72 Union Street SE1 0NW
First Floor 81 Southwark Bridge Road SE1 0NQ
Third To Fifth Floor 81 Southwark Bridge Road SE1 0NQ
Unit 215 Great Guildford Business Square SE1 0HS
Unit 224 Great Guildford Business Square SE1 0HS
Unit 225 Great Guildford Business Square SE1 0HS
85a Southwark Bridge Road London SE1 0NQ
Unit 214 Great Guildford Business Square SE1 0HS
Block H Flat 1 Peabody Estate SE1 0TJ
Block I Flat 1 Peabody Estate SE1 0TL
Block K Flat 1 Peabody Estate SE1 0TN
Unit 309 Great Guildford Business Square SE1 0HS
Unit 310 Great Guildford Business Square SE1 0HS
Block G Flat 1 Peabody Estate SE1 0TH
Block E Flat 13 Peabody Estate SE1 0TG

Flat 26 Old Theatre Court SE1 9ES
Flat 33 Old Theatre Court SE1 9ES
Flat 35 Old Theatre Court SE1 9ES
Flat 36 Old Theatre Court SE1 9ES
Flat 30 Old Theatre Court SE1 9ES
Flat 31 Old Theatre Court SE1 9ES
Flat 32 Old Theatre Court SE1 9ES
Flat 24 Anchor Terrace SE1 9HQ
Flat 25 Anchor Terrace SE1 9HQ
Flat 26 Anchor Terrace SE1 9HQ
Flat 21 Anchor Terrace SE1 9HQ
Flat 22 Anchor Terrace SE1 9HQ
Flat 23 Anchor Terrace SE1 9HQ
Flat 1 21 Great Guildford Street SE1 9EP
Flat 2 21 Great Guildford Street SE1 9EP
Flat 3 21 Great Guildford Street SE1 9EP
Flat 27 Anchor Terrace SE1 9HQ
Flat 28 Anchor Terrace SE1 9HQ
Flat 29 Anchor Terrace SE1 9HQ
Flat 20 Anchor Terrace SE1 9HQ
Flat 11 Anchor Terrace SE1 9HQ
Flat 12 Anchor Terrace SE1 9HQ
Flat 13 Anchor Terrace SE1 9HQ
Flat 8 Anchor Terrace SE1 9HQ
Flat 9 Anchor Terrace SE1 9HQ
Flat 10 Anchor Terrace SE1 9HQ
Flat 17 Anchor Terrace SE1 9HQ
Flat 18 Anchor Terrace SE1 9HQ
Flat 19 Anchor Terrace SE1 9HQ
Flat 14 Anchor Terrace SE1 9HQ
Flat 15 Anchor Terrace SE1 9HQ
Flat 16 Anchor Terrace SE1 9HQ
First Floor 72-76 Borough High Street SE1 1XF
Peer Group Part Lower Ground Floor The Hop Exchange SE1 1TY
Part Basement Crowne House SE1 1UN
1-2 Rochester Walk London SE1 9AF
Basement And Ground Floor 50 Southwark Bridge Road SE1 0AR
First Floor Flat 6 Union Street SE1 1SZ
Part Third Floor North Rosemount Thames House SE1 9EL
Third Floor South Thames Thames House SE1 9EL
Fourth Floor South Thames House SE1 9EL
Fourth Floor North Thames House SE1 9EL

Block E Flat 14 Peabody Estate SE1 0TG
Block E Flat 15 Peabody Estate SE1 0TG
Block E Flat 10 Peabody Estate SE1 0TG
Block E Flat 11 Peabody Estate SE1 0TG
Block E Flat 12 Peabody Estate SE1 0TG
Block G Flat 2 Peabody Estate SE1 0TH
Block G Flat 3 Peabody Estate SE1 0TH
Block G Flat 4 Peabody Estate SE1 0TH
Block E Flat 16 Peabody Estate SE1 0TG
Block E Flat 17 Peabody Estate SE1 0TG
Block E Flat 18 Peabody Estate SE1 0TG
Block E Flat 9 Peabody Estate SE1 0TG
Block A Flat 1 Peabody Estate SE1 0TW
Block E Flat 1 Peabody Estate SE1 0TG
Block E Flat 2 Peabody Estate SE1 0TG
Block B Flat 1 Peabody Estate SE1 0TP
Block F Flat 1 Peabody Estate SE1 0TQ
Block C Flat 1 Peabody Estate SE1 0TR
Block E Flat 6 Peabody Estate SE1 0TG
Block E Flat 7 Peabody Estate SE1 0TG
Block E Flat 8 Peabody Estate SE1 0TG
Block E Flat 3 Peabody Estate SE1 0TG
Block E Flat 4 Peabody Estate SE1 0TG
Block E Flat 5 Peabody Estate SE1 0TG
1-2 Doyce Street London SE1 0EU
Flat 2, 31 Union Street London SE1 1SD
Flat 1, 28 Clennam Street London SE1 1ER
10 Overy House London SE18QX
10 Overy House London SE1 8QX
57a Lant Street Southwark SE1 1QN
The Russia House Ltd Chapel Court SE1 1HH
17 Tabard Street London SE1 4LA
Flat 1, 28 Clennam Street London SE1 1ER
61 Albert Barnes House New Kent Road SE1 6PJ
Flat 2 26 Marshalsea Road SE1 1HF
Flat 6 Hatters Court 99 Redcross Way SE1 1EB
Flat6 14 Weller Street Se1 1qu
Flat 2, 26 Marshalsea Road Borough SE1 1HF
8 Thorold House Pepper Street SE1 0EL
47 Union Street London se11sg
47 Burnham Estate Burnham Street E2 0jf
By E-Form
Triangle Court 10 Redcorss Way SE1

Re-consultation: n/a

Consultation responses received

Internal services

Flood and Drainage Team

- The Flood Risk Assessment (FRA) states that the basement finished floor level is 5.80m below ground level, and that BGS boreholes state that the groundwater is 2.8m below ground level. It is not clear from the FRA what effects the introduction of the basement will have on groundwater levels in the surrounding area and whether it is possible that flooding would be caused. No information is provided regarding any groundwater flows through and around the site.
- No details are provided of the current runoff rate, or the proposed runoff rate for the site. This information is required to determine whether the proposed surface water management measures are suitable.
- No drainage strategy is currently provided, but would be happy to deal with this via condition, along the lines of those used previously.

In order to approve this application, it is expected the first two points above to be addressed.

Statutory and non-statutory organisations

Environment Agency

No objections in principle, but have made comments and suggestions on some aspects of the scheme:

- consideration of other sources of flooding may be necessary to inform suitable mitigation measures to reduce the impact of any such flooding.
- some of the flooding information referred to within the submitted FRA has been superseded.
- expect to review an up-to-date FRA for any planning application. However, on this occasion, the EA are adopting a pragmatic approach by not objecting to this planning application, as the production of an updated FRA would not materially alter our stance on the proposed development. Nevertheless, the EA do not want to set a precedent for any future proposals that such an FRA is appropriate. Moreover, the Local Planning Authority may require, and thus request, an updated FRA in order to inform their decisions on the development.
- Strongly recommend that the finished floor levels are raised to levels to an updated modelled 1 in 200 year flood level, if at all possible.
- prefer that lower ground floor (basement) levels are not incorporated within developments within areas at risk of flooding.
- recommend that flood resistant and resilient measures are incorporated in to the design and construction of the development proposals.

Greater London Authority

At the time of writing, the GLA has not provided their Stage 1 report. It is anticipated that a combined Stage 1 and 2 report would be issued after the date of the Planning Committee meeting.

Historic England

Objects to the scheme. The information provided with the application is wholly inadequate to assess the potentially significant impacts of these proposals on

designated and undesignated heritage assets. The proposed design of the development neither reflects or respects the established character of the conservation area and would cause unjustified and substantial harm to the historic environment.

The site does not appear to be identified in LB Southwark's own policies as a suitable site for a tall building. The small scale sketches and associated table provided within the Design and Access Statement are insufficient to assess the potential impact of a tall building and associated development on the immediate and wider historic environment. Given the significance of the heritage assets identified above, the potential impact of a tall building in this area and the absence of any convincing justification or analysis, including visually verified images, Historic England can only conclude that the harm would be substantial.

The proposed development does not reflect the established character and appearance of the area, as it is oversized and visually very dominant. The building fronting onto Southwark Street is oversized in the street, with a confused elevational treatment. The main frontage is largely solid on its lower floors and clad with precast concrete described in the application as 'imitation stone'. It is punctuated by doors and windows which have a random appearance on the elevation which do little to resolve its solid appearance or relationship with the street. The upper four floors are comprised of a series of large triangular 'feature' stained glass windows. It appears bulky and visually dwarfs the lower floors of the building and the neighbouring listed buildings. Together the height, scale, massing, forms and materials of this elevation compete visually and would appear incongruous in the context of the surrounding Victorian buildings with their clearly expressed rhythm, solid to void ratios and fine detailing.

In the absence of representational material of an appropriate scope, quality, clarity and detail accompanying information, Historic England wishes to reserve their position to provide detailed comments on the design of the proposed tall building until such information has been made available.

Historic England urges the LPA to refuse the application.

London Fire & Emergency Planning Authority

No specific planning comments on this application have been made.

London Underground Limited

Though there is no objection in principle to the planning application there are a number of potential constraints on the redevelopment of a site situated close to underground tunnels and infrastructure and recommends a condition to ensure that the development will not have any detrimental effect on the tunnels and structures either in the short or long term.

Network Rail (Planning)

No objections made, but general comments have been provided in relation to the safety and any potential damage to NR's infrastructure. NR highlights that the developer must ensure that their proposal, both during construction and after completion of works on site, does not encroach onto Network Rail land or affect the safety, operation or integrity of the company's railway and its infrastructure.

With regards to the design of the development, NR states that the developer must ensure that there will be no glare from the glazing that could affect the sighting of train drivers, in particular to see any signals. This may require a specific type of glazing or a 'signal sighting' exercise to be undertaken.

Basement – The construction of the basement should be such that there is no detrimental effect on the railway viaduct foundations. This should be considered in the design and construction. It is most likely that a Party Wall Agreement will be required. Network Rail will be required to maintain and access their viaduct and arches. As such, any development should leave a minimum of 2 meter clearance from the viaduct.

Metropolitan Police Service (Designing out Crime)

The size and importance of this building really should have measures put in place to prevent anti-social behaviour crime and criminality and would therefore seek for a condition to be entered into the decision that this development must achieve Secured by design accreditation for the residential and commercial.

Conservation Area Advisory Group (CAAG)

This scheme was presented to Southwark's CAAG in July. The minutes of their meeting record an objection to this scheme and note the following specific concerns:

It was noted that this scheme was located on the site of the former Southwark Square which existed prior to the coming of the railway: however investigations to date have not indicated that it is a site of archaeological importance.

The panel was appalled by the insensitivity of the applicant's proposals for this prominent site located on Southwark Street, adjoining an important listed building, within the Thrale Road CA. and adjoining the Union Street CA, from which the proposed development will also be very visible.

The panel's view of the applicant's proposals included the following observations:

- The building fails to meet the basic criteria required when building next to an important listed building: that it has to complement and enhance its setting, not demean it, as this proposal clearly does.
- The site lies immediately adjacent to one of the area's finest listed buildings, the Victorian former Menier Chocolate factory, but the proposed new building pays no regard to it, crudely crashes into it and obscures an important part of it. Any adjoining building on this site should be respectfully separate from it.
- The applicant's scheme shows no appreciation of the history, architecture and character of Southwark Street and is alien to the architecture of London
- The scheme is frankly coarse, comic and preposterous.
- It will impact totally unacceptably on the conservation area that it is sited in and on the adjoining, small scale, Union St CA and listed buildings nearby.
- The tower is wholly inappropriate in character and scale and lies outside the area designated for high buildings in the London and Southwark plans.
- The site stops short of the railway viaduct but uses land outside the site curtilage to service it. However, this area is designated in the Southwark plan as a pedestrian route-way, (the "Low-Line") between London Bridge and Waterloo along the line of the viaduct.
- The ground planning concentrates it's servicing at the rear of the building, thus turning it's back on the proposed "Low-Line" scheme for a pedestrian route. Active frontages should be provided to both north and south frontages of the building, (i.e. to Southwark Street and to the "Low-Line" route-way.)
- The proposed nine residential units planned within this huge scheme appear to be a blatant attempt to circumvent the council's requirement for the social housing element that is required in larger residential housing schemes.
- The panel urged that planning consent be refused on all these grounds.

Neighbours and local groups

Better Bankside

Concerned with the lack of detail on cycle parking provision and strongly recommend that the proposed provision goes beyond the current London Plan Standards for all use classes; As well as looking at how the development could share waste facilities with the adjoining Menier Chocolate Factory, Better Bankside would welcome efforts to see how this development could help consolidate waste from other nearby businesses, particularly those located on Flat Iron Square; recommendations on the construction logistics of the development and how it could be co-ordinated with the developments nearby; There is very little detail in the Design and Access Statement about the design and materials used for the surrounding public realm. In addition, it would be useful to understand how the proposed development will interface with the emerging Low Line route at the rear of the site, which promotes greater footfall and pedestrian access along the viaduct. It will also be useful to understand the proposed detailed design for access to Flat Iron Square for pedestrians via Arch 33; welcome the measures being proposed in the planning application and suggest that there is further scope for greater water management and efficiency on site – particularly in relation to the green roof and ground level landscaped areas; the bulk and heavy detailing of the proposed building does not add to the built quality of the area; this section of Southwark Street also lies outside the area identified by Southwark Council as suitable for tall buildings; commercial use, to be developed at the proposed sizes with floor plates of around 500sqm each are welcomed, as there is an evidenced need for offices of this size in the neighbourhood.

A total of 24 letters/emails have been received from neighbour consultation and they are summarised in the main report.