

# **AVONMOUTH HOUSE**

6 AVONMOUTH STREET, LONDON, SE1 6NX

AN APPEAL UNDER SECTION 78 OF THE TOWN AND COUNTRY PLANNING ACT 1990

**APPEAL REFERENCE: APP/A5840/W/22/3303205**

## **REBUTTAL PROOF OF EVIDENCE OF**

**Sally Lewis B.Arch MA-UD RIBA ARB**

on behalf of Tribe (Avonmouth House) Ltd

6 December 2022

## REBUTTAL PROOF OF EVIDENCE PREPARED BY SALLY LEWIS

- 0.1. This proof of evidence supplements my Main Proof and Summary Proof, both dated 16 November 2021. It responds to matters raised by Mr Richard Craig on behalf of the London Borough of Southwark ("LBS") in his Proof of Evidence. It should be read alongside Mr Coleman's rebuttal of Mr Craig's Proof of Evidence and Mr Hepher's rebuttal of Ms Zoe Brown's Proof of Evidence.
- 0.2. I wish to draw attention to the helpful description of the appeal scheme made by Mr Craig in his Proof in Para 3.5 where he recognises that ***"the architecture is devised into a series of layers, which is then further articulated by changes to the elevational planes, brickwork colours and detailed treatments of the facades. The ground and first floor are designed to read as a distinct base to the building, featuring corner recessed entrances and large window openings, with the base finished in dark red brickwork. Above the base, the massing is slightly articulated with the central four bays modestly stepped forward to break up the plane of the building's main elevation."*** In Para 3.6 he refers to ***"elevations detailed to introduce a variety of colours and finishes for the piers, spandrels and lintels"*** and how ***"two additional storeys are further profiled with extended brickwork piers to help visually express this element as the 'top'."*** These descriptions are positive and suggest approval of the architectural strategies employed.
- 0.3. At Para 3.16 Mr Craig questions whether the pre-application proposals received sufficient design scrutiny. Due to the lack of LBS officer engagement, the design team did not have the benefit of the Council's detailed feedback on the design proposals. It is only through the Council's SoC and Mr Craig's Proof (in Para 4.26 for example) that we have become aware of the Council's impression of the top of the building as being 'top-heavy' due to the ***"contrasting dark and solid appearance of the crown"*** which ***"brings it back into visual prominence"***.
- 0.4. Mr Craig also refers to the successful use of the paler brick palette of the 14 storey element in Para 4.26 where he describes how ***"The pale brickwork and glazing soften the building's appearance, which helps it to recede in view against the cloudy sky."*** These comments suggest that an alternative use of the brick palette, using the paler tones on the higher elements of the building, may have been well received by the council.
- 0.5. It is Stitch's practice to be responsive to design dialogue and repeatedly test design options in order to satisfactorily meet the aspirations of all stakeholders. As such we would have welcomed the opportunity to engage with Council officers in design discussions. While we are confident in the chosen application of brick colours within the appeal scheme palette, we would have been open to testing its employment, provided that the core design principles underpinning the scheme - a well-defined base, an articulated façade and well defined and distinctive 'crown' - were unaffected.
- 0.6. To demonstrate this point we have carried out a design test using the appeal scheme's palette of brick colours and maintaining the design features of the scheme, but adjusting the colour of the crown and its associated vertical component running down the park facing elevation of the building. The sketch views in Figure 01 illustrate a simple adjustment that removes the red brick on the crown and replaces it with paler bricks in the palette.
- 0.7. We remain confident in the architectural quality of the appeal scheme, with a defined base, an articulated façade and well defined and distinctive 'crown'. This design quality can be achieved equally successfully with the appeal scheme palette or an alternative as illustrated below in Figure 01. If the Inspector considers this to be necessary, we would be content to see the palette controlled by a planning condition requiring the detailed submission of materials, whereby the colour of the proposed bricks could plainly be the subject of further consideration and control by the Council.

*Figure 01 : Comparison views that retain the architectural design of the appeal scheme but use an alternative colour distribution employing the same material palette.*

## ELEVATION VIEW



Appeal scheme option



Grey brick option

## VIEW FROM NEWINGTON GARDENS



Appeal scheme option



Grey brick option

## VIEW FROM NEWINGTON CAUSEWAY



Appeal scheme option



Grey brick option

## VIEW ALONG TIVERTON STREET



Appeal scheme option



Grey brick option