

**AVONMOUTH HOUSE**

**6 Avonmouth Street, London, SE1 6NX**

**REBUTTAL PROOF OF EVIDENCE**  
**of Richard Coleman Dip Arch (Cant) ARB RIBA RIAI**  
**DESIGN AND TOWNSCAPE**

on behalf of Avonmouth House Limited

**Planning Inspectorate Reference: APP/A5840/W/22/3303205**

**LPA Reference: 21/AP/4297**

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## **1.0 INTRODUCTION**

- 1.1 This rebuttal proof of evidence has been prepared in response to a number of points in the evidence of Mr Richard Craig. In preparing this rebuttal I have not addressed every point made, but this does not mean that I am in agreement with any point by virtue of omission.
- 1.2 This rebuttal has been prepared on the same terms as my Proof of Evidence of 16<sup>th</sup> November 2022 and it remains that the opinions expressed are my true and professional opinions.

## **2.0 THE EVIDENCE OF MR CRAIG**

2.1 The following sets out my rebuttal comments on some of the points set out in Mr Craig's "Proof of Evidence" in which he comments on the appeal scheme design and on the HTVA (CD1.69). I have read Mr Craig's evidence and wish to comment on the following paragraphs within it.

2.2 I have respect for Mr. Craig, having known him from many years and having had the opportunity to debate and collaborate on a number of designs. Unfortunately in this case, Mr. Craig was not part of the planning team and the chance to collaborate on design matters didn't occur. This was also because the case officer was unwilling to enter into discussion about the potential for a refined height or the nature of form and materials. The Council's views on this have now become much clearer, with the recent resolution to grant planning permission for a building of substantially the same form as the appeal proposals, rising to 14 storeys.

### **3.0 RESPONSES (by reference to Mr. Craig's paragraphs)**

- 3.1 At 4.19 he says it's "difficult to appreciate the scale relationship with the tower and the Ceramic Building" - it is not, the appeal scheme from here is clearly very much smaller in scale both overall and in its parts.
- 3.2 Also at 4.19 he refers to "harsher appearance of the crown", at 4.21 and 4.26 to "crown reads as top heavy", at 4.23 "height afforded by the crown is unnecessary, unflattering and unwarranted", at 4.26 "intrudes on and diminishes the sense of place", and at 4.28 "catching the eye", "drawing attention", "erodes the sense of place". These claims appear to me to be assertion and not supported by detailed analysis or evidence.
- 3.3 At 4.22 it is not clear which view he is referring to or whether he means "left" instead of "right". But his claim that an "effective transition .. down to the local context", based on just one view, ignores the reality of the human urban experience being a continuous one through movement and memory not just a camera snapshot.
- 3.4 At 4.27, referring to View 2, he says the appeal scheme "looks remote", and "too tall to convey any sense of transition". Regarding "remote", perhaps in this one view but it is not when seen in the round. This claim sits awkwardly with the fact that officers have now recommended approval of an amended scheme without the crown which presumably does convey a transition? If one compares the two, their effect in this regard is virtually the same.

- 3.5 At 4.28, referring to View 3 and a further potential view with similar effect from Bath Terrace (see my appendix), the appearance of the building, because of its darker crown, is seen as intrusive, “eroding the sense of place”, but because the visibility of the equally dark Ceramic Building, among others, is “understood as part of the nearby town centre”, perhaps the claimed erosion of the sense of place is misplaced. This is not an equitable assessment. It is a fact that the appeal scheme is also visible from Bath Terrace, as Mr Craig presumes, and from Binnie House (see my appendix). But the space at Binnie House is not a public view as he states. From the public parts of the estate, other tall buildings are visible. Mr Craig seems to give the estate and the individual blocks a status which they do not have. They are not within a conservation area nor are they locally listed and have not been declared as non-designated heritage assets. Even if they were of such a status, the appearance in local views of back drop buildings is part of the normal layering of a growing city.
- 3.6 At 4.39 and 4.40 View 9 was taken to show that the main position from which the appeal scheme creates a backdrop to the listed Sessions Court is also a position from where appreciation of the building is generally unsatisfactory. Mr Craig refers to it as though it were a recognised qualitative view, which it is not. His assessment of a “dense” and “overwhelming backdrop” is an exaggeration. Contrary to his belief that impact will increase on entering the courtyard, it will in fact decrease in relation to the increased impact, on the viewer, of the Sessions Court (see my appendix). And his assertion that the appeal scheme would be visible in “head on” views from Newington Causeway, presumably of the court building, is incorrect (see my appendix). He states “unlikely to unduly

harm the significance” unjustifiably maintaining a position of some harm to significance without adequately justifying that claim one which has been dropped from the Council's Statement of Case in any event.

- 3.7 At 4.41 Mr Craig claims that the reduction in comparative heights, in View 10, is “underwhelming and unconvincing”. It is nevertheless apparent and in my view effective. The observer will know that the transition of heights is in fact greater than what is perceived by a camera from one static position, since they will be aware of the distance between the buildings through the parallax created by their movement and memory.
- 3.8 While the site could be described as backland development, it does in fact face onto Avonmouth Street. It is the whole building which forms the high buildings cluster transition, the articulation being a local contextual acknowledgement of the Rockingham estate. As for the role of way-finder, any prominent building with a memorable and distinctive architecture can act in this way.
- 3.9 At 4.45 he contradicts what he claims at 4.40 in regard to formal “head on” views by stating a “marginal” appreciation, maintaining some claim to harm. If this was so why has the Council withdrawn it as a reason for refusal on this basis?
- 3.10 At 4.48 Mr Craig says the appeal scheme vies for attention, but this is simply a product of normal townscape visibility. He says it diminishes the landmark quality of the Sessions Court but does not say how, particularly in views where that landmark quality is most fully appreciated ie head on.



3.11 At 4.49 and 4.50 he attempts to claim the appeal scheme is not subservient to the Ceramic Building which it plainly is. His basis for this claim is one static view from where it appears at the same height. If I stand near the 7 storey blue building at the edge of the Rockingham estate, the Ceramic building appears bigger than Eileen House, but it plainly isn't.

## **4.0 CONCLUSION**

- 4.1 Clearly I have a difference of opinion to Mr. Craig about the merits of the scheme. However, he has raised issues which have prompted two reactions; first, from myself, through the additional VU.City studies in the Appendix of this rebuttal document, and second, from Stitch Architects, who have illustrated in their rebuttal document an option to change the colour of bricks, a matter which would normally be a condition of any permission.
- 4.2 I maintain my belief that 16 storeys including a “crown” feature, is appropriate for this site and to truncate it is unnecessary and results in a less good piece of architecture.

## **APPENDIX I:** **ADDITIONAL VU.CITY VIEWS**

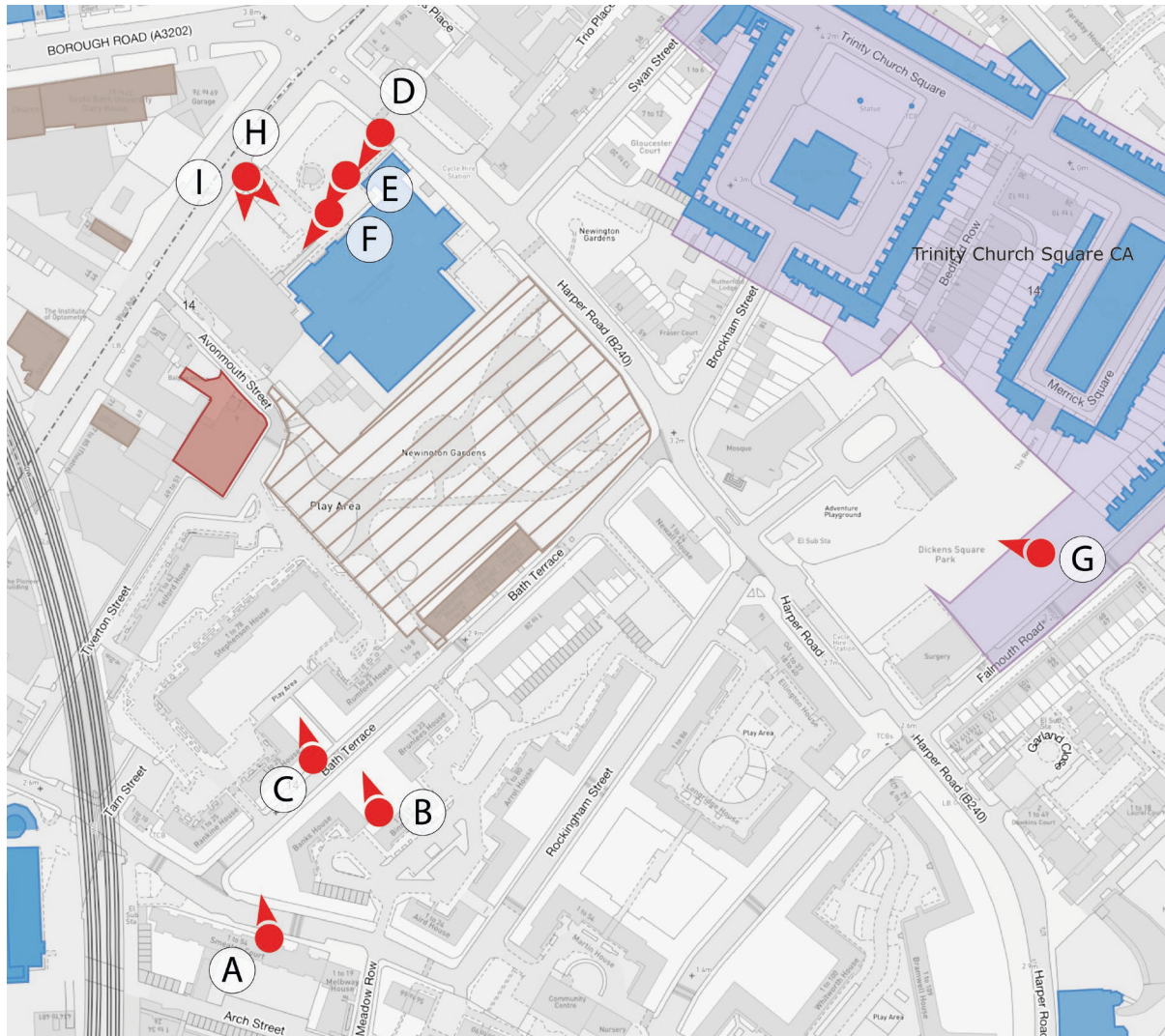


Figure 1: Map with additional views for Rebuttal



View A – Rockingham Street, looking north. The appeal scheme is marginally visible behind one of the chimneys.





View B –From Binnie House looking across a private garden in the southern courtyard, looking north where the appeal scheme is visible, just as the Ceramic building is.



View C – Bath Terrace looking across northern courtyard, looking north from where the appeal scheme is visible in just the same way as the Ceramic Building





View D – From the Harper Road, looking south-west across the Sessions Court yard. Although this is not the principal route to the Court, it illustrates a phenomenon which Mr. Craig refers to. As the viewer approaches, however, the appeal scheme reduces in apparent size in relation to and as the Sessions Court Building becomes larger in the view.





View E – Approaching the main entrance of the Sessions Court, looking south-west, the same phenomenon as D occurs.



View F – Next to entrance of Sessions Court, looking south-west, from where the appeal scheme has reduced in its apparent visibility in comparison with the much enlarged Sessions Court.



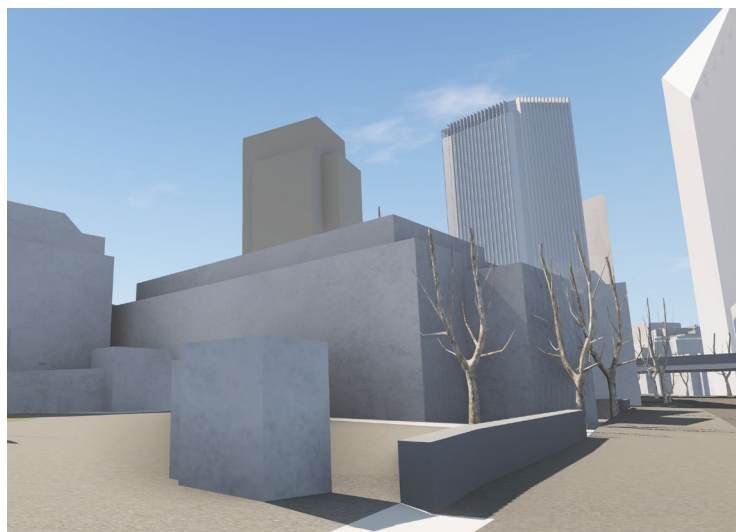


View G – Dickens Square Park, looking north-west from where the appeal scheme is theoretically visible but with a very thick treescape between. Thus illustrates why there are no long distance views.

View H – Head on view of Sessions  
Court, looking south-east



View I – Front of Sessions Court, looking south



The Camera turns right to include the appeal scheme, illustrating (i) its distinct separateness from the Listed Sessions Court and (ii) its strong relationship with the high building cluster.

**APPENDIX II:**  
**SELECTION OF SITE PHOTOGRAPHS**





View from Bath Terrace



View of Binnie House private garden





Cluster from Bath Terrace



Newington Gardens' dense winter treescape



HTVA Adjusted View no. 9



Interim approach to Court entrance





View across courtyard and showing court extension

## **APPENDIX III:**

### **MODEL VIEWS OF THE AREA**



