



**ANTHOLOGY
KENNINGTON STAGE**

Built from London

Rebuttal to Proof of Evidence Provided by Doug Black

November 2020

Rolfe Judd

Rebuttal to Proof of Evidence by Doug Black

- 1.1.1 In paragraph 2.4 of Doug Black's evidence provided on behalf of the London Borough of Lambeth, he states "*I have illustrated my proof with recent photographs of the site context and the most recent Google street view images. Where the Appellant has not provided an illustration of the proposal in these views, I have used my best judgement (based on maps, and the application plans and elevations) to illustrate the likely effect of the proposal on the view. It should be noted that these illustrations, by their nature, are not verified and are provided only to give an indication of the likely effect.*"
- 1.1.2 It should be noted that all the views submitted with the application for assessment within the Built Heritage, Townscape and Visual Impact Appraisal, were discussed and agreed with the Local Authority, no additional views were requested.
- 1.1.3 The following pages provide verified views from a selection of the view points from Doug Black's Proof of Evidence in order to assess the accuracy of his analysis. The camera location of the three verified views has been as closely matched to the location of the figures as possible.
- 1.1.4 It is clear from the selection of verified views that the images provided by Doug Black are notably incorrect. Therefore assessments derived from these images, including the associated conclusions within Doug Black's evidence, are inherently flawed.

Castlebrook Close (Doug Black Proof of Evidence, Figure 4)



Figure 1.01 - Extract from Doug Black's Evidence (Figure 4) - Castlebrook Close looking towards the application site



Figure 1.02 - Verified view from Castlebrook Close towards the application site - proposal shown in red, approximate cropping of Doug Black's image in white.



Figure 1.03 - Camera location

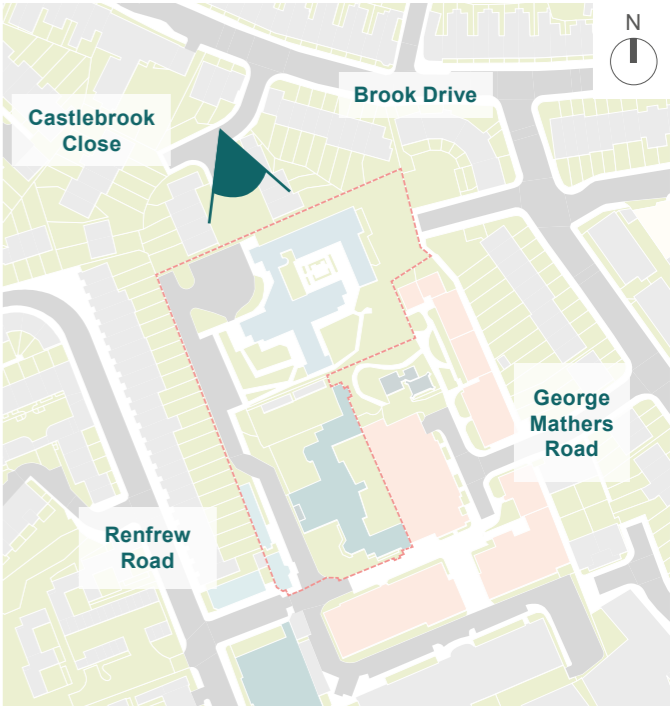


Figure 1.04 - Key Plan of camera location

The Master's House from the Workhouse Gates (Doug Black Proof of Evidence, Figure 6)



Figure 1.05 - Extract from Doug Black's Evidence (Figure 6) - The Master's House from the workhouse gates



Figure 1.06 - Verified view of The Master's House from the workhouse gates, proposal shown in red.



Figure 1.07 - Camera location

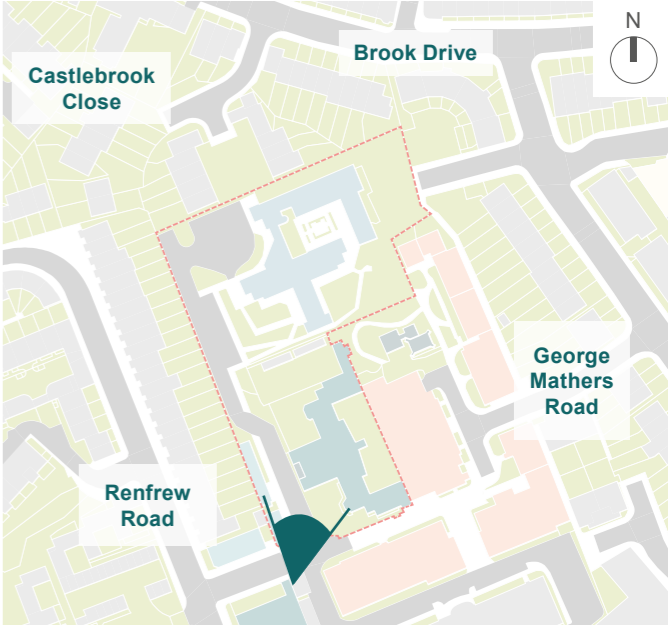


Figure 1.08 - Key Plan of camera location

Water Tower from George Mathers Road (Doug Black Proof of Evidence, Figure 11)



Figure 1.09 - Extract from Doug Black's Evidence (Figure 11) - Water Tower from George Mathers Road



Figure 1.10 - Verified view of the Water Tower from George Mathers Road, proposal shown in red.



Figure 1.11 - Camera location

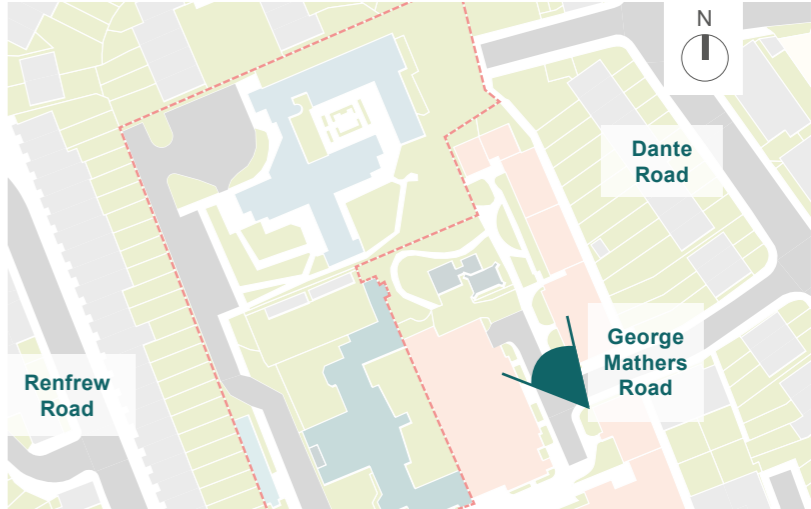


Figure 1.12 - Key Plan of camera location