

TOWN AND COUNTRY PLANNING ACT 1990

Appeal Site: Woodlands Nursing Home, 1 Dugard Way, London SE11 4TH

Development: Redevelopment of the former Woodlands and Masters House site retaining the Masters House and associated ancillary buildings; demolition of the former care home; the erection of 29 storeys building and peripheral lower development of 3/4 storeys, to provide 258 residential units, together with servicing, disabled parking, cycle parking, landscaping, new public realm, a new vehicular and pedestrian access, and associated works.

Appellant: Anthology Kennington Stage Ltd

REBUTTAL

PROOF OF EVIDENCE ON BEHALF OF THE STOP THE BLOCKS COMMUNITY ACTION GROUP

VINCENT PIERCE MAHER MA (CANTAB) MCD MBA MSc MRTPI

Planning Inspectorate Appeal Reference: APP/N5660/A/19/3248960

Lambeth Council Planning Application Number: 19/02696/FUL

CONTENTS

REBUTTAL	1
CHARLES GRAHAM'S PROOF OF EVIDENCE	1
GATES AT DUGARD WAY	20

REBUTTAL

1. This rebuttal proof has been prepared in response to Charles Graham's proof of evidence quoting relevant parts of his proof where necessary. It also provides an update to the inspector with reference to the gates at Dugard Way.

CHARLES GRAHAM'S PROOF OF EVIDENCE

2. Page 21, Section 3.5 - the photos of the existing area in this section are potentially misleading as they show as many tall buildings as possible. I do not consider that they give a fair depiction of the specific context of the streets identified by the photograph key on the map in Figure 3.15.
3. Page 21 Figure 3.15 - the key to where each photo has been taken and its angle of view in Figure 3.15 is incorrect. Again, I do not consider them a fair depiction of the context. Rather I include other photographs which I consider more accurately reflect the specific character of each area.
4. Page 21 Figure 3.12 Photo 01 St Mary's Gardens – the view in Mr Graham's report has been taken from the furthest cul-de-sac in the square to capture as clear a view of the towers at the Elephant and Castle as possible. As a former longtime resident of the Walcot Conservation Area, I offer other views of the same space.

Woodlands Nursing Home, 1 Dugard Way, London SE11 4TH
Rebuttal proof of Vincent Maher



Woodlands Nursing Home, 1 Dugard Way, London SE11 4TH
Rebuttal proof of Vincent Maher



Woodlands Nursing Home, 1 Dugard Way, London SE11 4TH
Rebuttal proof of Vincent Maher



5. Page 21 Figure 3.13 - Photo 02 Walcot Square – I do not consider the photograph Mr Graham has submitted accurately describes the character of this area. I submit alternative views of the same space.



Woodlands Nursing Home, 1 Dugard Way, London SE11 4TH
Rebuttal proof of Vincent Maher





6. Page. 22 Section 3.6.2 – I do not consider the ‘photographic walk’ round the site mentioned in this section is fair. As with Section 3.5 of Mr Graham’s proof, I consider the photographs linked to Figure 3.18 Building Typologies Map have been taken to try and maximise all possible views of the tall buildings at the Elephant and Castle.

7. Page. 22. Mr Graham writes in Section 3.6.3, "The diagram opposite shows that whilst there is a fine grain of traditional street housing to the north and west of the site, to the south and east there are large building footprints with little or no defined urban grain." This is incorrect. There is a row of two storey

houses with back gardens along Dante Road to the immediate east / south east of the site.

8. Page 22. Fig 3.19 Photo 01 - This photograph purports to show housing on Renfrew Road housing but has actually been taken from Gilbert Road to the west. It is also one of the only views of the Renfrew Road houses that takes in the towers at the Elephant and Castle along with the houses.



Woodlands Nursing Home, 1 Dugard Way, London SE11 4TH
Rebuttal proof of Vincent Maher



9. Page 22 Figure 3.20 Photo 02 - This is incorrect as it shows a 10-storey block on Kennington Park Road, well outside of the area of Fig 3.18 Building Typologies Map shown. It is keyed to the Kennington Lane side of the estate (see photograph below).



10. Page. 22 Figure. 3.21 Photo 03 is also incorrect. The photograph is actually of housing further north along Brook Drive, and not of the location shown on the Fig 3.18 Building Typologies Map. It is unclear whether it has been chosen because this is where the tall buildings at the Elephant and Castle can be seen from. Instead, I submit alternative photographs below of the area keyed on Mr Graham's Figure 3.18.



Woodlands Nursing Home, 1 Dugard Way, London SE11 4TH
Rebuttal proof of Vincent Maher



11. Page. 23 Figure 3.25 Photo 07 has been taken in a way to include a tall building within the shot. I have taken other views below of the same area.



Woodlands Nursing Home, 1 Dugard Way, London SE11 4TH
Rebuttal proof of Vincent Maher



12. Page. 23 Figure 3.26 Photo 08 - this has also been taken at an angle to include the tall buildings at the Elephant and Castle. I submit photographs of other views below.





13. Page. 23 Figure 3.27 Photo 09 is not a fair of this Post-war housing block with internal garden courtyard. It is of their car park. I do not think this was taken from the position keyed on the map. The block actually has a varied form, with an internal courtyard and gardens, roof terraces and balconies. Again I submit additional photographs to illustrate this.

Woodlands Nursing Home, 1 Dugard Way, London SE11 4TH
Rebuttal proof of Vincent Maher



Woodlands Nursing Home, 1 Dugard Way, London SE11 4TH
Rebuttal proof of Vincent Maher



Woodlands Nursing Home, 1 Dugard Way, London SE11 4TH
Rebuttal proof of Vincent Maher



GATES AT DUGARD WAY

14. The gates to the entrance at Dugard Way have been fitted.



Woodlands Nursing Home, 1 Dugard Way, London SE11 4TH
Rebuttal proof of Vincent Maher

