



**ANTHOLOGY  
KENNINGTON STAGE**

Built from London

**PROOF OF EVIDENCE**

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Landscape Architect

October 2020

**FARRER  
HUXLEY**

## **Proof of evidence on Quality of Amenity Space (Refusal Reason No. 8)**

October 2020

**Appellant:** Anthology Kennington Stage Limited

**Location:** Kennington Former Woodlands and Masters Site,  
off Dugard Way,  
Kennington SE11 4TH

**PINS Reference:** APP/N5660/W/20/3248960

**LPA Reference:** 19/02696/FUL

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## **1.0 Introduction**

1.0.1 This proof of evidence covers the external works communal amenity and play space and addresses:

### **1.0.2 Reason for Refusal RR8**

*“The proposed layout and design of communal amenity and playspace is inadequate in terms of its quality, safety and usability which in turn would result in a poor-quality residential environment for future occupiers of the development.” (Reason for Refusal – RR8).*

1.0.3 This report identifies the areas that determine quality in the amenity space. These are, the play provision and the feeling of a place that is safe to use and enjoy. This proof identifies how these issues are resolved through the careful refinement of the proposed scheme submitted at planning. These refinements indicate how the scheme would be developed when carrying out the detailed work to meet the anticipated hard and soft landscape draft conditions proposed subject to the appeal being allowed.

1.0.4 This proof of evidence concludes that the external works aspects of the proposals will achieve an acceptable standard of quality and meet the requirements of the proposed draft conditions and the following pertinent planning policies

- a. NPPF (2019) Chapters 2 and 12;
- b. London Plan Policies 3.5, 3.6;
- c. Mayor’s Play and Informal Recreation SPG;
- d. Lambeth Local Plan (2015) Policies H5 and Q1;
- e. Draft Revised Lambeth Local Plan Policies H5 and Q1.3.0

## **1.1 Report Structure**

- 1.1.1 The report firstly acknowledges the areas of agreement as set out in the Statement of Common Ground. It then identifies and clarifies further refinements to the scheme that affect the areas of agreements.
- 1.1.2 The report secondly states the areas of disagreement, and the refinements to the proposals to address the areas of disagreement.
- 1.1.3 The above is then summarised.
- 1.1.4 The Appendix to the report provides the detail of the scheme refinements with views and drawings to support the report.

## **1.2 The Author**

- 1.2.1 My Name is Noel Farrer CMLI PPLI FLI
- 1.2.2 The Landscape Institute (LI) is the professional Body for Landscape Architecture.
- 1.2.3 I am a chartered member and Fellow of the LI and have been chair of the LI Policy committee and am a past president (2014 - 2016).
- 1.2.4 I have other roles and areas of responsibility. These include being a member and chair of a number of design review panels including being a Design Council Built Environment Expert (BEE) and present chair of the Essex Quality Review Panel.
- 1.2.5 I am a member of Highways England's Strategic Panel and their Design Review Panel.
- 1.2.6 I am a High Street Task Force (HSTF) Expert and representative of Design Council and MHCLG.
- 1.2.7 I am a Director of Farrer Huxley Limited a Registered Practice of the LI founded in 1995. Farrer Huxley Ltd are the landscape practice commissioned to develop the design for the complete external works for Anthology at the Woodlands and Masters site in Kennington.

1.2.8 I have worked as a Chartered Landscape Architect (CMLI) since 1991 and have undertaken all stages and scales of design, masterplanning and delivery of landscapes in both the urban and rural context.

1.2.9 Relevant to the project (that is the subject of this proof of evidence) Farrer Huxley with Noel Farrer being ultimately responsible have undertaken many award winning mixed use and housing projects in London. These include:

1.2.10 **Burridge Gardens** 538 homes for Peabody in Wandsworth London  
**Awards:** RIBA London 2017  
Best housing development - Brick Awards 2016

1.2.11 **Market Yard** Public realm, Deptford Lewisham, London  
**Awards:** Mayors Prize Commendation NLA Awards  
Best Heritage Led project – London Planning Awards

1.2.12 **Woodside Square** 161 new homes for Hanover, Muswell Hill, Haringey, London  
**Awards:** Commended - Civic Trust Awards 2019;  
Highly Commended, Development of the Year (More Than 100 Homes) - Sunday Times British Homes Awards 2018;  
Best Urban Design - Haringey Design Awards 2018;  
Silver, Best Development – What House? Awards 2018

### 1.3 Declaration:

1.3.1 The opinions expressed in this report are my professional opinions.

## 2.0 Areas of agreement - Statement of Common Ground

2.0.1 The Statement of Common Ground acknowledged the following areas of agreement for the amenity space:

### 2.0.2 Quantum of Amenity Space:

Policy H5 of the Lambeth Local Plan states

*“The council will require at least the following level of external amenity space for all residential units:*

2.0.3 *(ii) For new flatted developments, communal amenity space of at least 50m<sup>2</sup> per scheme should be provided, plus a further 10m<sup>2</sup> per flat provided either as a balcony/ terrace/private garden or consolidated with the communal amenity space”.*

2.0.4 The quantum of Amenity Space of 3250m<sup>2</sup> (incl. internal balcony space) is acceptable and meets the London Borough of Lambeth requirements.

2.0.5 The quantum of multi-functional space (suitable for all ages) of 1710m<sup>2</sup> is acceptable and meets the London Borough of Lambeth requirements.  
*(Refer to Appendix A figure 2)*

## 2.1 Policy requirement for play

2.1.1 Areas required (child yield as per SPG London Plan policy H5)

Doorstep (under 5)	191 m <sup>2</sup>
Neighbourhood (5-11)	123 m <sup>2</sup>
Youth (12+)	84 m <sup>2</sup>
<b>Total Dedicated play area Required</b>	<b>399 m<sup>2</sup></b>

2.1.2 The dedicated play provision proposed in the refined scheme is 590m<sup>2</sup> and exceeds the policy requirement of 399m<sup>2</sup>. This is an additional 191m<sup>2</sup> or 33% above the requirement.

The play area locations of the planning submission layout and the final refined scheme are illustrated in the appendix figures 1& 2.

**2.2 Variation of agreement as set out in the refined appeal scheme**  
*(Refer to 3.2.1 for reason for refinement)*

2.2.1 The Council acknowledged and accepted the quantum of dedicated play space of 672m<sup>2</sup>. In the proposed appeal scheme the area of dedicated play has been re-measured and now achieves an area of 590m<sup>2</sup>.

2.2.2 The refined area of play reflects that of the previous scheme but does not include areas which technically are within the dedicated play area but on review are in any way inaccessible or limiting play use.

2.2.3 We have therefore discounted all areas near walls or windows or have restricted access. This is to ensure a high-quality level of provision only.

2.2.4 The revised area is still more than the SPG requirement for play (refer to 2.1)

### 3.0 Areas of disagreement - Statement of Common Ground

*Basis of refusal - Refusal reason N°8 in the LPA Statement of Case 24<sup>th</sup> June 2020.*

3.1.1 As stated in the delegate officers report for the Woodlands Nursing Home the reason for refusal and the basis on which the local planning authority will support its case at the appeal is:

3.1.2 *“The proposed layout and design of communal amenity and play space is inadequate in terms of its quality, safety and usability which in turn would result in a poor-quality residential environment for future occupiers of the development.  
(Statement of Case - Delegated Officer Report - Basis of refusal - Refusal Reason N°8 clause 6.1.42)*

3.1.3 As such the proposals would be contrary to policies:

- a. NPPF (2019) Chapters 2 and 12; London Plan Policies 3.5, 3.6;
- b. Intend to Publish London Plan (December 2019) Policies D4 and D6;
- c. Mayor’s Play and Informal Recreation SPG;
- d. Lambeth Local Plan (2015) Policies H5 and Q1 and;
- e. Draft Revised Lambeth Local Plan Policies H5 and Q1 (Submission Version January 2020).

3.1.4 This refusal point (8) is addressed in the Officer Delegated Report in (Appendix 1) at section 10.5.23 - 10.5.31 The reason for refusal concerns the inadequate design and layout of communal amenity and play space provision and the resulting poor residential environment for future occupiers of the development.

*“The Council’s position is that the approach to the layout and design of the open areas around the buildings will create one multi-functional space that has to attempt to cater for a wide range of demands, including disabled car parking, providing access and manoeuvring spaces for service and delivery vehicles and a through route for pedestrians and cyclists. The consequence of the proposed approach is that the amenity areas are not considered to be safe and usable and therefore results in a poor-quality environment for residential occupiers”.*

(Reference: LPA Statement of Case 24<sup>th</sup> June 2020 - Reason for Refusal 8 – clause 6.1.44)

### 3.1.5 The planning Policies in more detail:

- 3.1.5.1 The LPA Statement of Case 24<sup>th</sup> June 2020 clause 6.1.45 states the need to comply with policies **H5 and Q1(b) of the Lambeth Local Plan** including the design principles set out in the **Mayor’s Play and Informal Recreation SPG** advocate that the design of development should promote play areas that are easily accessible, overlooked and enclosed either through fencing, railings or other safety features.
- 3.1.5.2 The Council will also demonstrate that the lack of legible and safe amenity provision derives directly from the quantity of built development proposed by the Appeal Scheme.  
(Reference: LPA Statement of Case 24<sup>th</sup> June 2020 - Reason for Refusal 8 – clause 6.1.44)
- 3.1.5.3 *“The Reason for Refusal concerns the inadequate design and layout of communal amenity and play space provision and the resulting poor residential environment for future occupiers of the development”*  
(Reference: LPA Statement of Case 24<sup>th</sup> June 2020 - Reason for Refusal 8 –clause 6.1.43)
- 3.1.5.4 This Reason for Refusal is a direct reference to **London Plan Policy 3.5 - Quality and design of housing developments (Strategic B)**
- 3.1.5.5 The design of all new housing developments should enhance the quality of local places, taking into account physical context; local character; density; tenure and land use mix; and relationships with, and provision of, public, communal and open spaces, taking particular account of the needs of children, disabled and older people.
- 3.1.5.6 Reason for Refusal 8 point 6.1.45 references the **Lambeth Local Plan Policy H5 and Q1(b)** including the design principles set out in the Mayor’s Play and Informal Recreation SPG which advocates that:
- 3.1.5.7 *“the design of development should promote play areas that are easily accessible, overlooked and enclosed either through fencing, railings or other safety features”.*

- 3.1.5.8 Other supporting text in **Q1 of the Lambeth Local Plan** states:
- 3.1.5.9 *“a) The council will:  
(iii) expect applicants to show in their supporting statements how their proposals achieve inclusive design.  
(b) The design of developments should reflect good practice principles for promoting child-friendly housing and environments”.*
- 3.1.5.10 The **London Plan Policy 3.6 Play Provision Strategic A** states
- 3.1.5.11 *“The Mayor and appropriate organisations should ensure that all children and young people have safe access to good quality, well-designed, secure, and stimulating play and informal recreation provision, incorporating trees and greenery wherever possible”.*
- 3.1.5.12 Other Supporting text:  
*“3.40 ... boroughs should ensure the integration of play provision into overall open space strategies.*
- ... appropriate provision should be included for different age groups, including consideration of communal space, roof gardens, indoor space for young children and youth facilities for young people*
- ... wherever possible, play space should include grassed or wooded areas”.*
- 3.1.5.13 **The London Plan biodiversity (Policy 7.19)** seeks to encourage and promote the importance of habitat creation in all schemes to promote bio-diversity.

## **3.2 Scheme details to address the above policies 3.1.3 – 3.1.5.13**

- 3.2.1 It is normal for details of landscaping to be submitted via condition and we would expect that to be the case here. However, as refusal reason 8 specifically centres on the quality of the landscaping and amenity space, rather than the quantum, we have further developed this element of the scheme (referred to as ‘refinements’ for the purpose of this document) to demonstrate that exemplary and fit for purpose amenity space can easily be provided. While this is illustrative at present, it fully addresses the refusal reason, and we would expect a detailed landscaping approach to be further conditioned.
- 3.2.2 The appeal scheme delivers both the quantum (undisputed) and quality of communal and open space. The open space is the heart of the scheme providing convenient and close by access to seating, play and nature. The organisation of vehicular movement limits access to the central public realm and play spaces dramatically improving the quality and usability of all areas.  
*(Refer to Appendix A figure 4).*
- 3.2.3 The planting and seating creates quieter and more contemplative spaces for those seeking peace and quiet. Planting also surrounds the play space allowing children the opportunity to discover nature as an important part of play.  
*(Refer to Appendix A figure 8 tree strategy, figure 10 soft landscape strategy and figure 20 illustrative view).*
- 3.2.4 The seating considers all users and is designed to allow longer periods of time to be spent outside. The scheme specifies wooden seats with arms and backs to enable the less abled and elderly the opportunity to take advantage of the being outside and dwell for longer.  
*(Refer to Appendix A figure 14)*
- 3.2.5 In addition the appeal scheme has been refined in the following areas addressing the policy requirements as follows:

### **3.2.6 Legibility and use:**

- a. Unite the ground plane through a continuous surface treatment of granite paving rather than applying varying surface finishes reducing legibility. The singular materiality and use of granite allow variation and patterning to deliver distinctiveness whilst ensuring a single legible identity for the whole site. Subtle colour variation of the paving highlight vehicular and pedestrian areas further improving safety and legibility. *(Refer to Appendix A figures 4 public realm and amenity space provision and figure 6 hard landscape strategy).*
- b. Create legible routes and views into and out of the development. The position of trees focuses views and reinforces the corridors of movement into and through the public realm. *(Refer to Appendix A figure 23)*
- c. Carefully articulate spaces through subtle surface changes to improve legibility and movement as well as better designating spaces for play and relaxation. *(Refer to Appendix A figures 6 hard landscape strategy and figure 11 play strategy)*
- d. Mirror the existing entrance pillars at the site entrance off Dugard Way by creating similar gate pillars to the Longville Road site access point to better signal arrival and home coming. *(Refer to Appendix A figure 13 boundary strategy)*

### **3.2.7 Transport - Deliveries, Cars, parking and Bicycles**

- a. Please note the concerns of disabled parking, cycle storage and service vehicle manoeuvring is addressed in the transport proof of evidence (refer to Vectos Transport report/ October 2020).
- b. Clearly demark and limit zones for vehicular movement with only small parking areas of Dugards Way and Longville Road having vehicular access. *(Refer to Appendix A figure 4 public realm and amenity space provision).*

### **3.2.8 DDA/Accessibility:**

- a. Provide seating opportunities along the route for residents and museum visitors to sit as well as for carers to meet and oversee children playing. *(Refer to Appendix A figure 14 furniture strategy and figures 20, 21 and 22 illustrative views.)*
- b. The access from the wider area coming to the site provides level access and shallow thresholds to ensure ease of access and meeting DDA requirements. *(Refer to Appendix A kerb and edging drawing 709-FHA-XX-00-DP-L-202 Rev P4).*
- c. The seating is appropriate for all ages and abilities ranging from informal to formal with arms and backs. *(Refer to Appendix A figure 14 furniture strategy).*
- d. The materiality is light in colour with contrasts to provide warning of edges etc. to aid those partially sighted
- e. The scheme is lit to provide minimum lighting (lux) levels for amenity and public use.
- f. The play and amenity spaces are all at grade with no steps in the public realm.

### **3.2.9 Play Provision:**

- a. The play and amenity spaces in the centre of the site are vehicle free making them safe to move through and play. *(Refer to Appendix A figure 4 public realm and amenity space provision).*
- b. Easy access to planting and trees as part of the dedicated areas for play. This allows children close and safe access to nature for contemplative and discovery aspects of play. *(Refer to Appendix A figure 4 public realm and amenity space provision).*

- c. The dedicated play zones have been moved to reflect better overlooking, and in safer locations for play.  
*(Refer to Appendix A figures 1 & 2 play provision and quantum).*
- d. The areas have been scrutinised and adjusted to only include optimal areas for play with no constraints.
- e. The total area of dedicated play is more than the requirements of policy and the GLA SPG (590m<sup>2</sup> provided and 399m<sup>2</sup> required by the standard).
- f. The boundaries to the play space have been considered with the appropriate enclosure being provided through the surrounding buildings and adjacent planted spaces.  
*(Refer to Appendix A figure 4 public realm and amenity space provision).*
- g. The play offer and equipment are wide ranging including fixed and bespoke equipment and informal landscape pieces suitable for all ages and abilities.  
*(Refer to Appendix A figure 11 play strategy and page 22 images of play palette).*
- h. The play area includes direct access to grass, shrub, and tree areas.
- i. The securing of the dedicated play area with fencing or railings is unnecessary where there is little or no risk of wandering into areas of vehicular movement or having access to much wider areas (as in parks). The play space is naturally bounded by the buildings, walls and planting as well as wider clear areas of traffic free public realm. These boundary treatments meet the spirit of the policy to secure play space and the welcoming environment where the public realm is seen as a playable landscape as stated in the SBG 3.24 (playable space in a child friendly city).  
*(Refer to Appendix A figure 4 public realm and amenity space provision).*

### **3.2.10 Bio-Diversity:**

- a. The area of herbaceous planting has been increased by 84m<sup>2</sup> utilising planting for texture, colour and height to positively contribute to creating an inviting and desirable place.  
*(Refer to Appendix A figures 9 & 10 soft landscape strategy).*
- b. Use of a more naturalised planting palette increasing biodiversity and responding to people's need to be closer to nature, especially in a post Covid-19 world.  
*(Refer to Appendix A page 20 – soft landscape palette)*
- c. The planting is 'wilder' and of a natural palette of species to maximise biodiversity and reduce the need for intervention (maintenance).  
*(Refer to Appendix A page 20 – soft landscape palette)*
- d. The inclusion of bird boxes, bat boxes, rockeries and loggeries as the key recommendations stated in the ecology appraisal have been incorporated as part of the planning submission.

### **3.3 Summary:**

- 3.3.1 The Basis of refusal - Refusal reason N°8 in the LPA Statement of Case 24<sup>th</sup> June 2020 that states the proposed layout and design of communal amenity and play space is inadequate in terms of its quality, safety, and usability.
- 3.3.2 This section addresses the policies and standards required and the adjustments to the design approach to ensure the appropriate level of quality is achieved.
- 3.3.3 The safety and usability are addressed through ensuring a more legible and safer space for play and amenity use. The adjustments to location of dedicated spaces, the increased amount and variety of play equipment and the provision of a greener and more accessible setting all evidence that quality has been improved and meets the relevant policies.
- 3.3.4 The overall quality of the amenity is achieved through changes in design of entrances and wayfinding thereby improving legibility, materiality, tree positions, a larger extent of planting and clear restrictions of the areas for vehicular access. These all together improve the experience both moving through the landscape and for those looking to use it and play in it. This demonstrably shows improved usability such that I now consider it meets all relevant policies.

## **4.0 Summary and Conclusion**

- 4.0.1 This proof responds to the reason for refusal N°8 as set out in LPA Statement of Case 24<sup>th</sup> June 2020.
- 4.0.2 The proof sets out the policies and standards that need to be adhered to and goes on to examine the refined appeal proposals clearly expresses the qualities of the scheme.
- 4.0.3 This proof makes clear that the proposal presented here evidences that a robust and clear design narrative has been thoroughly undertaken. This has concluded in a design that meets both the standards as set out in relevant policies, guidance, and the more subjective idea of quality. Quality is stated as not being achieved because of aspects of “safety and usability”. The proposals have concerned themselves to actively address these areas and in my opinion now provide an acceptable level of safety and usability.