

Town and Country Planning Act 1990: Section 78 Appeal

21/57 Willow Way, London, SE26 4AR

Proposed Demolition and Redevelopment to provide  
employment floorspace and residential units

Planning Inspectorate Ref: APP/C5690/W/23/3321935

Proof of Evidence of Henrik Lonberg, AA Dipl ARB,  
of Flanagan Lawrence

Core Document 5.9

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Contents

- 1. Executive Summary.....3
- 2. Introduction.....3
- 3. Development Proposals.....4
- 4. Summary of Design Issues.....4
- 5. Design Assessment.....6
- 6. Response to Design Issues.....11
- 7. Conclusion.....16

## **1. Executive Summary**

- 1.1. My Proof of Evidence has been prepared to address the urban design matters arising from the Reasons for Refusal of the London Borough of Lewisham ('LBL') in their capacity as the Local Planning and Local Highway Authority in relation to the Planning Application for the Proposed Development at Plot A, 21-57 Willow Way, London, SE26 4QP ('the Site'). The Planning Application was refused by LBL on the 23rd of March 2023.
- 1.2. My proof of evidence relates to urban design of the proposals on Site A. Of the six Reasons for Refusal that were identified in the LBL Decision Notice [CD 2.1], the second and the fourth Reasons for Refusal are considered to relate to urban design matters. These are primarily in relation to: context based design, building height and form, quality of design and public realm.
- 1.3. In addition to the Decision Notice, LBL provided further commentary and justification for the identified Reasons for Refusal within their Statement of Case (SoC) [CD 5.4] including reference to the Officer's Report [CD 2.2]. Whilst more detail is provided in relation to the urban design matters within the SoC, the contested matters identified are considered to be consistent with the Reasons for Refusal.
- 1.4. My Proof of Evidence sets out how the matters raised by the LBL are considered to be appropriately addressed within the information already submitted in support of the Planning Application, the additional information provided during the determination period, and as part of the information within this Proof of Evidence.
- 1.5. For the reasons explained in this proof of evidence, it is my professional opinion that there is no justification for refusing the proposed development on the urban design grounds set out in Refusal Reasons 2 and 4.

## **2. Introduction**

- 2.1. My name is Henrik Lonberg. I am Project Director at Flanagan Lawrence, a London based architectural firm. I am qualified Architect registered with the Architects Registration Board.
- 2.2. With over 20 years of professional experience spanning various sectors, a significant part of my work has been in design of housing including mixed-use developments. Working predominantly in London, I have designed and overseen delivery of projects ranging from single family dwellings to 170 unit schemes.

- 2.3. I have been instructed by the Appellant to act as an expert witness with regards to urban design matters in this Inquiry. I was not involved with the design of the Proposals or the planning application.
- 2.4. The evidence which I provide for this appeal has been prepared and is given in accordance with the guidance of my professional institution, and I confirm that the opinions expressed are my true and professional opinions.

### **3. Development Proposals**

- 3.1. The proposed development as described in the Planning Application is as follows:

*“Demolition of existing buildings and redevelopment of the site comprising a block rising to 5/6 storeys accommodating 1,401sqm of employment floorspace (Use Classes E(g)(i)(ii)(iii)) at ground and mezzanine floors and 60 residential units (Use Class C3) above, with associated landscaping, amenity areas, cycle, car parking and refuse/recycling stores at 21-57 Willow Way, London, SE26.”*

- 3.2. The Proposed Development (Plot A), forms part of Site SA481, as identified within the Lewisham Site Allocations Local Plan (adopted June 2013) [CD 4.34], which is identified as Willow Way Local Employment Location (LEL).
- 3.3. The Planning Application is supported by an Emerging Outline Masterplan for the Employment-led mixed use redevelopment of Willow Way [CD 1.14].
- 3.4. This proof of evidence relates to proposals for Site A only. Design issues concerning the masterplan are addressed in the Proof of Evidence by Jason Flanagan, Flanagan Lawrence [CD 5.8].

### **4. Summary of Design Issues**

- 4.1. The design issues raised by the London Borough of Lewisham (LBL) in their Notice of Refusal [CD 2.1] are included in the Second Reason for Refusal:

*“The lack of detail on the proposed uses across the masterplan site results in a failure to demonstrate that the intensified co-location of uses can function at the proposed capacity of the masterplan site. Furthermore, it results in officers being unable to conclude that the proposal*

*would meet the relevant transport, design, public realm or environmental policy (noise, air quality as well as sustainable urban drainage, energy and biodiversity) requirements. The granting of this application in absence of these details would fetter the development opportunity of the adjoining sites and undermine the objectives of the wider site allocation and masterplan area. The proposal would therefore fail to meet policies D3, D13, E6, E7 and SI 11 in the London Plan (2021), Policy E3 in the Lewisham Core Strategy (2011) as well as emerging policies (Site Allocation 9: Willow Way, EC2, EC3, EC6) in the Lewisham Local Plan Propose Submission Document- Regulation 19 Stage (January 2023)."*

And in the Fourth reason for Refusal:

*"No townscape views have been submitted and the proposal does not demonstrate a context based design that responds to local character, including surrounding heritage assets. Furthermore, the building heights in the masterplan area are excessive and without additional information, officers cannot conclude the proposals would result in high quality design or preserve local heritage assets. The proposal is therefore contrary to policies D3, D6 and HC1 in the London Plan (2021); paragraph 126 in the NPPG and paragraphs 127, 130, 199, 200 and 203 in the NPPF (2021) and; sections 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990."*

- 4.2. The reasons for refusal cover several aspects of the proposals. This proof of evidence specifically addresses design matters as further detailed in the LBL Statement of Case [CD 5.4] paragraph 7.71 within the section on Masterplan and urban design:

*"In addition, the Council has a number of concerns with the Proposal (i.e. Plot A) from an urban design perspective. These are set out within the urban Design section of the Officer Report (paragraphs 202 to 277) and include the following:*

- *The applicant has not demonstrated an understanding or evaluation of the unique characteristics of the site. The proposed architectural articulation is not informed by the local context, nor does it set itself apart from it in a meaningful way; it is not distinctive. The residential character of the upper floors appears to have informed the architecture of the ground floor, whereas the requirement for the development to be employment-led would have this relationship reversed, with a stronger ground floor identity that anchors the scheme to the public realm. While the proposal is not offensive in terms of the architectural articulation, it does not provide adequate interest for its scale, and is not supported in design terms.*

- *A reduction in units, alongside an exercise in maximising plan efficiency could provide the opportunity to introduce more cut backs and openings between the front and back of the site, reinstating a relationship with the Sydenham Park Conservation Area.*
- *The proposed building form lacks coherence, with poor balance between solid/void, public/private, and commercial/residential use. The built form, in terms of scale, mass and bulk, is not supported in its current form.*
- *The public / private edge where the building meets the ground has not been well mediated, with loading bays obscuring views to the residential core entrances when approached from Kirkdale.*
- *No buffer zone / softening has been provided between the pavement and the hard edge of the building. More separation between the building and the road should be provided.*
- *No provision for public furniture, pause spaces or street trees has been made in relation to the Proposal site.*

4.3. Following the submission of the Planning Application townscape views were submitted to LBL included within a Townscape and Visual Assessment prepared JGHP [CD 5.3.1]. For a review of this document and further assessment of the impact refer to Proof of Evidence by Andy Shelley, PCA Heritage CD 5.10].

4.4. Transport related matters are addressed in Proof of Evidence by Mark Kirby, Velocity Transport Planning [CD 5.11].

## **5. Design Assessment**

5.1. In order to consider the design issues raised by LBL, I have undertaken an assessment of the proposals, relative to the site and the context, as set out in this section following the relevant assessment criteria of Layout, form and scale of buildings (massing), appearance, materials and their detailing, and landscaping.

### Layout

5.2. The site occupies an area of 2239m<sup>2</sup> and measures approximately 106m x 38m at the widest point. The site is located on the eastern side of Willow Way, which runs almost exactly north south. The site is triangular in shape with its longest side facing Willow Way. The site is virtually flat in a north south direction, with a gentle slope from west to east across the site There is a difference in level between the site and the care home and associated car park to east, which

- sit lower than the site. The difference in level is negotiated by a retaining feature along the eastern boundary of the site.
- 5.3. The site is accessible along the western boundary facing public highway. Northeast and south east boundaries both face adjoining owners.
  - 5.4. In their proposals the applicant has positioned the building mass along the western boundary of the site along Willow way, where the site is at its longest, thereby optimising the potential floor area in the north south direction. Pulling the building to the west maximizes the distance between the proposed building and the buildings to the east of the site. An assessment of the relationship between the site and the adjacent properties has been included in the Design and Access statement, including existing and proposed separation distances as well as photographic documentation of existing windows in the care home. These are shown on page 36-40 of the Design and Access Statement. When excluding windows to bathrooms and corridors in the care home separation distances are in excess of 21m.
  - 5.5. Considering both the need to optimise the proposed floor area and the need minimize impact on the adjacent properties to the east with regards to view out, overlooking and sunlight/daylight, positioning the proposals along the western boundary is the correct approach. This strategy is further supported by the presence of the Sydenham Park Conservation Area immediately east of the site., although as illustrated by the TVIA [CD 5.3.1] only occasional glimpses of the Proposals will be visible from streets within the conservation area (views 9-13 of the TVIA).
  - 5.6. At the northern end of the site, it is proposed to build up against the existing flank wall of 10-14 Willow Way thus optimising the site potential in this direction. 10-14 Willow Way currently sits rather uncomfortably in its own in the townscape, due to its shape and positioning at an angle to the street will small openings on the narrow street elevation. By extending the proposed building up to the site boundary, the mass of 10-14 Willow Way will be physically and visually joined with the new building and present a more coherent whole, as illustrated by the artist's impression on page 51 in the Design and Access Statement [CD 1.11].
  - 5.7. At the southern and narrowest end of the site the proposed footprint extends close to the edge of the site, whilst maintaining sufficient separation to the boundary to allow for windows to this elevation (south east elevation facing the care home car park).

- 5.8. The main section of the proposed block measures 21m across which, compared to most other residential schemes, provides for quite a deep floor plan, further helping to optimise the use of the site. By inclusion of the detailed flat layouts in the planning application the applicant has demonstrated that the depth of the floor plan is not to the detriment of the quality of the residential units. On the contrary, the deep block provides opportunities for inset balconies and recesses in the massing, which helps to provide a high percentage of dual aspect units.
- 5.9. Altogether, the positioning and orientation of the building makes efficient use of the site and is supported by the site analysis within the Design and Access Statement. It would not be possible to achieve an equal density with an alternative layout without significantly increasing the height of the scheme. The resulting north / south orientation of the block is ideally suited for residential accommodation in that it eliminates any north facing units
- 5.10. Adequate separation distances between the eastern elevation of the proposals and the western elevations to the care home on Shrubland Close and the houses on Sydenham Park have also been maintained as has been demonstrated within the DAS.
- 5.11. Building entrances to both residential and commercial, as well as ancillary uses are all located along Willow Way, and are easily identifiable and accessible.

#### The form and scale of buildings (Massing)

- 5.12. Proposals are for a single rectilinear building volume spanning the length of the site from north to south. At ground level the building is split into two sections allowing cars, cyclists and pedestrians access to the rear of the site.
- 5.13. The proposals range in height between 4 and 6 stories (counting the mezzanine as a storey). Two segments of 6 stories are positioned between lower segments of 5 stories. At the southern end the massing steps down to 4 stories to meet the 2-storey building on the adjacent site. By lowering the central part of the building and reducing the depth in plan, the scheme is expressed as two main volumes, joined by lower/narrower volumes. Visually this breaks down the scale of an otherwise long building, and to good effect. The breaking up of the massing is further enhanced by the change in brick colour. As illustrated by the artists' impressions and the coloured elevations included in the Design and Access Statement, the overall impression is one of several smaller elements using the same architectural language.

5.14. The Design and Access Statement includes mapping of existing building heights across the area. Whilst there is only one taller existing building in the immediate vicinity (Miriam Lodge - 8/9 storey hostel block northeast of the site), the proposed 6 storeys are comparable to the 5 storey buildings north of the site. Within the context of the existing buildings along Willow Way 6 storeys feels entirely appropriate, in particular when considering how proposals are stepping down at both the northern and the southern end of the site. The tallest 6 storey segments of the proposed mass have been positioned against Willow way and furthest away from the buildings to the east in the Sydenham Park conservation area thus minimizing impact on these. As demonstrated by the Townscape and Visual Impact Assessment [CD-5.3.1], when seen from the surrounding streets, the proposed scheme is largely screened by existing buildings. I note that in urban design terms the planning officers broadly support the massing and orientation proposed with regard to the immediate context (see paragraph 210 of the Officers' Report [CD 2.2]).

#### Their appearance

5.15. The scheme is for a recent typology combining residential apartments and industrial use, a typology for which the architectural expression does not have as many precedents as say residential only, or other mix of uses. The approach taken for the proposed scheme has been to develop a language unifying the two uses.

5.16. A series of large brick clad frames extending from the street to the parapet visually frame and join the industrial units with the residential units above. The frames suggest a regular structural grid, horizontal expressed at every other floor thus creating a double order. This is not a residential architecture, but rather an expression of workspace, typified by expressed structural grids and requirement for large glazed areas, and there are clear references within the design to early century factory and warehouses.

5.17. At the residential floor levels, solid panels have been inserted into the brick frames in order to reduce the amount of glazing down to that appropriate for residential use. The panels are proposed in grey metal which, when seen against the brick frames, will appear recessive and subordinate to the brick frames. Residential balconies have been set back behind the frames, so as to not protrude and visually proclaim the residential use. As such the industrial brick frames take precedent over the smaller residential scale. A further sign that the employment use is in fact the driver behind the design.

- 5.18. At street level the workspaces and residential entrances are glazed from floor to ceiling, interrupted only by the regular rhythm of the brick pilasters, providing the proposals with a sense of lightness as well as activating the frontage. The rhythm of the bays and the double order appear considered and they provide the building with a civic scale.
- 5.19. Each of the brick bays have been subdivided in either two or three sections, further breaking up the scale of the elevations in smaller elements. With some exception the vertical breaks to the residential windows align with those of the workspaces below, providing a sense of order to elevation.
- 5.20. At roof level the façade steps in and provides what can be described as an inverted cornice by way of continuous metal planters, thereby finishing the scheme upwards.

#### Materials; and Their detailing

- 5.21. The material palette for the scheme and associated detailing is set out on page 60-63 of the Design and Access Statement CD 1.11 by way of reference images and coloured elevations.
- 5.22. The predominant material is hand laid stock brick employed in two tones – red and yellow. The two types of brick are used to visually separate the taller / lower and protruding / recessed building volumes, breaking up the mass into smaller elements.
- 5.23. The proposed type of bricks takes its cue from the Local Character Analysis also included in the Design and Access Statement (page 23), illustrating how many of both historic as well as recent properties in the area are built from red and/or yellow stock brick. The exact manufacturer of brick is not suggested as this would normally be dealt with via discharge of condition.
- 5.24. Secondary elements including spandrel panels, window frames, railings and roller shutters are expressed in a medium/dark grey powdercoated metal. The coloured elevations suggest that the same grey finish is used for both the residential and the workplace facades, thus further unifying the architecture of the different uses. The same applies to the glazing, which is consistent across both residential and commercial use.
- 5.25. The proposed use of stock brick is a direct continuation of the existing context including the public house The Bricklayers Arms (red stock brick with garden wall in yellow stock brick) and the residential block Moore House (red stock) – both of which are adjacent to the site. The

overall material palette appears considered, appropriate for the location and respectful of the context.

- 5.26. Metal roller shutters to the workspace are illustrated as composed of horizontal segments This horizontality is repeated in the glazed-in metal panels to the apartments, creating a continuation of the detailing and the workspace and the residential units.
- 5.27. Window reveals are shown with a full brick return providing the elevation with depth, which adds to the overall articulation of the façade.
- 5.28. Horizontal bands of triple / quadruple soldier coursing are carried across the full length of the elevations emphasizing the horizontal section of the brick clad frames brick adding further interest to the elevation.

#### Landscaping

- 5.29. Landscape proposals are included within the Design and access Statement [CD 1.11] and set out in more detail in the Landscape Design Statement [CD 1.13].
- 5.30. The proposed building is positioned close to the back of the existing pavement / site boundary on Willow Way, with an increasing widening of the pavement towards the south. Proposals are for hard landscaping in the form of paving. Visitors cycle stands are provided at the northern and southern end of the site.
- 5.31. The area at ground level to the east of the site provides two wheelchair accessible car parking spaces and six bicycle parking spaces. Soft landscaping is laid out as a visual amenity benefitting both occupiers of the proposed scheme as well as those of the care home. The existing site boundary between the site and the care homes has been amended to provide greater transparency, than current conditions thus providing a view from the upper floor of the care home out over the site.
- 5.32. Shared amenity space serving the residential units are provided in the form of roof terraces at level 4, including hard and soft landscaping, areas of seating as well as play space. Calculations for the play space provision are included in the Landscape Design Statement.
- 5.33. Within the masterplan proposals for public realm are located on the western side of Willow Way. Public realm proposals are addressed within the Proof of Evidence by Jason Flanagan, Flanagan Lawrence [CD 5.8].

6. Response to Design Issues

6.1. Having carried out a review of the proposed design, in respect of the elements of the design which are pertinent to the issues raised by LBL in their Statement of Case[CD 5.4] , I provide bellow a response to those issues:

*“The applicant has not demonstrated an understanding or evaluation of the unique characteristics of the site”.*

6.2. The Design and Access Statement [CD 1.11] section 1 includes an analysis of the site and the surrounding context covering the following:

- Site location
- Existing buildings on the site and their use
- Site overview including annotation of local landmarks and significant features
- Historical maps
- Architectural context
- Mapping of current use mix
- Mapping of conservation areas and listed buildings
- Mapping of flood zone
- Mapping of green areas and protected trees
- Mapping of building heights and topography
- Mapping of transport analysis (PTAL and TIM)
- Site access including public transport network
- Existing traffic and parking (Map and Photos)
- Townscape views of importance (Views only submitted after the refusal)
- Local character analysis by way of site photos of buildings with close up images of the materials.

6.3. The site analysis covers the topics that are relevant to the site and the proposals, and in doing so the applicant *has* demonstrated an understanding and evaluation of the characteristics of the site. It is also evident from the Design Proposals that the analysis has informed the design, in a number of ways and in particular with regards to the layout, massing and materiality.

*The proposed architectural articulation is not informed by the local context nor does it set itself apart from it in a meaningful way; it is not distinctive.”*

- 6.4. As set out in the Design and Access Statement [CD 1.11] the existing buildings on site are of no architectural merit and this view is supported by the Officer's Report CD [2.2] paragraph 207.
- 6.5. The buildings surrounding the site are extremely varied in both architectural expression and in quality of design. With some exceptions the architectural articulation of the context is, in my view, not of a standard that merits being repeated without questioning. The existing buildings in the surrounding context which I would consider to have architectural articulation merit are for the most part Victorian. The proposed scheme does not attempt to replicate this expression in a residential / industrial collocation scheme, which would only result in a pastiche. Any reference to the context should therefore focus on other aspects such as layout, massing and materiality. As noted above these points have been considered in the design.
- 6.6. The proposed material pallet of red and yellow stock bricks clearly reflects the use of handlaid stockbricks in the surrounding area, including the use of two tones, and this reflects the observations made in the site analysis.
- 6.7. As to whether the scheme is sufficiently distinctive, I do believe this to be the case, when considering the location of the site, which is not on the high street and not prominent, and the overall quality of the architecture in the surrounding area, the reasons for which are set out in more detail below.

*"The residential character of the upper floors appears to have informed the architecture of the ground floor, whereas the requirement for the development to be employment-led would have this relationship reversed, with a stronger ground floor identity that anchors the scheme to the public realm."*

- 6.8. The proposed scheme is for a recent typology combining residential apartments and light industrial use, a typology for which the architectural expression does not have as many precedents as say residential only, or other mix of uses. The approach taken for the proposed scheme has been to develop a language unifying the two separate uses.
- 6.9. A series of large brick clad frames extending from the street to the parapet visually frame and join the industrial units with the residential units above. The frames suggest a regular structural grid, vertically expressed at every other floor thereby creating a double order. This is not, as suggested, a residential architecture, but rather an expression of workspace, typified by expressed structural grids and a requirement for large glazed areas.

- 6.10. At the residential floor levels, solid panels have been inserted into the brick frames in order to reduce the amount of glazing down to that appropriate for residential use, whilst maintaining the primary order of the brick frames. The panels are proposed in grey metal which, when seen against the brick frames, will appear recessive. Residential balconies have been set back behind the frames, so as to not protrude and proclaim the residential use. As such, visually the 'industrial' brick frames take precedent over the smaller residential scale. This is a further indication that the employment use is in fact the driver behind the design.
- 6.11. At ground floor level the elevation facing Willow Way presents wide, fully glazed double height bays. Once occupied the architecture allows for the activity in the workspace to be clearly visible to the public outside, creating a strong identity of the scheme as a place of employment, with the various activities inside on full display.

*“While the proposal is not offensive in terms of the architectural articulation, it does not provide adequate interest for its scale, and is not supported in design terms.”*

- 6.12. The Officers report includes a summary note from the Design Review Panel that they consider that *“The architectural expression is calm and well mannered”* [CD 2.2 paragraph 37]. So, the issue is whether the design is of sufficient 'interest'. The level of interest that a building should provide is matter opinion and should in any event take into account the proposed use as well as its location and context. As a place of work / living situated on a side street, and not a main public route, it is my view appropriate for the proposal to have a quiet demeanour, one which does not seek attention by excessive amount of detail. This is in contrast to what one might expect of a theatre in a public square. As illustrated by the elevations and the materials palette included in the Design and Access statement [CD 1.11], in the designing of the buildings, consideration *has* been given to proportions, materials and their detailing, and in my view sufficiently so as to provide a coherent whole with an appropriate level of architectural interest. Tall slender frames, elegant proportions, two types of brick providing contrast and distinguishing the mansion blocks from the recessed lower linking elements, with soldier courses to brick work and slender railings to balconies produces a quiet considered whole.

*A reduction in units, alongside an exercise in maximising plan efficiency could provide the opportunity to introduce more cut backs and openings between the front and back of the site, reinstating a relationship with the Sydenham Park Conservation Area.”*

6.13. As can be seen from the historical maps included in the Design and Access Statement [CD 1.11], when the roads were laid out between 1844 and 1865, the relation between Willow Way and Sydenham Park (originally named Albert Road) was one of back to back gardens with no physical link and very limited visual connection. The premise of the suggestion that the relationship should be reinstated is a false one. In any event it is not immediately apparent what benefit would be gained from such a relationship. Any attempt at this would also be hampered by position of the care home and associated car park on Shrubland Close between Willow Way and Sydenham Park, where several mature trees also reduce any potential visual connection.

*The proposed building form lacks coherence, with poor balance between solid/void, public/private, and commercial/residential use. The built form, in terms of scale, mass and bulk, is not supported in its current form.*

6.14. As follows from the Design Assessment above in this document, the design of the building has been approached in a logical manner. Building heights respond to the context and the heights of the individual elements within the site have a clear relationship between them. The building heights in turn have been considered together with the plan form, thus creating clearly defined building volumes within the overall massing. The regular brick clad frames on the façade have been employed as a device which orchestrates and unifies the building volumes as well as the uses. The result is one of a clearly legible building form and not as suggested one that lacks coherence.

6.15. Neither the Officers Report nor the LBL Statement of Case is clear as to what the issue is with the balance between solid and void. Proposals are for a high proportion of void (glazing) vs solid (brick) commensurate with a workspace architecture but also applicable to the residential element, when considering the strategy for a workplace driven architecture as set out in the design assessment above. In my view the void/solid ratio is appropriate to the co-location use and it works well architecturally.

6.16. The relationship between public and private is one of a building on private land and a public highway. The proposal provides an active frontage with large areas of glazing offering views into the building. It is noted that the proposals on Site A deliver no public realm, as it is proposed for this to be provided along the western side of Willow Way, as described in the outline masterplan. As set out above in this proof in the section on layout, positioning the building along the western edge is the correct approach, when taking into account site constraints and

the need to optimise the site. Urban realm proposals have been considered in the Proof of Evidence by Jason Flanagan, Flanagan Lawrence [CD 5.8] addressing masterplan issues.

6.17. Regarding the balance between the commercial and residential use, the architectural expression is one which seeks to unify the uses, as set out in the design assessment above, and does so successfully. The various parts of the elevations have been designed so as to produce a considered whole. At ground floor level, where residential entrances are located next to commercial uses, they are given an equal measure of importance. And more so than what is common on any high street where residential entrances are subordinate to commercial entrances.

## 7. Conclusion

7.1. I have carried out a design assessment of the urban design elements of the proposals, with emphasis on the issues raised in the second and fourth Reason for Refusal and as further detailed in the LBL Statement of Case.

7.2. In section 6 - Response to Design Issues within this proof I set out my opinion of the proposals relative to the issues raised based on which I conclude the following:

7.3. Within the design documents and in particular the Design and Access Statement [CD 1.11] and TVIA [CD 5.3.1] the applicant has demonstrated an analysis and understanding of the context, and through design proposals demonstrated how the context has informed the design.

7.4. The proposed layout, building height, and form has been informed by the context and is considered and appropriate for the site.

7.5. The urban design elements of the proposals are coherent, of high quality, and will make a positive contribution to the area.

7.6. Overall, the proposals provide an appropriate and high quality design solution. For the reasons explained in this proof of evidence, it is my professional opinion that there is no justification for refusing the proposed development on the urban design grounds set out in Refusal Reasons 2 and 4.

**Henrik Lonberg**

03 October 2023