



View 36 (Winter)  
Battersea Bridge  
2018 / Wireline  
Baseline





View 36 (Winter)  
Battersea Bridge  
2018 / Wireline  
Proposed





View 37 (Summer)  
Kensington Palace  
2018 / Render  
Baseline





View 37 (Summer)  
Kensington Palace  
2018 / Render  
Proposed





View 37 (Winter)  
Kensington Palace  
2018 / Render  
Baseline





View 37 (Winter)  
Kensington Palace  
2018 / Render  
Proposed



- 1.1
- This note provides additional clarificatory information on the ‘before and after’ images provided in the Townscape and Visual Impact Assessment (‘TVIA’) submitted with the planning application as part of the Environmental Statement, in the light of consultation responses which have suggested that the images give a misleading impression of what is proposed on the basis that the field of view of the images (which is a function of the camera lens used) is too wide (i.e. too ‘wide angle’).
- 1.2
- The images in the TVIA have a field of view that is standard for major projects in London: a 24mm lens giving a 74-degree horizontal field of view (HFOV). These criticisms are not new and have been raised in the context of TVIA images using the same field of view on other schemes (for being either too narrow or too wide a field of view). The criticisms (both that the field of view is too wide, and that it is too narrow) are unfounded, for reasons that are set out below.

Methodology For Verified View Images

- 1.3
- The verified before and after images were provided by Hayes Davidson (‘HD’) who are leading practitioners in this field. HD’s method statement (Appendix A of the TVIA) explains the choice of lens for the photographs (at paras. 4.2–4.4, p173) as follows:

4.2 There is no single definitive camera and lens format that is suitable for all planning photomontage work. Choices needs to be made with care and clearly explained through method statement / annotation. Townscape photography taken with a 40° lens (50mm lens / 35mm camera) is most often likely to be inadequate for purpose and is not recommended. To insist, as some do, that only 40° lenses should be used is unrealistic. If chosen appropriately, correctly annotated, and with professional understanding by those assessing, there is little to be lost by using wider angle lenses (up to 70°), as this can add peripheral information that more closely reflects our ‘experience’ of a scene.

4.3 Very wide angle single lens views can minimise impact and as such this technique is also inappropriate. Through a careful choice of lenses that allow wider fields of view, townscape is able to be better assessed. The use of hybrid lenses/photographic solutions (ref. Multi-Lens section 7.3) ensure that distortion issues can be minimised for panoramic images.

4.4 Hayes Davidson recommends that all parties are mindful that Environmental Statement photomontage should be used as a complement to site based assessment.
- 1.4
- It will be noted from this text that HD are familiar with the proposition that a narrower field of view should be used, and they give reasons for the lens size that is used.

TVIA Assessment Methodology

- 1.5
- The text of the TVIA sets out the method of the assessment, which is informed by the before and after images, at paras 1.45–1.90. Paragraphs 1.87–1.88 explain how the images inform the assessment:

1.87 The assessment of individual views, and the concluding section concerning impact on townscape, which is informed by the view assessments, considers the effect on the townscape and views as they will be experienced by viewers in reality. Photographic images of townscape are no more than an approximation to this, for a number of reasons:

- Viewers have peripheral vision; their view is not restricted by borders as a photograph is, and they can move their eyes and heads to take in a wide field of view when standing in one place;
  - Viewpoints themselves are not generally fixed. Townscape is experienced for the most part as a progression of views or vistas by people who are moving through streets or spaces rather than standing still;
  - Photographs do not reflect the perception of depth of field as experienced by the human viewer due to parallax;
  - Before and after views illustrate the view in conditions that are particular in respect of time of day and time of year, daylight and sunlight, and weather, and the view will appear differently to varying degrees when any or all of these things vary; and
  - Townscape is experienced not by the eye alone but by the interpretation by the mind of what the eye sees, considered in the light of experience, knowledge and memory.

1.88 The assessment represents a professional judgement of the effect of the Proposed Development on the view or the townscape, informed by site visits as well as the photographic images provided, rather than an assessment of the photographic images.

Landscape Institute Guidance

- 1.6
- Since the TVIA was submitted with the original planning application, the Landscape Institute (‘LI’) have produced revised guidance on visualisation techniques ‘Visual Representation of Development Proposals’ (September 2019). This replaced earlier LI advice notes ‘Photography and photomontage in landscape and visual impact assessment’ (2011) and ‘Visual Representation of Development Proposals’ (2017). The document was produced by and for landscape professionals, and draws extensively on work done by Scottish Natural Heritage in connection of the visualisation of wind farm proposals.
- 1.7
- The significant point in the guidance raised by consultees concerns the focal length of lens used, which determines the field of view of the resulting image. At 1.1.5 the guidance states that ‘a fixed 50mm lens is considered the benchmark for landscape technical photography’. At 1.1.7 the guidance says ‘If a 50mm FL lens cannot capture the view in landscape or portrait orientation (for example, if the highest point of the development is approaching 18° above horizontal) the use of wider-angled prime lenses should be considered, working through the following sequence of fixed lenses in this order: 35mm FL > 28mm FL > 24mm FL > 24mm FL Tilt-Shift. Tilt-Shift Lenses are considered at Appendix 13. In these unusual situations, the reasoning for the choice and the approach used should be documented, and the agreement of the competent authority should be sought (see Appendix 10 Technical Methodology).’



**Lens Size: Consideration**

- 1.8 Some consultees have suggested that a 50mm lens should have been used for the TVIA images. The images in the TVIA are all taken using a 24mm lens, i.e. the widest field of view envisaged in the LI guidance, and are therefore in conformity with the range of possible lens sized recommended by the latest LI guidance.
- 1.9 The LI guidance implies that the choice of a 24mm lens would be 'unusual'. It may be unusual for landscape photography, for example in the assessment of proposed wind turbines in open landscape, but it is standard for TVIA's in densely developed urban situations, where the visual considerations are completely different. As is stated in HD's method statement in the TVIA, the wider field of view gives peripheral information that more closely reflects our experience of a scene.
- 1.10 If you were to centrally crop into an image taken with a 24mm lens to the same horizontal field of view (HFOV) as a 50mm lens, the resulting image is identical to that produced by taking it directly with a 50mm lens. This is often misunderstood. An image with a 74 degree HFOV (24mm lens) is geometrically and perspectively identical to an image showing a HFOV of 40 degrees (50mm lens), but the 24mm lens gives more context to all sides.
- 1.11 This can be seen below in a representative example of a view image from the TVIA (view 04). The full image is the image from the TVIA. The superimposed orange rectangle shows the extent of a photo taken from the same place using a 50mm lens. Since the point of the TVIA is to examine the effect of the proposals in relation to the existing urban context, it is helpful to be able to see the greater extent of context that the 24mm lens allows.





Size Of Printed Images

- 1.12
- The question of the field of view of the image is separate from the question of the size at which the resulting image is presented. For any given printed photograph, there is a viewing distance (the distance between the image and the eye of the viewer) at which the size of the image is the same as the size of what one sees in reality. An image that matches this description is helpful for consideration on site, such that it can be held at arms length at an apparent size that matches the real world scene. If a document is to be held at arm’s length, an image made using a 24mm lens would need to be printed at a larger size than A3 to achieve this effect, which is not generally practical. For this reason, ‘true scale’ images, showing a crop of the full TVIA images are sometimes provided as a supplement to the TVIA, for use in on site assessment, and this was provided in the case of the Kensington Forum application. For viewing on site, the existing wider context information illustrated in the full image above is available to the viewer, so the fact that the image has been cropped does not result in any loss of understanding of context.
- 1.13
- In order to provide images that are exactly in compliance with what is specified in the 2019 LI guidance, a new document (‘Appendix 2 – Views for on-site assessment’ within the Townscape, Visual and Heritage Impact Assessment Addendum) has now been provided which has the TVIA images cropped to correspond to 50mm lens images. These images need to be held at arm’s length on site, to avoid the contextual information with which they are intended to be used being artificially excluded.
- 1.14
- It should be noted that when images are available digitally for examination on screen, as they have been available to consultees in this case and as is now normal practice, the image can be viewed at any size the viewer wishes, using the zoom function; so that one can zoom in on a 24mm lens image to emulate a 50mm (or any other size) lens image.

The Chiswick Curve Public Inquiry

- 1.15
- Criticisms of TVIA photography were discussed at public inquiry into the ‘Chiswick Curve’ scheme in 2018. The Inspector’s report (APP/F5540/W/17/3180962 and APP/F5540/Z/17/3173208, 19 July 2019) included the following which is relevant to the present case:  
  
*‘12.2 There is a need at the outset to deal with the strong criticisms made primarily by the Council about the appellant’s visual representations that are contained in the ES, and in evidence. In response to my questions, the Council confirmed that it was not seeking to suggest that the ES was inadequate for the purposes of the relevant Regulations. In that case, it must follow that the degree to which the appellant’s visualisations might be misleading cannot be significant.*  
  
*12.3 I took the criticism to be a suggestion that the appellant’s visual representations should be approached with caution. However, that is true of any visual representation. It is important to remember that illustrations of this type are only a guide for the eventual decision-maker; they are there to act as an aide-memoire, and to assist site visits. ‘*  
  
1.16 Similarly in the present case, it has not been suggested by RBKC or the GLA or HE that the ES was inadequate in relation to the images. The Inspector’s comments about illustrations being only a guide are along the same lines as the explanations in the TVIA methodology cited above.

Consideration and Conclusion

- 1.17
- It is sometimes suggested that photomontages images taken with a particular lens ‘are not what you would really see’, either because the field of view is too wide or because it is too narrow (both criticisms have been levelled at 24mm lens images in our experience). This is true, for the reasons given in the assessment methodology above. A photograph has borders, but in real life one can look around through 360 degrees. No photographic image shows ‘what you would really see’, for this reason and a number of other reasons set out in the methodology cited above. The verified photomontage images do however show, with complete and verifiable accuracy, what a photograph of the completed development, taken with the lens in question, would show.
- 1.18
- It is not unusual for consultees who are opposed to proposals to suggest that the images provided in TVIAs are misleading, and comments of this kind were made before the 2019 LI guidance was issued. In our professional opinion, the images provided in the TVIA are not misleading, for the reasons given above. They should be read with the plans, sections and elevations of a proposal, which of course define its dimensions, and as the Inspector in the inquiry decision cited above suggested, they should be used as a guide. In this case, because the proposed development is much the same height as the existing building on site, it is relatively easy to gauge the scale of what is proposed by looking at the as proposed images and comparing them either with the as existing photographs, or by looking at the existing building in situ. Criticisms that the way in which the project has been represented are misleading are therefore unfounded.