



Kensington Forum



Rockwell



Kensington Forum Hotel – London

ENVIRONMENTAL STATEMENT ADDENDUM | JULY 2020
TOWNSCAPE, VISUAL & HERITAGE IMPACT ASSESSMENT ADDENDUM | VOLUME 2

Kensington Forum

ES Volume 2 Addendum : Townscape, Visual and Heritage Impact Assessment Addendum

July 2020

INTRODUCTION

- 1.1
- A Townscape, Visual and Heritage Impact Assessment ('TVHIA') formed Volume 2 of an ES submitted for the Kensington Forum scheme (the Proposed Development) in June 2018. The TVHIA assessed the effect of the submitted Proposed Development on views and townscape character areas (Part 1 of the overall assessment), and above-ground built heritage assets (Part 2 of the overall assessment). It included 37 views of the Proposed Development.
- 1.2
- A number of design amendments were proposed for the scheme in 2019 ('Proposed Amendments'). A Townscape, Visual and Heritage Impact Assessment Addendum ('TVHIA Addendum') dated April 2019 assessed the potential impacts and likely effects of the Proposed Development as changed by the Proposed Amendments on views, townscape and above-ground heritage assets. This April 2019 TVHIA Addendum included 21 revised views (out of the total of 37) updated to reflect the Proposed Amendments (selected on the basis that they were the views in which the Proposed Amendments may be visible to a noticeable extent). It concluded that the Proposed Amendments would not result in any change to the assessments of the potential impacts and likely effects of the Proposed Development with respect to views, townscape, and above-ground built heritage as presented in the June 2018 TVHIA, and the residual effects set out in the June 2018 ES would remain valid.
- 1.3
- An updated set of documents for the GLA Stage 3 hearing is now required for the Kensington Forum scheme. The design of the scheme i.e. the Proposed Development remains as assessed in the April 2019 ES Addendum. This 2020 ES Addendum considers whether the Proposed Development would result in different effects compared to those previously assessed in light of any changes to the baseline context, planning policy and guidance, assessment methodologies and cumulative schemes. In respect of demolition and construction effects, as no change is proposed to the information set out in 'Chapter 5: Demolition and Construction' within the June 2018 ES, the effects at the demolition and construction stage on views, townscape and heritage would not change and they are not considered any further in this assessment as that presented in the June 2018 TVHIA remains valid.
- 1.4
- As the design of the Proposed Development has not changed, none of the previously provided views have been updated in respect to the appearance of the Proposed Development. However, following consultation with the RBKC two additional cumulative schemes have been considered within this 2020 ES Addendum. Therefore, a total of 19 cumulative views previously provided in the June 2018 ES (out of a total of 37) have been updated to reflect the additions to the cumulative schemes (cumulative views were not updated as part of the April 2019 TVHIA Addendum). These updated views were selected on the basis that they are the views in which the changes to the relevant cumulative schemes have the potential to be visible within the image. These revised views are provided in Appendix 1 at the end of this Addendum.

- 1.5
- In addition, and following consultation with the GLA, the opportunity has been taken to provide all 37 'as proposed' views in a format recommended by the revised Landscape Institute Technical Guidance Note 06/19, 'Visual Representation of Development Proposals' (which was published subsequent to the issuing of the April 2019 TVHIA Addendum, in September 2019). These versions of the views (Appendix 2 at the end of this TVHIA Addendum) provide what the LI Technical Guidance Note describes as a '100% reference image', and in each case present the equivalent of a photograph taken with a 50mm lens and are sized such that, when printed on an A3 sheet and held at a recommended viewing distance (at arm's length) from a viewer's eyes at the relevant viewing location, the image on the page would reconstruct the scale of the view as experienced in real life.
- 1.6
- The views in Appendix 2 are additional versions of the images contained in the 2018 TVHIA and April 2019 TVHIA Addendum, provided to reflect the revised format recommended for on-site visual assessment as set out in the updated 2019 LI Technical Guidance Note. They do not alter the assessment of the effects of the Proposed Development which, as noted at paragraph 1.88 of the June 2018 TVHIA, is a professional judgement of the effect of the Proposed Development on the view or townscape, informed by site visits as well as the photographic images provided, rather than an assessment of the photographic images themselves.
- 1.7
- The views presented in Appendices 1 and 2 are either versions of the views as presented in the June 2018 ES (in cases where the 2019 Proposed Amendments are not expected to result in any noticeable change to the visibility or appearance of the Proposed Development), or they are versions of the updated views presented in 2019. The version of the view used is indicated on each image.
- 1.8
- Appendix 3 provides additional information on the 'before and after' images provided in the TVHIA submitted in June 2018 in light of consultation comments, particularly in respect of the field of view of the images.
- 1.9
- This ES Addendum Volume should be read in conjunction with the June 2018 ES Volume 2 and April 2019 Addendum Volume 2.

PLANNING POLICY CONTEXT

- 1.10
- In respect of national planning policy, there have been no changes relevant to the TVHIA since the April 2019 TVHIA Addendum.
- 1.11
- In respect of national planning guidance, the national Planning Practice Guidance ('PPG') has been updated (October 2019) and a new National Design Guide has been issued (September 2019). The updated guidance in both is similar to that in the PPG as available at the time of the April 2019 TVHIA Addendum.
- 1.12
- Historic England has issued a further advice note 12 ('Statements of Heritage Significance: Analysing Significance in Heritage Assets, 2019') and a draft updated version of its advice note 4 ('Tall buildings – Second edition consultation draft, 2020') since the 2019 TVHIA Addendum. Both documents are in line with the guidance available at the time of the June 2018 TVHIA and April 2019 TVHIA Addendum.
- 1.13
- In respect of regional policy, the Mayor of London issued a further draft version of the new London Plan in December 2019 (Intend to Publish version). The draft policies most relevant to townscape, visual impact and the historic environment are broadly similar to those in the current London Plan and the draft London Plan (August 2018) considered in the June 2018 TVHIA and, in the latter case, the April 2019 TVHIA Addendum.
- 1.14
- In respect of Local policy, RBKC adopted a new Local Plan in September 2019. This includes all the main modifications recommended by the Local Plan Partial Review Planning Inspector and the Council's Minor and Additional Modifications, as well as all the extant policies and their supporting text from the Consolidated Local Plan 2015. As such, it is not significantly different to the 2015 Local Plan and Local Plan Partial Review draft policies considered in the 2018 TVHIA and April 2019 TVHIA Addendum.
- 1.15
- In conclusion, the changes to national, regional and local planning policy and guidance since April 2019 would have no different effect in respect of consideration of the townscape, visual and heritage effects of the Proposed Development.
- 1.16
- None of the updates summarised above affect the scope or assessment methodology for the TVHIA of the Proposed Development.

¹ Ministry of Housing, Communities and Local Government (2014 - ongoing), Planning Practice Guidance (www.gov.uk/mhclg)

² Ministry of Housing, Communities and Local Government (2019): National Design Guide (www.gov.uk/mhclg)

³ Historic England (2019): Historic Environment Good Practice Advice in Planning Note 12 – Statements of Heritage Significance: Analysing Significance in Heritage Assets, Historic England.

⁴ Historic England (2020): Historic England Advice Note 4 – Tall Buildings- second edition consultation. Historic England.

ASSESSMENT METHODOLOGY AND EFFECT SIGNIFICANCE CRITERIA

- 1.17 The assessment methodology set out in the June 2018 ES and April 2019 ES Addendum (inclusive of the study area, method of baseline characterisation, method of assessment, and significance criteria) remains valid for the Proposed Development.

BASELINE CONDITIONS

- 1.18 The Site has not changed since April 2019 and there have been no significant changes to the baseline conditions around it that would alter the effect of the Proposed Development compared to that set out in the June 2018 ES and April 2019 Addendum.

ASSESSMENT AND VIEWS

- 1.19 As the design of the Proposed Development has not changed since the April 2019 TVHIA Addendum, the potential impacts and likely effects of the Proposed Development (during demolition and construction and once completed and operational) as set out in the June 2018 TVHIA and April 2019 TVHIA Addendum in respect of views, townscape character areas and the settings of built heritage assets, would remain valid for the Proposed Development.

MITIGATION AND MONITORING

- 1.20 The effects of the completed Amended Proposed Development would remain beneficial or neutral, as set out in the June 2018 ES and April 2019 TVHIA Addendum. The conclusion of the June 2018 ES that no mitigation is required would therefore remain valid for the Proposed Development.

RESIDUAL EFFECTS AND CONCLUSIONS

- 1.21 In conclusion, there have been no changes since the application submission which would result in any change to the assessments of the potential impacts and likely effects of the Proposed Development with respect to views, townscape, and above-ground built heritage as presented in the June 2018 ES and April 2019 TVHIA Addendum. As no mitigation is required, the residual effects set out in the June 2018 TVHIA and confirmed by the April 2019 TVHIA Addendum would remain valid for the Proposed Development.
- 1.22 It is therefore considered that there would be no change to the conclusions reached within the June 2018 TVHIA and April 2019 TVHIA Addendum with regard to individual receptors, and the overall conclusions in the June 2018 TVHIA and April 2019 TVHIA Addendum on townscape, views and heritage remain valid for the Proposed Development.

CUMULATIVE EFFECTS ASSESSMENT

- 1.23 One of the cumulative schemes assessed in the June 2018 TVHIA (100 West Cromwell Road) has been amended since April 2019. In addition, one new cumulative scheme has come forward (Heythrop College). Those views that have the potential to be affected by these amended or new cumulative schemes have been updated and are attached as Appendix 1.
- 1.24 The site for the 100 West Cromwell Road cumulative scheme lies over 1km from the Site of the Proposed Development, with dense urban development in between them. There was no visibility of the 100 WCR scheme in any of the cumulative views assessed in the 2018 TVHIA. The updated views in Appendix 1 demonstrate that the revised scheme for 100 WCR would remain invisible in the assessed views. It would therefore still be the case that there would be no significant cumulative effect between the revised 100 West Cromwell Road scheme and the Proposed Development in townscape, visual or heritage terms, as set out in the 2018 TVHIA.
- 1.25 The site for the Heythrop College scheme lies approximately 650m north of the Site of the Proposed Development, with dense urban development in between them. The updated views in Appendix 1 demonstrate that this additional scheme would not be visible in the assessed views. There would be no significant cumulative effect between the Heythrop College scheme and the Proposed Development in townscape, visual or heritage terms, and the assessment of cumulative effects set out in the 2018 TVHIA remains valid.
- 1.26 Informed by consideration of these updated views, it is considered that the effects of the Proposed Development in the cumulative scenario would remain as set out in the June 2018 ES.