

This note has been prepared in response to the letter from Historic England, dated 31 January 2022, regarding the application for planning permission at Murphy's Yard.

Impact on views

The Historic England letter noted that, in their opinion, the proposed development would affect strategic views of central London from Parliament Hill, and concluded that the impact would be *'significant, blocking and diminishing the impact of, views of key parts of central London from a number of angles on Parliament Hill'*.

It should be noted that Historic England do not suggest that there is any harm caused to any heritage assets or their settings as a result of the impact on these views.

Views 25, 26, 27 and 28 in the TVIA assess the impact of the proposed development from Parliament Hill. View 26 is taken from LVMF viewpoint 2A.1 and view 28 is taken from LVMF viewpoint 2B.1. View 27 was included to illustrate maximum visibility towards the site from the summit. The TVIA assessed that the proposed development would have a neutral (in the case of view 26) or beneficial (in the case of views 25, 27 and 28) effect on the views from these points on Parliament Hill, acting as a marker for a new neighbourhood and adding to the varied layers of development seen in the middleground of the views. Indeed, in years to come the proposed development would simply be seen as an established layer in this already varied view over London, and would cement Kentish Town as a neighbourhood with visual and physical connections with the Heath. These views are from fixed points on Parliament Hill – the panorama of London is seen as a dynamic view as one moves around the summit, with different elements coming into and out of view in conjunction with other development and the dense tree planting in the foreground. The proposed development would, in some views from points in this area, screen parts of the City cluster from view, as noted in the TVIA. It would not impact views of St Paul's Cathedral or the Palace of Westminster, which these LVMF views seek to protect. It is our assessment that the proposed development would not harm this dynamic view of London from Parliament Hill.

On the view from Kentish Town Station (as identified in the Kentish Town Neighbourhood Plan), Historic England conclude that the impact of the proposed development would be *'significantly harmful, blocking most of the views of the hills that are the reason for its protection in Camden's Local Plan'*. (It should be noted that this view is protected in the Kentish Town Neighbourhood Plan, not Camden's Local Plan).

It should be noted that Historic England do not suggest that there is any harm caused to any heritage assets or their settings as a result of the impact on this view.

Views 12a and 12b in the TVIA assess the impact on views from Kentish Town Station. They are, as all views are, from fixed points in the townscape which would, in reality, be one point of a dynamic view sequence that one would experience when moving through the area. The assessment of these views in the TVIA is that the proposed development would have a beneficial effect, due to the

improved legibility and permeability between Kentish Town and the Heath (with the Heath and the route to it being clearly visible from this point). It would result in a focused view of the Heath through the gap in the buildings, and would improve the view through providing a backdrop of high quality buildings which would enhance the sense of place in the area.

Focal length

The note below 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').

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

The verified before and after images were provided by AVR London who are leading practitioners in this field. AVR's method statement (Appendix B of the TVIA) explains the choice of lens for the photographs (at paras. 1.8-1.9, p.152) as follows:

Regarding 24mm focal length in an urban environment

1.8 When we observe a scene, we can focus on 6-10 degrees, however, without moving our head, the scene beyond is observed using our peripheral vision. Once we move our eyes we can observe almost 180 degrees without moving our head. In reality we do not view the world through one fixed position, we move our eyes around a scene and observe, height, width and depth.

This is acknowledged by the Landscape Institute's Technical Guidance Note, Visual Representation of Development Proposals. The appreciation of the wider context seen through peripheral vision or by moving our eyes (changing the focal point) is key to our experience of a scene.

While photography cannot replicate the human experience entirely, it is widely acknowledged that the use of a 24mm lens in an urban environment allows the viewer a more realistic experience than a 50mm lens. For this reason the 24mm lens is used as standard in the creation of urban photo montage as outlined by the London View Management Framework (2012).

50mm Lens/Crop

1.9 It should also be stressed that if you were to centrally crop into an image taken with a 24mm lens to the same HFOV as a 50mm lens, the resulting image is identical to that produced by taking it directly with a 50mm lens. An image with a 69 degree HFOV (24mm lens) is geometrically and perspectively identical to an image showing a HFOV of 40 degrees (50mm lens), the 24mm lens purely gives more context to all sides (Fig 01). Further, all of our images allow this 50mm equivalent HFOV to be seen, read and understood on the image itself. The reader and in particular an experienced inspector can then make a judgment with the benefit of both fields of view.

It will be noted from this text that AVR 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

The text of the TVIA sets out the method of the assessment, which is informed by the before and after images, at Section 3. Paragraphs 3.48-3.50 explain how the images inform the assessment:

3.48 The assessment of individual views, and the concluding section concerning impact on townscape, which is informed by the view assessments, has considered the effect on the townscape and views as they would 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.*

3.49 The 'as proposed' images are provided as a guide to the effect on views as they would be experienced on site; to act as an aide-memoire; and to assist site visits. The assessment provided in this Townscape and Visual Impact Assessment ('TVIA') represents a professional judgement of the likely 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.

3.50 The general conclusions about the effect of the Proposed Development on the townscape considered in the round should also be taken into account when considering individual views.

Lens size: consideration

Historic England 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 sizes recommended by the latest LI guidance.

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 AVR's method statement in the TVIA, the wider field of view gives peripheral information that more closely reflects our experience of a scene.

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.

It is also worth noting that there is a strong case for using a consistent lens size throughout the TVIA images rather than some images using a 'zoomed in' 50mm lens and others a 24mm lens. By using a consistent lens size throughout, it is easier for the reader to judge a proposal's impact on all views across the board.

Size of printed images

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 arm's 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 Murphy's Yard 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.

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

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.'

Similarly in the present case, it has not been suggested by LBC or the GLA 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

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.

It is not unusual for consultees who are opposed to proposals to suggest that the images provided in TVIAs are misleading. 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. Criticisms that the way in which the project has been represented are misleading are therefore unfounded.