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Townscape and Visual Impact Assessment

June 2023

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1 Introduction

- 1.1 This Townscape and Visual Impact Assessment (TVIA) has been prepared by Tavernor Consultancy Ltd ('Tavernor Consultancy') on behalf of Notting Hill Gate KCS Limited ('the Applicant') in support of an application for full planning permission for Land at 43-45 and 39-41 Notting Hill Gate and 161-237 (odd) Kensington Church Street, London, W11 3LQ ('the Site') within the Royal Borough of Kensington and Chelsea ('RBKC').
- The description of development for the scheme on the Site as submitted for planning permission (the 'Proposed Development') is as follows:
 - "Partial retention, refurbishment and extension of the Newcombe House tower for continued office use (Class E(g)(i)), the full demolition of the rest of the site comprising existing retail (Class E) and housing (Class C3) uses and surface level car park, and redevelopment to provide retail use (Class E) at ground floor and office use (Class E(g)(i)) at the upper floors, housing (Class C3) and a medical centre (Class E (e)), in new buildings ranging from 6-15 storeys with double basement, and public realm works and other ancillary works (MAJOR DEVELOPMENT)."
- 1.3 A previous scheme for the Site was granted planning permission by the Secretary of State in June 2020; this proposed six buildings with a maximum height of ground plus 17 storeys. A set of views comparing the consented scheme with the Proposed Development has been provided as Appendix C.
- 1.4 Full details and scope of the current planning application are described in the submitted Planning Statement, prepared by Gerald Eve.
- The TVIA assesses the potential effects of the Proposed Development on a range of views and on the character of the local and wider townscape. It considers heritage assets in so far as they contribute to the character and sensitivity of townscape and views but does not consider the effect of the Proposed Development on the significance of heritage assets; for this assessment on significance, reference should be made to the Heritage Statement prepared by MOLA.
- The assessment of townscape and views is based on architectural drawings by the architects Squire and Partners, which form part of the planning application, and Accurate Visual Representations (AVRs, also known as verified views) by Miller Hare, which are included in the views assessment in Section 6 of this report.
- 1.7 This document considers potential changes to:
 - The character of the townscape on and surrounding the Site; and

- The composition of relevant protected views and selected representative views as a result of the Proposed Development.
- The potential impacts of the Proposed Development are considered through the assessment of 27 verified views, the locations of which were agreed in consultation with RBKC to enable an assessment of the visual impacts of the scheme in the round. Photographs of the views are overlaid with accurately surveyed and verified detailed representations of the Proposed Development shown as either a wireline or a fully rendered image. A further nine non-verified supplementary computer model views, in which there is no or very low visibility of the Proposed Development, are included in Appendix A for information only and have not been individually assessed.
- 1.9 Additionally, non-verified illustrative views are included in the Design and Access Statement (DAS) produced by the architects of the Proposed Development, Squire and Partners, which should be read in conjunction with this report.
- 1.10 The following Sections 2-5 set out the relevant planning policy, methodology, the existing conditions on and around the Site and relevant visual characteristics of the Proposed Development that form the basis for the assessment within Section 6. The conclusions are set out in Section 7.

Legislation and Planning Policy Context

Legislation

Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended) (Ref 1-1)

- Most of the principles that should be adhered to when determining planning applications that affect the historic environment are set out in policy and guidance. However, local planning authorities must also comply with important statutory duties when weighing the planning balance, as set out within the Planning (Listed Buildings and Conservation Areas) Act 1990 (the "Act"). The principle statutory tests of relevance within the Act are as follows:
 - (a) Section 66(1) states that "in considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State, shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses": and
 - (b) Section 72(1) states that "in the exercise, with respect to any buildings or other land in a conservation area, of any of the provisions mentioned in subsection (2), special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area." Sub-section (2) explains that the provisions referred to within subsection (1) include the Planning Acts.

National Planning Policy and Guidance

National Planning Policy Framework (NPPF) (2021) (Ref 1-2) The National Planning Policy Framework (NPPF) sets out the Government's overarching planning policies on the delivery of sustainable development through the planning system.

- The NPPF identifies three dimensions to sustainable development: economic, social and environmental (Ref 1-2, para 8). It notes the key role of planning in the creation of sustainable communities: communities that will stand the test of time, where people want to live, and which will enable people to meet their aspirations and potential. At the heart of the Framework is "a presumption in favour of sustainable development" (Ref 1-2, para 10). However, "The presumption in favour of sustainable development does not change the statutory status of the development plan as the starting point for decision-making." (Ref 1-2, para 12).
- 2.4 Chapter 12 of the NPPF is entitled 'Achieving well-designed places'. Paragraph 130 of the NPPF notes that "Planning policies and decisions should ensure that developments:
 - a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;

- b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;
- c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);
- d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;
- e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and
- f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience."
- Paragraph 134 of the NPPF states that "Development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes. Conversely, significant weight should be given to:
 - a) development which reflects local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design quides and codes; and/or
 - b) outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings."
- Policy and guidance relating to conservation and enhancement of the historic environment is set out in Chapter 16 of the NPPF.
- The NPPF sets out the Government's overarching planning policies put in place to conserve the historic environment and its heritage assets so that they may be enjoyed by this and future generations. It gives guidance relating to designated heritage assets listed buildings, conservation areas, World Heritage Sites (WHS) and Registered Parks and Gardens (RPGs) and undesignated heritage assets, buildings positively identified as having a degree of heritage significance meriting consideration during the planning process, such as locally listed buildings.

- In order to assess the nature and degree of likely impacts on the significance of heritage assets, the NPPF requires "an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance." (Ref 1-2, para. 194)
- The NPPF Glossary (Annex 2) defines 'significance' (for heritage policy) as "the value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting." (Ref 1-2, p. 73) The significance of relevant heritage assets is described in Section 4.
- 2.10 When determining applications, the NPPF requires Local Planning Authorities to account for:
 - "the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
 - The positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
 - The desirability of new development making a positive contribution to local character and distinctiveness." (Ref 1-2, para. 197).
- weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be)." (para. 199). Paragraph 200 notes that heritage signifi-cance can be harmed or lost through alteration or destruction, or from development within its setting. Any harm to, or loss of, the significance of a designated heritage asset should require clear and convincing justification. It further notes that substantial harm to or loss of grade II listed buildings, or grade II registered parks or gardens, should be "exceptional" and for assets of the highest significance, including grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be "wholly exceptional."
- 2.12 Less than substantial harm to the significance of a designated heritage asset "should be weighed against the public benefits of the proposal" (Ref 1-2, para. 202). Substantial harm to significance will be permitted when the harm enables the proposed development to provide "substantial public benefits that outweigh that harm or loss" (Ref 1-2, para 201) or all of the following criteria apply:
 - "the nature of the heritage asset prevents all reasonable uses of the site; and

- no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and
- conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible;
- the harm or loss is outweighed by the benefit of bringing the site back into use."
- When considering proposals for development within a conservation area, WHS or setting of a heritage asset, Local Planning Authorities are required to seek opportunities for enhancement and to treat favourably proposals which "preserve those elements of the setting that make a positive contribution to or better reveal the significance of the asset" (Ref 1-2, para. 206).

Planning Practice Guidance (PPG) (First published March 2014; thereafter continuously updated) (Ref 1-3)

- The PPG, published by the Department for Levelling Up, Housing and Communities ('DLUHC'), is a frequently updated online resource providing guidance on implementing the policies of the NPPF (Ref 1-2). The web resource replaces various guidance documents, including By Design (2000). The section of the PPG that is of particular relevance to this assessment is:
 - 'Design: process and tools';
- The PPG on Design, which supports section 12 of the NPPF (Ref 1-2), states that local planning authorities are required to take design into consideration, stating that: "where the design of a development accords with clear expectations in plan policies, design should not be used by the decision-maker as a valid reason to object to development." It goes on to state that good design is set out in the National Design Guide under the following 10 characteristics (Paragraph: 001 Reference ID: 26-001-20191001):
 - context
 - identity
 - built form
 - movement
 - nature
 - public spaces
 - uses
 - homes and buildings

- resources
- lifespan

National Design Guide (2021) (Ref 1-4)

- First published in October 2019 by the then Ministry of Housing, Communities and Local Government (now DLUHC), and updated in March 2021, the National Design Guide (NDG) sets out the characteristics of well-designed places and demonstrates what good design means in practice. It forms part of the government's collection of planning practice guidance and should be read alongside the separate Planning Practice Guidance (PPG) on 'Design: process and tools' (Ref 1-4). The guidance is intended to support the NPPF (Ref 1-4) which sets out that achieving high quality places and buildings is fundamental to the planning and development process. The NDG outlines the Government's priorities for well-designed places in the form of ten characteristics. The quidance states that: "In a well-designed place, an integrated design process brings the ten characteristics together in a mutually supporting way. They interact to create an overall character of place" (Ref 1-4, pg. 4).
- 2.17 The NDG outlines the key components of good design, including: layout; form; scale; appearance; landscape; materials; and detailing. The document states that: "All developments are made up of these components put together in a particular way. The choices made in the design process contribute towards achieving the ten characteristics and shape the character of a place." (Ref 1-4, pq. 5).
- The ten characteristics that contribute towards well-designed places and are intended to foster local character, community and be sensitive to climate change, are outlined as:
 - context enhances the surroundings.
 - identity attractive and distinctive.
 - built form a coherent pattern of development.
 - movement accessible and easy to move around.
 - nature enhanced and optimised.
 - public spaces safe, social and inclusive.
 - uses mixed and integrated.
 - homes and buildings functional, healthy and sustainable.
 - Resources efficient and resilient.
 - Lifespan made to last.

- 2.19 Each of these ten characteristics are described in detail in Part2 of the NDG and each heading includes two or three policy directions and a number of good practice examples.
- 2.20 Within 'Context' and 'Identity', the guidance emphasises the importance of understanding place, noting that new development should respond positively to the site itself and its local and wider context. The NDG further highlights the importance of understanding the history of how a place has evolved, noting that well-designed places and buildings are influenced positively by the significance and setting of heritage assets and any other specific features that merit conserving and enhancing.
 - Historic England Advice Note 4: Tall Buildings (2022) (Ref 1-5)
- This guidance updates the first edition of Advice Note 4, published in 2015, in light of changes to national planning policy and guidance and HE's recent experience of planning for tall buildings in the historic environment. The advice notes that "tall building proposals that take account of the historic environment and are designed to avoid or effectively mitigate harm to it, would constitute sustainable development in heritage terms" (Para.2.2). It recognises that "Good design can ensure that tall buildings respond positively to the character of the surrounding area and the historic environment and can be used creatively to achieve sustainable outcomes." (Para.2.7), "In the right locations tall buildings can support major change or regeneration while positively influencing place-shaping and conserving the historic environment" (Para.3.1). However, "If a tall building is not in the right place, by virtue of its size and widespread visibility, it can seriously harm the qualities that people value about a place. There will be locations where the existing qualities of place are so distinctive and the level of significance of heritage assets so great that tall buildings will be too harmful, regardless of the perceived quality of the proposal's design and architecture." (Para.3.2)
- 2.22 The guidance does not define a tall building, stating that the London Plan (Ref 1-6) requires boroughs to define what is tall based on local context and, for situations where there is not possible, there is a minimum threshold that can be applied contained in London Plan Policy D9.
- 2.23 Section 4 provides a list of the factors that should inform the approach to tall building design:
 - 1. The response to local context: this includes considering how the tall building relates to its neighbours. It is helpful to consider the relationship between the top, middle, and base of a tall building with its neighbours and the potential impact on streetscape and skyline. There may be opportunities to improve local character through design.

- 2. The impact on the local environment: the experience of local character and the historic environment can be affected by micro-climatic factors such as wind and overshadowing. In some cases, this has the potential to impact the physical fabric of heritage assets.
- 3. Architectural quality: consideration can be given to whether a distinctive landmark design or a restrained architectural response is more appropriate. High-quality tall buildings are designed 'in the round' to be coherent from all directions taking account of scale, form, massing, proportions, silhouette, façade materials and detailed surface design.
- 4. Functional design: façade treatment and finishes, external lighting, placement of plant and servicing are all important considerations. The design of tall buildings should reflect or reference local street-based qualities, such as active frontages and human scale design at street level.
- 5. Sustainable design and construction: opportunities to enhance the appearance of an area and reduce harm to the historic environment through the re-development or retrofit of a tall building can be explored.
- 6. A well-designed inclusive environment: tall buildings can have a significant impact on the historic streetscape and public realm. In some cases, redevelopments may create opportunities to enhance elements of the significance of heritage assets by opening lost views or revealing historic street patterns.
- 2.24 The guidance describes the distinction between setting and views:
 - "Setting is more comprehensive and can include contextual elements which deal with the relationship of an asset to its surroundings both in the present and in the past. This includes the way a heritage asset or place is experienced and perceived today."
 - **Views** are a more defined element of setting, and not every heritage asset will have significant views associated with it. Nonetheless, views can make a vital contribution to the setting of heritage assets and constitute part of an asset's significance, for example Liverpool's Cathedrals, Oxford's 'dreaming spires' or London's protected views of St Paul's Cathedral, the Palace of Westminster and the Tower of London." (Para.4.8)
 - The guidance describes the benefits of planned tall building clusters: "Establishing a consolidated form of tall buildings as a cluster can bring some benefits if it is well-defined, well-designed, integrated, and managed. Without careful consideration and long-term management there is a risk that the cluster could sprawl. If appropriately managed as

- an integrated whole, clusters can deliver high densities while minimising cumulative impacts that may be harmful to the historic environment." (Para.4.16)
- 2.26 In Section 5, the guidance notes the importance of visualisations in helping to communicate the proposed appearance of new developments and aiding the assessment of built heritage impacts. It notes that visualisations should reflect human experience in the selection of an appropriate eve height, viewing position and camera lens, with views showing different seasons, weather conditions and times of day. It notes that Zones of Visual Influence (ZVI) are a useful initial tool for understanding the potential impact of a tall building and selecting viewpoints. Fixed views from a defined single point are considered helpful for considering the impacts on design views or those identified in development plans and conservation appraisals. Kinetic or dynamic views allow a more experiential representation of potential impacts which may better reflect the experience of heritage assets and their settings.
 - The guidance recognises that in some circumstances potential impacts on the historic environment may occur, which can be reduced through mitigation measures including:
 - "Locating taller elements of a development on less sensitive parts of a site, by carefully considering layout;
 - Creating a human scale experience by setting tall buildings back from the street and/or ensuring that the base of the tall building enhances or better reveals heritage assets, historic street patterns and spaces;
 - Designing the tall building to be sympathetic within the local context using materials, massing, and discrete or subtle architectural and functional features;
 - Minimising the bulk of tall buildings, especially at their tops, to help reduce the overall perception of mass; and
 - Designing the tall building to take account of the profile and silhouette of a cluster, and prominence of the cluster within the historic town or cityscape."
- 2.28 The guidance recommends that LPAs to consider cumulative impacts of tall building proposals with other existing tall buildings, to ensure that:
 - "Where harm already exists, it is not compounded;
 - The positive relationships that exist between existing tall buildings and the wider area are not compromised by new tall buildings; and
 - Legibility does not become confused and tall landmarks do not begin to compete." (para 6.5)

Regional Planning Policy and Guidance

The London Plan 2021: Spatial Development Strategy for Greater London (March 2021) (Ref 1-6)

2.29 The London Plan 2021 was formally published by the Mayor on 2 March 2021 and replaces the earlier version of the London Plan. The London Plan is the overall strategic plan for London, which sets out the economic, environmental, transport and social framework for development over the next 20-25 years. The Plan continues the GLA's support of high-quality design which relates successfully to its context. The following policies are relevant to this assessment and relevant elements of their content are summarised below:

Chapter 3 Design:

- Policy D1 London's form, character and capacity for growth
- Policy D3 Optimising site capacity through the designled approach
- Policy D4 Delivering good design
- Policy D8 Public realm

Chapter 7 Heritage and Culture:

- Policy HC3 Strategic and Local Views
- Policy HC4 London View Management Framework
- 2.30 Policy D1 London's form, character and capacity for growth notes that Boroughs should undertake area assessments to define the characteristics, qualities and value of different places within the plan area. This includes assessment of urban form and structure (for example townscape, block pattern, urban grain, extent of frontages, building heights and density), historical evolution and heritage assets (including an assessment of their significance and contribution to local character, views and landmarks.
 - Policy D3 Optimising site capacity through the designled approach notes that development proposals should "enhance local context by delivering buildings and spaces that positively respond to local distinctiveness through their layout, orientation, scale, appearance and shape, with due regard to existing and emerging street hierarchy, building types, forms and proportions." The policy further outlines that development should be of high architectural quality and "should respond to the existing character of a place by identifying the special and valued features and characteristics that are unique to the locality and respect, enhance and utilise the heritage assets and architectural features that contribute towards the local character."

Policy D4 Delivering good design states that "Where appropriate, visual, environmental and movement modelling/ assessments should be undertaken to analyse potential design options for an area, site or development proposal." It further states that "Design review panels should be used to assess and inform design options early in the planning process. Development proposals referable to the Mayor must have undergone at least one design review early on in their preparation before a planning application is made, if they include a residential component that exceeds 350 units per hectare or propose a building defined as a tall building by the borough or one that is more than 30m in height where there is no local tall building definition." Policy D4 further outlines that it is important that the design quality of development should be retained through to completion.

Policy D8 Public realm states that development proposals should "encourage and explore opportunities to create new public realm where appropriate", and "ensure the public realm is well-designed, safe, accessible, inclusive, attractive, well-connected, related to the local and historic context, and easy to understand, service and maintain." The public realm should be seen as a series of connected routes and spaces that help to define the character of a place. Its design should be based on an understanding of how the public realm in an area functions and creates a sense of place.

Policy HC3 Strategic and Local Views outlines a list of designated Strategic Views and states that "Development proposals must be assessed for their impact on a designated view if they fall within the foreground, middle ground or background of that view." Part C of the policy notes that the Mayor will "seek to protect vistas towards Strategically-Important Landmarks by designating landmark viewing corridors and wider setting consultation areas. These elements together form a Protected Vista. Each element of the vista will require a level of management appropriate to its potential impact on the viewer's ability to recognise and appreciate the Strategically-Important Landmark." Part G of Policy HC3 states that boroughs should clearly identify important local views in their Local Plans and strategies; it states that local views should be protected and managed in a similar manner as Strategic Views.

Policy HC4 London View Management Framework relates specifically to London's designated Strategic Views. The Site does not fall within any Protected Vistas, and no LVMF views are considered relevant to development on the Site at the scale proposed.

London View Management Framework Supplementary Planning Guidance (LVMF SPG) (March 2012) (Ref 1-7)

The LVMF SPG was last updated and published in March 2012. It was created to provide additional clarity and detail to the sections of The London Plan (Ref 1-6) that deal with the management of important London views.

2.37 The LVMF SPG includes thirteen Protected Vistas — of St Paul's Cathedral, the Palace of Westminster and the Tower of London. The Protected Vistas are geometrically defined and place additional consultation and referral requirements on development which exceeds the defined threshold plane. The Protected Vistas are included within views from a total of twenty-seven Viewing Places identified in the LVMF SPG. The views are separated into four categories 'London Panoramas', 'River Prospects', 'Townscape Views' and 'Linear Views'. All of the views in the LVMF SPG are subject to Qualitative Visual Assessment, as outlined in the Management Plan for each designated view provided in the Framework.

The Site does not fall within any Protected Vistas, and no LVMF views are considered relevant to development on the Site at the scale proposed.

Local Planning Policy and Guidance – Royal Borough of Kensington and Chelsea

Royal Borough of Kensington and Chelsea Revised Local Plan (September 2019) (Ref 1-8)

The Revised Local Plan (RLP) was adopted on 11 September 2019 and sets out the vision, objectives and detailed spatial strategy for future development in the Royal Borough up to 2028 along with specific strategic policies and targets, development management policies and site allocations. The RLP was prepared as a "Partial Review" of the Consolidated Local Plan (CLP) (July 2015), and incorporates both the "main modifications" recommended by the Inspector, and the "minor/additional" modifications published by the Council into the Local Plan Partial Review (LPPR) Publication Policies (2017). The following policies (which were carried over from the CLP to the RLP) are relevant to this TVIA:

- CL1 Context and character;
- CL2 New buildings, extensions and modifications to existing buildings;
- CL8 Existing Buildings Roof Alterations/ Additional Storeys;
- CL10 Shopfronts;
- CL11 Views; and
- CL12 Building Heights.

Also relevant is:

- CR5 Parks, Gardens, Open Spaces and Waterways
- 2.40 Policy CL1 Context and Character requires all development to respect the existing context, character and appearance, taking opportunities available to improve the quality and character of buildings and the area and the way it functions.

- Policy CL2 Design Quality requires all development to be of the highest architectural and urban design quality, taking opportunities to improve the quality and character of buildings and the area and the way it functions.
- Policy CL8 Existing Buildings Roof Alterations/ Additional Storeys requires roof alterations and additional storeys to be architecturally sympathetic to the age and character of the building and group of buildings.
- Policy CL10 Shopfronts requires shopfronts to relate well to the buildings above and to either side to provide an attractive setting for the display of goods and to drive up the quality of the area.
- Policy CL11 Views states that the Council will require all development to protect and enhance views, vistas, gaps and the skyline that contribute to the character and quality of the
- Key views were selected and tested as part of the planning process and confirmed as appropriate by RBKC officers.
- 2.46 Policy CL12 Building Heights states that:

"The Council will require new buildings to respect the setting of the borough's valued townscapes and land-scapes, through appropriate building heights.

To deliver this the Council will:

- a. require proposals to strengthen our traditional townscape in terms of building heights and roofscape by requiring developments to:
- i. reflect the prevailing building heights within the context;
- ii. provide, for larger developments, a roofscape that reflects that of the context of the site;
- iii. seldom use height to express local landmarks so the prevailing building height is maintained;
- b. resist buildings significantly taller than the surrounding townscape other than in exceptionally rare circumstances, where the development has a wholly positive impact on the character and quality of the townscape [...]".
- 2.47 The narrative accompanying the policy states:

"Buildings that rise above the prevailing building height are successful where, depending on their impact, they give meaning to the local or borough townscape, highlighting locations or activities of public importance" (page 202, para 34.3.101).

CR5 Parks, Gardens, Open Spaces and Waterways states that the Council will protect, enhance and make the most of existing parks, gardens and open spaces, and require new high quality outdoor spaces to be provided. The Council will (amongst others) resist development that has an adverse effect upon the environmental and open character, appearance and function of conservation areas and sites on the Register of Parks and Gardens of Special Historic Interest in England, or their setting.

2.49 Policy CV11 Vision for Notting Hill Gate in 2028 states that Notting Hill Gate "will have strengthened its distinct identity as one of the Borough's main district centres...Opportunities set out in the Notting Hill Gate Supplementary Planning Document will have been taken to refurbish or redevelop outdated 50s buildings" (p98).

2.50 The supporting text to this policy notes that "The town centre was comprehensively redeveloped in the 1950s and is of completely different scale and character to the surrounding residential areas. Many have now deteriorated. Together with the vehicle dominance, this does not form a very attractive or welcoming arrival point to Portobello Road" (p98, para 11.2). It goes on to note that the SPD for Notting Hill Gate identified specific opportunities for development, refurbishment or some additional storeys on seven sites, including that of Newcombe House (p100, para 11.5).

Royal Borough of Kensington and Chelsea – New Local Plan Review Publication, Secretary of State submission, February 2023 (Ref 1-9)

RBKC are undertaking a New Local Plan Review (NLPR) and, following public consultation, the NLPR was submitted to the Secretary of State in February 2023. The policies in the NLPR covering the design quality of new development and the historic environment are generally similar to those in the Local Plan 2019. The most significantly changed draft policies of potential relevance to the Proposed Development are considered below.

2.52 Draft Policy CD7: Tall Buildings states that tall buildings are considered to be those buildings over 21m or 30m, depending on where they are in the Borough as shown on Figure 4.3 (p122). The Site lies in an area where the 30m criteria applies. The Policy goes on to state that such proposals will be assessed in accordance with London Plan Policy D9, and that tall buildings will only be acceptable within those locations identified as suitable for them, as shown in Figure 4.4 (p124); the Site is identified as an area suitable for tall buildings (SA10), with a maximum height of 72m/ 18 storeys possible. It goes on to state that the Council "...will expect tall buildings to be of exemplary design quality..." including being "...well-integrated, at street level, with surrounding buildings and the streetscene" and using "materials are robust, fitting in their context..." (p120).

2.53 Draft Policy CD14: Views identifies key views within the Borough. These include Panorama 1, a panorama of Kensington Gardens and Hyde Park from east of the Round Pond and, of particular relevance to the Site, Townscape View T1, the view of Kensington Palace from the east across the Round Pond. These replicate view locations previously identified in the RBKC Building Heights study (see below). A view from the east of the Round Pond towards Kensington Palace from this location is provided as View A2 in the Appendix A of this Townscape and Visual Impact Assessment, and Views A1, A3, A4, A5 and A6 provide views from other points within Kensington Gardens.

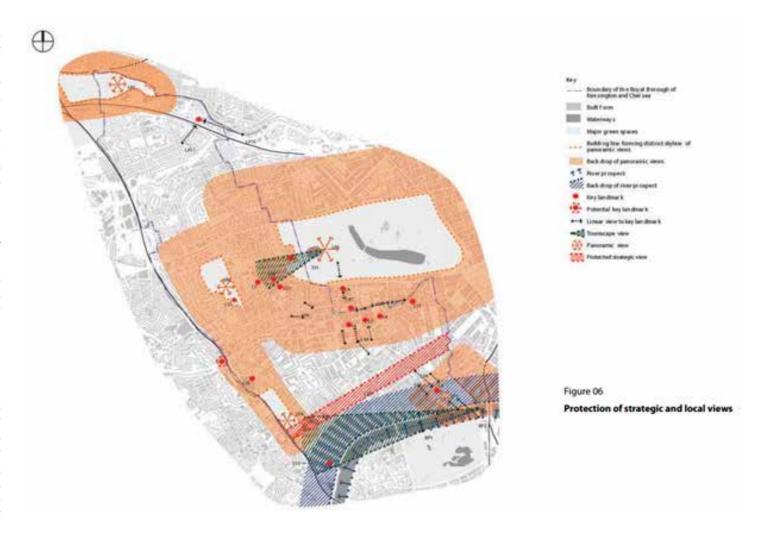
RBKC, Building Height in the Royal Borough SPD (September 2010) (Ref 1-10)

This SPD is stated as forming part of the Local Development Framework, although the Core Strategy and UDP to which it was a supplementary document have been superseded by the 2019 Local Plan. The SPD does not reflect current policy and practice in relation to building heights, particularly in relation to the Site where it is contradicted by the subsequent Notting Hill Gate SPD (May 2015).

2.55 However, in relation to the existing and potential impact on Strategic and Local Views, the SPD does identify key views within the Royal Borough and – in relation to views of the grade I listed Kensington Palace, views immediately outside in Westminster, which carries some weight – not least in that similar views across the Round Pond towards Kensington Palace are also identified by Westminster (see below: Metropolitan Views Draft SPD (October 2007) (Ref 1-13) and Heritage, Views and Tall Buildings, Booklet No. 15 Westminster City Plan Revision (January 2015) (Ref 1-14).

2.56 In relation to Strategic and Local Views: "Tall buildings should not compromise important views in the Royal Borough. They should not block or dominate a landmark or view, or create an intrusive element in its foreground, middle ground or background". (para 4.11) A map is provided at Figure 06 of the SPD, which identifies key 'townscape views' along the River Thames from Chelsea Bridge, and across the Round Pond in WCC towards Kensington Palace, and which identifies 'key landmarks' beyond the Palace in that view, which are part of tall building cluster 4, identified in Figure 01 of the SPD: Figure 06 is reproduced below, along with a 360-degree panorama from the Round Pond, which includes the townscape view towards Kensington Palace.

NB. Contrary to the shaded cone of the 'townscape view' and the centre of the panoramic view identified in plan on Figure 06 of the SPD as located on the east side of the Round Pond, the panoramic view illustrated on page 31 of the SPD appears to be taken from the west side of the Round Pond.





Panorama from Round Pond (SPD, page 31)



Extract from Panorama above illustrating townscape view (SPD, page 31)

2.57 Views A1 – A6 in Appendix A of this Townscape and Visual Impact Assessment provide a series of views from Kensington Gardens, including across the Round Pond (View A2) and towards Kensington Palace (Views A3-6)

RBKC, Notting Hill Gate SPD (May 2015) (Ref 1-11)

- The Notting Hill Gate SPD is supplementary to the Council's Local Plan. Its purpose is to (para 1.3):
 - Promote high quality development
 - Ensure a coordinated approach to building form, land use and public realm proposals
 - Provide certainty in the planning and development process and facilitate redevelopment of key sites
 - Identify a number of public benefits that the development could deliver for the area that would be paid for by developer contributions.

This an aspirational document which has three key objectives to:

- Improve the streets and public spaces;
- Improve the buildings and architecture; and
- Strengthen the identity of Notting Hill Gate.
- The SPD includes a proposal for the Newcombe House site, which it is stated (para 4.11): "has an important part to play in the future of Notting Hill Gate. However, there are significant constraints. Rights to light place a constraint on increasing the height along Kensington Church Street. The connecting interchange tunnel between the District and Circle, and Central lines has the effect of setting back any substantial structure from the Notting Hill Gate frontage on the corner of Kensington Church Street, although cantilevering or a lightweight structure are possibilities."
- 2.60 The report proposes that the existing office block could be refurbished and reclad, or redeveloped: "a redevelopment to a different plan form might be acceptable. In such a case the Council will seek a building with a less bulky profile than the current block. There may be an opportunity to move the building towards Notting Hill Gate slightly although the underground structures are recognised as a constraint." (para 4.16). Also.

"The Council may entertain a modest increase in height over the existing building where a scheme is proposing significant benefits to Notting Hill Gate and delivers an architecturally excellent building, provided this does not have a harmful impact on the views mentioned above." (para 4.17)

The relevant key 'verified views' are identified at Figure 11 of the SPD. These are illustrated below, though only views 3-4 are directed towards the Site; View 17 in this assessment is similar to view 3 in the SPD, and View 19 is slightly further west of view 4 in the SPD (and close to view 6 shown on Figure 14). Figure 11 also identifies more generalised 'sight lines' along the main thoroughfares; Views 1-3 in this assessment are along Kensington Church Street and Views 4-9 in this assessment are along Notting Hill Gate. As set out in Section 6 below, the Proposed Development will not have a harmful impact on any views.





Local Planning Policy and Guidance – City of Westminster
The Proposed Development would be visible in some views

The Proposed Development would be visible in some views from the City of Westminster. Relevant policy and guidance relating to views is referred to below.

Westminster City Council City Plan 2019 – 2040 (2021)

Westminster City Council's City Plan was adopted in April 2021 and it represents the key document used in determining planning applications in Westminster. The previous City Plan (November 2016) and saved UDP policies are superseded by the 2021 City Plan.

2.64 Policy 40 (Townscape and architecture) states that "New development affecting strategic and local views (including local views of metropolitan importance) will contribute positively to their characteristics, composition and significance and will remedy past damage to these views wherever possible." The accompanying text notes that "metropolitan views" have been identified and Westminster will "...publish a list of views of metropolitan views and prepare guidance on their management." At the time of writing, April 2023, the only list and guidance published is that pre-dating the City Plan, set out below.

Policy 41 (Building Height) states that, inter alia, proposals for tall buildings will be required to "enhance the character and distinctiveness of an area without negatively affecting valued townscape and landscapes, or detracting from important landmarks, heritage assets, key views and other historic skylines and their settings...".

Metropolitan Views Draft SPD (October 2007) (Ref 1-13) and Heritage, Views and Tall Buildings, Booklet No. 15 Westminster City Plan Revision (January 2015) (Ref 1-14) Westminster prepared the Draft Views SPD (2007) (Ref. 1-13) identifying a series of key metropolitan views, which are defined (on page 2) as:

"Familiar views held in affection by both Londoners and visitors, enjoyed from well-known public spaces and featuring an exceptional townscape or landscape, including visually prominent landmarks; they demonstrate the outstanding qualities of Westminster's environment."

These same view locations (excluding the detailed descriptions) were subsequently incorporated into the Heritage, Views and Tall Buildings, Booklet No. 15 (2015) (Ref. 1-14). Of the 45 views identified, only View 12, Kensington Palace from Hyde Park, is relevant to the Proposed Development. As identified in detail in the Draft SPD (2007), this is a focused view of Kensington Palace taken from a footpath approaching the NE part of the Round Pond. In describing the view, the SPD text states that the "Seen across the lake, the low skyline is only interrupted by the Royal Kensington Hotel block. The outline of the Palace is softened by the backdrop of a continuous tree canopy. These trees help to screen the upper stories of apartment blocks to the west. On the western side of the Lake, the outline of the

Palace can be enjoyed set against the sky.". In respect of the view's composition, it notes that "This focus is the east front of the Palace, which appears to be set in a semi-rural location. Trees frame the view and the Round Pond provides an attractive foreground." Under the heading "View Protection" the SPD text states that "The background to the Palace is potentially vulnerable to further development in the residential area between Hyde Park and Holland Park and any proposals will need careful assessment to ensure that this view is not compromised."

The View 12 position is similar to that selected for RBKC's subsequent townscape view from the Round Pond, in their Building Height in the Royal Borough SPD (September 2010) (Ref. 1-10). Views A1 – A6 in Appendix A of this TVIA provide a series of views from Kensington Gardens, including across the Round Pond (View A2) and other positions towards Kensington Palace (Views A3-6).



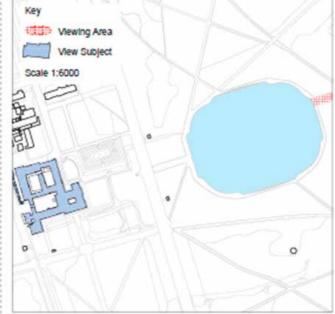


Fig. 1: Metropolitan Views Draft SPD (October 2007), view 12: Kensington Palace from Hyde Park

- The Royal Parks, Kensington Gardens Management Plan 2016 (Ref. 1-15)
- 2.69 The Kensington Gardens Management Plan (Ref. 1-15) describes and evaluates the whole landscape resource of the Gardens, defines aims and objectives and develops a suite of policies to guide long-term management. It is primarily intended as a tool to be used by the park management team. While Kensington Palace is located within Kensington Gardens, the Gardens are within WCC and the Palace is located across the Borough boundary in RBKC.
- 2.70 Views policies are set out on p131, and a map of view locations is provided on pp132-133. Policy View 1 states that "Views from and into Kensington Gardens are critical to the character of the Gardens and will be managed to respect the historic identity of the park and to protect and enhance these significant visual relationships." Paragraph 1.5, Views from Kensington Gardens, states that "Outward views from Kensington Gardens are for the most part framed by the tree canopy punctuated by church spires, only occasionally impinged on by incongruous tall buildings. Important views include from Buck Hill (north Bastion and Peacock Walk) over Hyde Park, from Queen Caroline's Temple towards Westminster and the Serpentine, and from Lancaster Gate Walk past the Albert Memorial to the Royal Albert Hall."
- 2.71 There are two views which have Kensington Palace identified as the focal point of the view, and which are potentially relevant to development on the Site. View 1 is a vista view from in front of Kensington Palace; Views A4 and A5 in Appendix A of this TVIA document provide similar views, aligned in the direction of the Site. View 2 is from the Physical Energy Statue; the ZVI indicates that the Proposed Development would not be visible from this point.

3 Assessment Methodology

Introduction

- This report provides an assessment of the townscape and visual effects of the Proposed Development. Although the assessment of townscape and views are clearly inter-related, each topic is distinguished in this report, and the methodologies for the townscape and visual assessments are set out separately below.
- While above-ground heritage assets are considered in this report insofar as they inform the sensitivity of townscape and views, the effect of the Proposed Development on the significance of heritage assets is not assessed; this assessment is provided in a separate report accompanying the planning application, produced by MOLA.
- The baseline section of this report includes an assessment of
 - The character of the townscape on and around the Site (informed by site visits and desk top research);
 - The existing characteristics of the agreed verified views;
 - The sensitivity of the townscape and views, based on an understanding of their 'value' and 'susceptibility to change' of the receptors.
- The views assessed in this report have been carefully selected in order to consider effects on specific designated views and representative and illustrative views, and to help inform an assessment of the overall effect of the Proposed Development on townscape character. The agreed viewpoints cover well visited areas, local communities, users of important open spaces and footpaths, and designated areas that fall within the ZVI, and have been selected to allow a methodical 360 degree view analysis of near, middle and distant views of the Proposed Development. All verified views have been taken from publicly accessible land.
- The assessment of the effect of the Proposed Development on the townscape and views which follows the baseline section is based on the methodology set out below and takes into account the following guidance:
 - Guidelines for Landscape and Visual Impact Assessment Third Edition (GLVIA) (2013) (Ref 1-16) produced jointly by the Landscape Institute and the Institute of Environmental Management and Assessment; and
 - London View Management Framework Supplementary Planning Guidance (LVMF SPG) (2012) (Ref 1-7); and.
 - Landscape Institute's Technical Guidance Note, Visual Representation of Development Proposals (2019) (Ref 1-17).

- Although developed for the assessment of landscape impacts, the GLVIA (Ref 1-16) is broadly applicable to all forms of landscape (including townscape). The GLVIA states that an assessment should address potential effects on the character and distinctiveness of the landscape and effects on observers through their experience of views. The methodology employed for this assessment is based on approaches recommended in the GLVIA. It should be noted that the quidance states that its methodology is not prescriptive in that it does not provide a detailed universal methodology that can be followed in every situation (Para.1.20); the assessment should be tailored to the particular circumstances in each case with an approach that is in proportion to the scale of the project that is being assessed and the nature of its potential effects. The guidance recognises that much of the assessment must rely on professional judgement (Paras.2.23-2.26). The LVMF SPG (Ref 1-7) identifies and sets out policy to protect a number of strategic views within London and provides guidance on the qualitative visual assessment of the designated views. It is also applicable to the assessment of effects on undesignated views within London more generally. The Landscape Institute's Technical Guidance Note, Visual Representation of Development Proposals (Ref 1-17) sets out guidance on the use of camera lenses for verified imagery.
- As set out further below for each topic, a defined process for the assessment of effects is followed. Simple word scales are used as a means of summarising judgements at each stage of the assessment sequence, with detailed narrative describing the reasoning for each judgement in the accompanying text. The word scales for each step of the assessment contain between three and five categories, as set out further below, and in each case a mid-point between two categories may also be chosen (e.g. 'low-medium' could be chosen as a mid-point between 'low' and 'medium').

Defining the Study Areas

In accordance with standard practice, the townscape and visual study areas have been defined in relation to the scale and massing of the Proposed Development and the scale, character, layout and sensitivity of the existing townscape context around the Site. Using computer modelling to determine the theoretical Zone of Visual Influence (ZVI) of the Proposed Development, with site observation and more detailed testing of potential impacts within the ZVI, a study area for each assessment topic has been defined within which significant effects could be expected on the identified townscape and visual receptors. It is normal to identify a potential study area informed by a ZVI, but especially in built-up urban environments, the actual area within which there may be potentially significant effects is usually much more contained. The ZVI in Appendix E, which does not include trees, shows the potential for widespread visual impacts within approximately 750m-1km of the Site. More detailed testing of views in the 3-d model (including the test views modelled in Appendix A) has demonstrated that there would be potential

for significant townscape and visual impacts within a radius of approximately 250-500m of the Site. Outside this area, while tall development on the Site could be visible, impacts would not generally be 'significant', although there are more distant areas of potential higher visibility outside this range, for example along aligned streets or across open spaces, which vary in their potential for significant effects according to the sensitivity of the intervening townscape, and which reduce in scale with distance from the Site. This has informed the extent of the study area considered to be sufficient to understand the range of likely significant effects of the Proposed Development for each topic. Each study area is considered to be reasonable and proportionate in relation to the anticipated effects of the Proposed Development and the sensitivity to change of its townscape and context.

Townscape Assessment Methodology

Baseline Assessment of Townscape Sensitivity

- The existing townscape character in the area around the Site has been assessed based on desk top research and site survey, and consideration of the GLA's Character and Context SPG (Ref 1-18). Following this study, the townscape has been divided into areas of broadly similar character and quality; these 'townscape character areas' (TCAs) are the townscape receptors for assessment, and together they form the study area described above.
- 3.10 The sensitivity of the existing townscape has then been assessed. This has taken into account the value of the townscape – i.e. taking into account the quality of the townscape, including its coherence, structure and attractiveness, and the presence of heritage assets – and the susceptibility to change of the townscape – i.e. the degree to which it could accommodate the type of development proposed without unduly affecting its character. Taking both factors into account, the sensitivity of the townscape is assessed on the following word scale – Very High, High, Medium, Low or Very Low.

Assessment of Magnitude of Impact to Townscape

3.11 The overall magnitude of change (impact) resulting from the Proposed Development on each TCA is assessed as High, Medium, Low, Very Low or None. A broad summary of the magnitude criteria is set out in Table 3.1 below.

Table 3.1: Magnitude of townscape impacts

Magnitude	Description
None	No change to townscape character.
Very Low	A change to townscape character and/or features that would be barely perceptible.
Low	A slight change to townscape character and/or features that may not be immediately noticeable.
Medium	A clear change that would not dominate townscape character and/or features which would be noticeable.
High	A change to townscape character which would be immediately apparent.

This assessment takes into account a number of factors (with reference to guidance in the GLVIA) which may include the extent to which existing townscape features within the Site boundary would be lost, the overall size and scale of the Proposed Development, the geographic extent of the Proposed Development's impact, the urban design changes introduced by the Proposed Development and how far the Proposed Development integrates with the surrounding townscape character. The duration and reversibility of the Proposed Development's effect is also taken into account. This assessment is informed by consideration of changes to representative views of or from the TCA in question.

Assessment of Scale and Nature of Townscape Effects

The final assessment of the scale of the townscape effect on each of the TCAs is based on the combination of the judgements of sensitivity of the TCA and the magnitude of impact as a result of the Proposed Development. The rationale for the judgement is clearly and transparently explained in the narrative to demonstrate how the assessment has been derived, and is summarised based on the broad categories set out in Table 3.2A.

Table 3.2A – Scale of effects

		Magnitude of Impact									
		None	one Very low Low Medium								
	Very High No effect		Minor	Moderate	Major	Very major					
Sensitivity	High	No effect Negligible minor		Minor/ moderate	Moderate/ major	Major/ very major					
	Medium No effect		Negligible	Minor	Moderate	Major					
	No effect Negligible		Negligible/ minor	Minor/ moderate	Moderate/ major						
			Negligible	Negligible	Minor	Moderate					

- 3.14 The matrix in Table 3.2A explains how the magnitude of impact is combined with sensitivity to produce an assessment of the scale of effect. Where the scale of effects are given a range in the table above, professional judgement is used to choose either of the categories shown, or a mid-point between them e.g. a low magnitude impact on a receptor of high sensitivity could result in a minor scale of effect, a minormoderate scale of effect, or a moderate scale of effect.
- 3.15 The aualitative nature of each effect is assessed as beneficial. adverse or neutral (in line with Table 3.3B) using professional judgement and considering each TCA on a case by case basis. The nature of effect is described in the detailed narrative.

Table 3.2B – Nature of effects

Nature of effect	Description
Adverse	The quality of the townscape is diminished.
Neutral	The quality of the townscape is preserved or there is a balance of adverse and beneficial effects.
Beneficial	The quality of the townscape is improved.

- 3.16 In the qualitative assessment of the nature of effects, there are likely to be a number of different positive and / or negative impacts that contribute to an overall assessment of effect. A neutral effect may result from a balance of positive and negative impacts, or may reflect a situation in which there is no appreciable beneficial or adverse effect.
- Beneficial effects could arise from the positive reinforcement of the existing character of the TCA, for example, or the provision of urban design benefits; adverse effects could arise from the removal of a good quality aspect of townscape on the Site, for example, or the introduction of a new element that is disruptive to high quality aspects of the existing townscape character.

Cumulative assessment

3.18 The approach to cumulative assessment is to consider the additional effect of the Proposed Development on TCAs, on top of those effects that would arise from other 'cumulative' schemes that have been proposed or consented i.e. the effect of the Proposed Development if the cumulative schemes were already in place and formed a 'cumulative baseline'.

Visual assessment

Views presentation

In order to demonstrate the change to visual amenity and townscape character as a result of the Proposed Development, three separate images have been prepared from each viewing location selected:

- **1. Existing** the view as it exists currently;
- **2. Proposed** the Existing view with the Proposed Development inserted in render or blue wireline form; and
- **3. Cumulative** the Proposed view with consented cumulative schemes inserted as orange wirelines.
- 3.20 The Proposed Development has been shown fully 'rendered' or in a blue 'wireline' in the proposed and cumulative views. A 'wireline' image shows the scale and massing of the Proposed Development represented as a blue outline within the baseline photograph; a 'render' image illustrates the Proposed Development in photorealistic form, showing the detailed articulation and materials that are proposed, as

well the Proposed Development's scale and massing. Where the Proposed Development would not be visible, its position relative to the foreground of the existing view may be shown with a dashed outline. The methodology employed by the visualisation firm, Miller Hare, to create the verified views is provided in Appendix D. The Visual Assessment, in Section 6 of this volume is based on the images prepared by Miller Hare which are, in turn, based on the computer-generated model of the Proposed Development prepared by the architects, Squire and Partners, who have confirmed the accuracy of the visualisations in relation to their design proposals before the Tavernor Consultancy have assessed them. Two rendered dusk views have been included to allow an assessment of the illuminated Proposed Development after dark. The internal lighting of the Proposed Development as shown in these views is indicative.

- 3.21 At the request of RBKC, the view images have been generally taken with a 50mm unshifted lens. In some case, which have been agreed with RBKC, a wider angle lens or shifted 50mm image has been used in order to allow the Proposed Development to be better appreciated within its townscape context. In cases where shift has been used, an unshifted baseline image has also been provided for reference (see Appendix B).
- A previous scheme for the Site was granted planning permission by the Secretary of State in June 2020; this proposed six buildings with a maximum height of ground plus 17 storeys. A set of views comparing the consented scheme with the Proposed Development has been provided as Appendix C.

Sensitivity of views

- 3.23 The sensitivity of each existing view is assessed. This has taken into account the value of the view i.e. taking into account any designation in planning policy and guidance, the quality of the townscape seen in the view including heritage assets that may be visible in or from the viewing position, and the composition and scenic quality of the view and the susceptibility to change of the viewer i.e. the degree to which a viewer would notice and have their visual amenity affected by development. Residents and viewers in their leisure time are generally considered to be more susceptible to change than people at their place of work, engaged in sport, or on the move.
- Judgements of susceptibility to change of the visual receptors are combined with a judgement on the value of a view to arrive at the overall sensitivity of the view, which is categorised as Very High, High, Medium, Low or Very Low.

Assessment of Magnitude of Impact to Views

The overall magnitude of change resulting from the Proposed Development with respect to each proposed view is assessed as High, Medium, Low, Very Low or None. The judgement on the magnitude of change to a view is based on a professional appraisal of interrelated factors set out in para 6.39 of the

GLVIA (Ref 1-16), which are described in the narrative accompanying the proposed view where relevant. Consideration is given to the size and scale of the effect, including factors such as the loss or addition of features, changes in view composition, the proportion of the view occupied by the Proposed Development, the extent of its visibility, and the consistency or contrast of the Proposed Development with the existing townscape character in the view; the geographical extent of the visual effect, which reflects the distance of the viewing position from the visible parts of the Proposed Development and any kinetic or seasonal changes to its visibility from this distance; and the duration and reversibility of the Proposed Development's effect.

Table 3.3: Magnitude of visual impacts

Magnitude	Description
None	No change
Very Low	A change to the view that would be barely perceptible.
Low	A change that would have a slight effect on the view that may not be immediately noticeable.
Medium	A clear change that would be noticeable but would not dominate the composition of a view.
High	An immediately apparent change that would dominate or become the focal point of a view.

Assessment of Scale and Nature of Visual Effects

The matrix in Table 3.4A explains how the magnitude of impact is combined with sensitivity to produce an assessment of the scale of effect. Where the scale of effects are given a range in the table above, professional judgement is used to choose either of the categories shown, or a mid-point between them e.g. a low magnitude impact on a receptor of high sensitivity could result in a minor scale of effect, a minor-moderate scale of effect, or a moderate scale of effect.

Table 3.4A – Scale of effects

		Magnitude of Impact										
		None	None Very low Low Medium									
Sensitivity	Very High	No effect	Minor	Moderate	Major	Very major						
	High No effec		Negligible/ minor	Minor/ moderate	Moderate/ major	Major/ very major						
	Medium	No effect	Negligible	Minor	Moderate	Major						
	No effect Negligible Very Low No effect Negligible		Negligible	Negligible/ minor	Minor/ moderate	Moderate/ major						
			Negligible	Minor	Moderate							

The qualitative nature of each effect is assessed as beneficial, adverse or neutral (in line with Table 3.4B) using professional judgement. The nature of effect is described in the detailed narrative.

Table 3.4B – Nature of visual effects

Nature of effect	Description
Adverse	The quality of the view is diminished.
Neutral	The quality of the view is preserved or there is a balance of adverse and beneficial effects.
Beneficial	The quality of the view is improved.

- 3.28 In the qualitative assessment of the nature of effects, there are likely to be a number of different positive and / or negative impacts that contribute to an overall assessment of effect. A neutral effect may result from a balance of positive and negative impacts, or may reflect a situation in which there is no appreciable beneficial or adverse effect.
- A beneficial effect could arise from the Proposed Development, for example, removing a negative aspect of the view, or from it positively consolidating the compositional qualities of a view, or through its introduction of high quality new architecture to the view. An adverse effect could arise, for example, from the removal of an element on the Site that contributes positively to a view, or from the introduction to the view of new development of low visual quality, or that detracts from an existing high quality composition or element/ feature of the composition. A neutral effect could arise in a situation in which both beneficial and adverse effects such as those noted above are evident in a manner which balance each other.

Cumulative assessment

3.30 The approach to cumulative assessment is to consider the additional effect of the Proposed Development on views, on top of those effects that would arise from other 'cumulative' schemes that have been proposed or consented i.e. the effect of the Proposed Development if the cumulative schemes were already in place and formed a 'cumulative baseline'.

4 Baseline conditions

Introduction

- The urban development of London has resulted from a combination of careful foresight and planning, and a pragmatic, sometimes expedient response to opportunities and events. Through complex interactions London's fabric has become highly stratified and is represented by a great variety of architectural styles and building types. These have been built over many centuries in response to changing opportunities, and to the expectations and demands of London's citizens.
- London has not been defined physically by any single overriding architectural idea or stylistic era. It represents a
 blend of many architectural periods Georgian, Victorian,
 Edwardian and Modern which have all added to its building
 stock within an existing or altered framework of streets
 and public spaces. The juxtaposition of building types and
 styles, and a great range of competing visual landmarks, all
 contribute to London's rich and varied townscape and skyline.
 Acknowledging this variety is key to appreciating the qualities
 and richness of London's urban character.

The Site

- 4.3 The Site has an irregular boundary running along Notting Hill Gate to the north, Kensington Church Street to the east, Kensington Place and Newcombe Street to the south, and Notting Hill Gate London Underground Station/ Uxbridge Street to the west. The Site's overall shape is broadly that of a rectangle with its long axis aligned north-south, such that the longer frontages face east and west.
- The northern part of the Site is occupied by Newcombe House, an 11 storey post-war slab block (plus plant at roof level and a basement level). Its long axis is aligned east-west, such that its long frontages face north and south. It is set back from Notting Hill Gate to its north behind an area of paved open space, with a double-sided staircase leading up to a forecourt and the building's entrance. The open space includes palm trees in planters and benches set adjacent to the road, and a mature tree towards the corner junction.
- 4.5 A two storey linear block along the western side of the Site is set perpendicular to, and partially intersecting with, Newcombe House. This block is arranged at the back of pavement along Kensington Church Street and is also set back behind the paved open space on Notting Hill Gate at its northern end. A short single storey block runs south of the two storey block along Kensington Church Street. Both the one and two storey elements are occupied by commercial uses.
- The Site is completed at its southern end by a five storey post-war building in brick and concrete (Royston Court), formerly in retail and residential use and now unoccupied, and by Newcombe Street to its west, which provides access to the Site from Kensington Place. A surface car park lies within the interior of the Site, to the west of the podium and south

- of the slab block, and this is bounded by a rendered wall with metal security railings to the west (set against the roof structure of the neighbouring London Underground Station).
- Notting Hill Gate, to the north of the Site, is a main road forming part of an important route running through central London and connecting, among other places, Marble Arch/Oxford Street in the east and Shepherd's Bush in the west. It is lined by retail and leisure uses at ground floor level, and a significant number of medium and large scale modern or post-war buildings. Kensington Church Street, to the west of the Site, is a more minor street but nonetheless forms a significant north-south route in the local area, connecting Kensington with Notting Hill. It is also lined by a large number of retail and leisure uses at ground floor level, and addressed by buildings of varied age, scale and appearance. These buildings include a striking modern building of six storeys in height, directly south of the Site on the corner with Kensington Place.
- Kensington Place itself, to the south of the Site, is a narrow street, largely lined by small scale residential terraced buildings. The 19th century Bethesda Baptist Church, a two storey building in brick with stucco front, lies on the other side of Newcombe Street to the Site, on the corner with Kensington Place. Uxbridge Street, to the east of the Site, is also a narrow street, with the character of a service road and addressed by largely blank frontages close to the Site, but lined by a range of small scale and attractive residential buildings, and some ground floor retail and leisure, further east.

Historical development of the Site and its surroundings

- A summary of the historical development of the Site and its surroundings follows, informed by the relevant Conservation Area Appraisals issued by RBKC (Kensington Conservation Area Appraisal (KCAA) Ref 1-19, Pembridge Conservation Area Appraisal (PCAA) Ref 1-20 and Ladbroke Conservation Area Appraisal (LCAA) Ref 1-21) and focusing on the periods that have contributed most to the townscape as it exists today. For more detail on the historical development of the area, please refer to the Heritage Statement by MOLA.
- Notting Hill and Kensington were extensively developed during the course of the 19th century as various estates were broken up and sold off. The streets to the west of the Site and north of Kensington Place were developed for largely small scale housing by John Johnson and his son from 1810, and then in partnership with Joseph Clutterbuck after 1850. The streets further south, between Edge Street and Campden Street, were generally built out in the 1820s and 1830s, under the ownership of John Punter and William Ward, with more sporadic development in Campden Street until around 1850.
- 4.11 To the south-east of the Site, the development of stucco terraced houses along Brunswick Gardens, Palace Gardens Terrace and Strathmore Gardens largely took place from the 1850s to 1870. Further east on the 'Millionaire's Row' of

- Kensington Palace Gardens, large mansions were developed in the mid-19th century.
- 4.12 To the north of the Site, Pembridge Square was developed by Francis and William Radford by 1864, and survives much as built today. While development in Linden Gardens took place in the early 19th century, the area was largely subject to redevelopment between 1871 and 1878 for the tall terraced houses which comprise the predominant form of development today. This redevelopment followed the extension of the Metropolitan Railway to the area in 1844-68. Nos. 38-42 Linden Gardens form a remnant of the earlier development.
- Speculative residential development by various architects and developers took place in the area covered by the Ladbroke Estate, to the north-west of the Site, from 1821 to the 1870s. The parts closest to the Site, on Ladbroke Road and Kensington Park Road, date largely from the mid-19th century and largely comprise brick and stone or stucco terraced housing.
- 4.14 At the time of the Goad insurance map published in 1887 and the OS map of 1893-96, the Site was occupied by a variety of uses facing what was then called the High Street (now Notting Hill Gate) including a public house, and a school on what was then called Silver Street (now Kensington Church Street). Terraced dwellings and commercial premises were located within the Site along both these streets, and along the eastern side of Newcombe Street, which at that time connected through to Uxbridge Street. Other than the High Street, the residential areas around the Site appear much as they do today in the 1890s OS map. Maps from the early and mid-20th century show much the same situation enduring, with an Engineering Works evident towards the northern end of the Site by 1953.
- 4.15 In 1957, construction works began to widen the roadway of Notting Hill Gate and redevelop land on either side of it, including the Site. Newcombe House, together with buildings on the other largest sites redeveloped at this time, was designed by Cotton, Ballard and Blow. This marked the last comprehensive redevelopment in the area, with more piecemeal modern development since.

Townscape Character Areas

- The townscape in the locality of the Site can be broadly separated into a number of areas, although it should be noted that townscape character often forms part of a continuum across boundaries. In the following paragraphs, Townscape Character Areas (TCAs) are identified and assessed, up to a distance of approximately 250m from the Site, in terms of the quality and distinctive character of their townscape and their sensitivity to change according to the criteria set out in the Assessment Methodology (see Figure 1 for a map of TCAs).
- 4.17 The extent of the study area has been informed by site visits and visual testing, including the ZVI, and it comprises the

- area within which it is judged that there may be significant effects on townscape character as a result of the Proposed Development. More distant visual effects beyond the townscape study area of approximately 250m, for example along roads that align on the Site or across open spaces such as Kensington Gardens, have been taken into account through the testing of individuals views within the visual study area.
- Above-ground heritage assets within the TCAs are typically key contributors to the character of the TCA in question and inform the assessment of its sensitivity, and in particular the TCAs other than that containing the Site are in large part covered by wider Conservation Areas. In recognition of this, a brief description of those heritage assets that fall within each TCA has been provided (see Figure 2 for a map of heritage assets within TCAs). As TCAs 2-5 correspond closely to parts of Conservation Areas, a longer description of these Conservation Areas is provided. However, this report does not consider the heritage significance of identified heritage assets or assess the effect of the Proposed Development on their heritage significance; reference should be made to the separate Heritage Statement prepared by MOLA for this consideration.

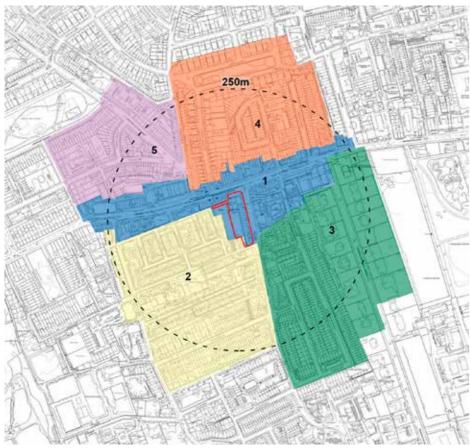


Figure 1 – map of TCAs

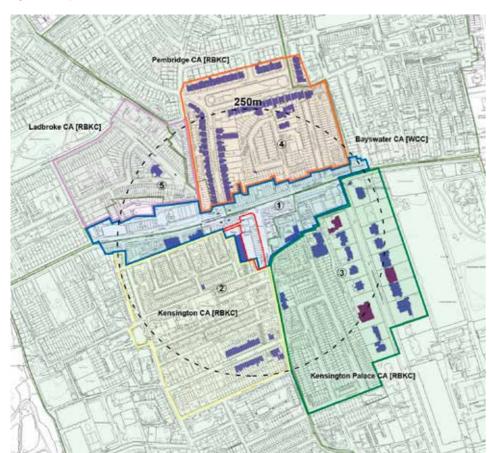


Figure 2 – map of heritage assets within TCAs

TCA 1: Notting Hill Gate

- 4.19 This TCA contains the Site and takes a linear form, running east-west along Notting Hill Gate between Kensington Palace Gardens in the east and Ladbroke Terrace in the west. The extent of the TCA closely corresponds to that of the Notting Hill Gate SPD (Ref 1-11) area, with the principal difference being the inclusion of the Pembridge Road part of the SPD area in TCA 4: Pembridge. TCA 1 is characterised by a main road, local district centre environment, largely addressed by retail and leisure uses at ground level, and with a notable contrast between large scale and often tall post-war and modern development on the one hand, and lower scale historic development on the other.
- The eastern half of the TCA includes a series of large post-war buildings on the southern side of the road – these are, starting at the eastern end and moving west, the Embassy of the Czech Republic building, Astley House, the Site (including the tower of Newcombe House), and David Game House. Historic buildings, typically between two and four storeys tall, terraced and in brick or stucco, lie on the northern side of the road opposite these large post-war buildings. Some of the historic buildings have projecting retail units at ground floor with the upper floors set back from the pavement.
- 4.21 This arrangement of more modern and older development on opposite sides of the road then effectively switches to the west of David Game House, such that the northern side of the road is dominated by large scale post-war buildings (including Campden Hill Towers) while the southern side of the road is largely comprised of older development at a lower scale, in brick and stucco. One notable result of this is that Newcombe House and Campden Hill Towers form a distinctive visual pairing, one on either side of the main road, approximately 150m apart, and together denoting the heart of the district centre. The fact that they are set on alignments at 90 degrees to each other – with Newcombe House aligned east-west and Campden Hill Towers aligned north-south – creates a dynamic visual dialogue between them.
- 4.22 The townscape character and quality of the post-war buildings on the High Street is generally poor, although replacement buildings and consents are beginning to emerge: David Game House, a five storey linear block immediately east of the Site on Notting Hill Gate, was rebuilt to designs by Squires and Partners in 2018 and is of a much higher visual quality as a result, and there is a consent to rebuild Astley House, a four storey post-war building immediately west of the Site on the corner of Notting Hill Gate and Kensington Church Street, to designs by the same architects.
- 4.23 The older, lower scale buildings within the TCA are generally attractive buildings, with the most coherent groupings terraced properties of three or four storeys in brick and with stone details – lying at the eastern and western ends of the TCA. The historic development towards the centre of the TCA

- is more mixed in appearance. A number of the older buildings in the TCA are listed.
- 4.24 Street trees are located along both the northern and southern sides of the road in places, and in the central reservation, and are set out most regularly and consistently to the west of David Game House and the junction with Pembridge Road. These contribute significantly to the character of this TCA.
- 4.25 In terms of heritage assets which contribute to the character and sensitivity of the TCA, small areas within the wider Pembridge, Kensington Palace and Kensington Conservation Areas fall within the TCA; these cover the pockets of historic development fronting Notting Hill Gate as described above, and an area north of Kensington Mall and the post-war Czech Republic building in the case of Kensington Palace Conservation Area. These conservation areas are described in more detail under the TCA in which the main part of them falls. A very small part of the Bayswater Conservation Area within the City of Westminster also falls within the eastern edge of the TCA along Bayswater Road (the continuation east of Notting Hill Gate).
- There are also four listed buildings within the TCA, as set out below. Each of these listed buildings is located in an immediate and local townscape context within the TCA that includes the varied development along Notting Hill Gate, such as the recently remodelled David Game House and the existing post-war slab block of Newcombe House on the Site, the post-war tower of Campden Hill Towers, and the modern office block of Unity House.

Conservation Areas

- Pembridge Conservation Area Royal Borough of Kensington and Chelsea. See TCA 4.
- Kensington Palace Conservation Area Royal Borough of Kensington and Chelsea. See TCA 3.
- Kensington Conservation Area Royal Borough of Kensington and Chelsea. See TCA 2.
- Bayswater Conservation Area City of Westminster. This is a large conservation area, formed of two noncontiguous parts to the east and west respectively of Queensway. That part to the west of Queensway extends as far west as Palace Court, approximately 250m from the Site. That part to the east of Queensway is more than 650m from the Site at its closest point.
- A Conservation Area Audit (CAA) was adopted as Supplementary Planning Guidance in 2000 (Ref 1-22). This notes that the Conservation Area is "...uniform despite its being composed of several distinct areas..." with buildings having "...a common source in the Italianate style." However, it further notes that Palace Court, the street within the Conservation Area closest to

the Site, contains Queen Anne Style houses which are "... of entirely different character to the rest of the conservation area." The very small element of the western part of the Conservation Area within TCA 1 comprises several such red brick and stone Queen Anne style buildings on the northern side of Bayswater Road, at its junction with Palace Court. The local views identified in the CAA (Figure 8b, p27) are largely looking within and towards the conservation area, and none are in the particular direction of the Site.

Listed Buildings

- The Gate Cinema grade II. This is a three storey cinema and attached shops in stock brick with faience clad steel-framed façade to Notting Hill Gate, opened in 1911 following its conversion from a restaurant dating from 1861.
- The Coronet Cinema grade II. This was built as a theatre in 1898 and is now in use as a cinema. It is three—four storeys tall, in classical style with painted (once rendered) stone, and has a distinctive tall corner cupola.
- Notting Hill Underground Station grade II. This is a station of 1868, built for the Metropolitan Railway, and with brick retaining walls with blind arcades, supporting an elliptically arched iron roof, partially glazed and partly panelled with wood.
- Mall Chambers grade II. This is a five-storey block of industrial dwellings, built in 1865-8, in yellow brick with stone dressings.
- 4.27 This TCA is of mixed character overall (low-medium value) and would not be unduly affected by the type of development proposed (low susceptibility). Its overall sensitivity to change would be **low-medium**.

TCA 2: Kensington

- 4.28 This TCA lies to the west of Kensington Church Street and the Site, south of Notting Hill Gate, north of Sheffield Terrace, and east of Campden Hill Road/ Aubrey Road. Most of it lies within the Kensington Conservation Area and broadly corresponds to sub-areas 4: Campden Street to Edge Street, and 5: Hillgate Village, as identified within the Conservation Area Appraisal (see below, Ref 1-19).
- 4.29 The urban form of this TCA largely comprises terraced development, mostly residential with some ground floor retail/commercial uses, arranged along regularly set out roads and with a particularly gridded character towards the north of the TCA (north of Kensington Place). The terraces largely date from the 18th and 19th centuries and range between two and four storeys tall, frequently set over a basement level, and in a mixture of natural brick, painted render and white stucco

- frontages. The houses towards the north of the TCA tend to be smaller in scale than those towards the south. The overall townscape character is that of an attractive residential area.
- The TCA includes the western side of Kensington Church Street, which is lined by ground floor retail and leisure uses and includes buildings of more mixed character than to the west, ranging from historic two-three storey brick buildings to medium scale modern buildings.
- 4.31 The roads within the TCA are in many cases relatively narrow and, combined with the consistent building line and scale of terraced development, this results in a strong sense of enclosure. Nonetheless, larger scale development beyond the TCA, including the existing Newcombe House and Campden Hill Towers along Notting Hill Gate, is often visible in views from this TCA, particularly along the line of streets.
- In terms of heritage assets which contribute to the character and sensitivity of the TCA, the Kensington Conservation Area entirely covers this TCA, and there are a number of listed buildings within it these are set out below.

Conservation Areas

- Kensington Conservation Area Royal Borough of Kensington and Chelsea. The Kensington Conservation Area is large, at around 130 acres (53 ha). The Kensington Conservation Area Appraisal (KCAA) was adopted in February 2017 (Ref 1-19) and, as noted above, sub-areas 4 and 5 identified in that document lie closest to the Site.
- The urban form of this Conservation Area's is described in section 2 of the KCAA (Ref 1-19), p. 9-18 as "... unsurprisingly varied but with separate areas of distinct character with in it" (para 2.1), and the KCAA notes that "Post war development contrasts with the established urban form" (para 2.6). The KCAA describes the sub-area west of the Site, sub-area 5: Hillgate Village, as having a "high degree of unity", although it acknowledges a variety of building designs in streets such as Farmer Street and Jameson Street, and notes that Uxbridge Street, leading to the Site, is "... a transition zone between Notting Hill Gate and the Village and has a mixed character [...]" (para 3.138). Kensington Church Street is characterised as a shopping street in the KCAA (para 3.281), and its piecemeal evolution over the 18th and 19th centuries gives the street a varied character.
- While Newcombe House on the Site and Campden Hill
 Tower to its west are clearly visible across the northern
 part of the Conservation Area, and the south face
 of Newcombe House is visible at the north end of
 Kensington Church Street for much of its length, none
 of the key views identified in the KCAA (Fig. 4.1, page
 147) look towards the Notting Hill Gate frontage of
 the Site. Only a view east along Kensington Place, and

a short range view towards the roof of the LU Station on Kensington Place, look towards the southern end of the Site. It is observed in the KCAA that: "Due to the grid-like character of much of the street layout, there are numerous short views and vistas in the conservation area. Many streets terminate with a vista to houses in the next street often enhanced by street trees or garden planting. Such views give the area a coherent inward-looking character [...]" (para 4.22). It also notes that the railway cutting "...leaves an interesting view of unspoilt side elevations and an unusual prospect all the way to Newcombe House on Notting Hill Gate", which is evident as a contained view from Bedford Gardens and streets north.

Listed Buildings

- 23 Kensington Place (grade II) this is an end of terrace house, built in 1966-7. It is four storeys tall in brick, with a spiral staircase running through all the floors.
- 2 and 4 Bedford Gardens (grade II) these are a pair of early 19th century terraced houses, three storeys with basement, and in brown brick with channelled stucco to the ground floor.
- 19-43 Bedford Gardens (grade II); 3-9 Bedford Gardens (grade II); 14-34 Bedford Gardens (grade II); 36-46 Bedford Gardens (grade II). These are early 19th century terraces, typically comprising three storeys with basement, in brown brick with channelled stucco to the ground floor (some with an additional storey/ mansard, or completely stuccoed).
- 99 and 101 Kensington Church Street (grade II) These are two early 19th century terraced houses with ground floor shops. They are three storeys each, in brick with channelled stucco to the ground floor.
- 4.33 This TCA is of good townscape quality overall (medium value) and has some limited potential to be affected unduly by change beyond it of the type proposed (medium susceptibility). The overall sensitivity to change is assessed as being medium.

TCA 3: Kensington Palace

- 4.34 This TCA lies to the east of Kensington Church Street and extends as far east as Kensington Palace Gardens. It lies entirely within the Kensington Palace Conservation Area.
- 4.35 This TCA largely comprises an area of stucco terraced houses along Brunswick Gardens and Palace Gardens Terrace, and large mansions set within sizable grounds along Kensington Palace Gardens. The eastern side of Kensington Church Street includes retail uses at ground level along part of its length. The major streets in the TCA are aligned north-south and have numerous street trees which screen views to some extent.

- The terraced houses along Brunswick Gardens, Palace Gardens and interconnecting streets are four to five storeys in height, some above a basement level and some behind front gardens, and set out in a regular manner. While there is a strong sense of enclosure within this part of the TCA, due to the scale and consistent building line of the buildings, the existing Newcombe House and other larger and more modern developments are visible from some points.
- Similar stucco houses of four-five storeys line the eastern side of Kensington Church Street, to the south of the junction with Berkeley Gardens. To the north of this junction along Kensington Church Street, the buildings are typically terraced, in brick with stone details, and lower in height at three or four storeys. There is considerable variety along this part of the street, however, including some more modern buildings.
- The mansions along the northern part of Kensington Palace Gardens within this TCA are typically large, stucco fronted and Italianate in style. Some are in residential use and others accommodate foreign embassies. The character of this part of the TCA is grand and formal, and relatively coherent, albeit the individual designs of the mansions differ considerably.
- Significant mature tree coverage screens views out of the street to some extent, although views between mansions are possible. These views have an incidental character and large scale, post-war and modern development such as that along Notting Hill Gate is visible in them in the middle distance.
- In terms of heritage assets which contribute to the character and sensitivity of this TCA, this TCA is entirely within the Kensington Palace Conservation Area and there are a number of listed buildings within the TCA, as set out below.

Conservation Areas

- Kensington Palace Conservation Area Royal Borough of Kensington and Chelsea. This conservation area is bounded by Notting Hill Gate/Bayswater Road (north), Kensington Gardens and the boundary of the City of Westminster (east), Kensington High Street (south), and Kensington Church Street (west). Kensington Palace and Kensington Gardens to the east dominate the Conservation Area.
- There is no Conservation Area Audit for the Kensington Palace Conservation Area, although there is a Proposals Statement dating from 1997 (Ref 1-23). The red brick Queen Anne Kensington Palace dominates the Conservation Area, but its general architectural character is described as very varied. The exclusive residential mansions of Kensington Palace Gardens run north-south down the centre of the area, with large hotel buildings and mansion blocks to the south-west, and residential terraces to the north-west.

• The existing Newcombe House is partially visible from Kensington Gardens and Kensington Palace Gardens (see views A1-A6 in Appendix A, and View 27 in the views assessment in Section 6 respectively), and clearly visible from the north-west part of the conservation area along Kensington Church Street (e.g. View 3 in Section 6).

Listed Buildings

- 16 Kensington Palace Gardens grade II; 17 Kensington Palace Gardens grade II; 18 and 19 Kensington Palace Gardens grade II*; 20 Kensington Palace Gardens grade II; 21 Kensington Palace Gardens grade II; 22 Kensington Palace Gardens grade II; 23 Kensington Palace Gardens grade II; 24 Kensington Palace Gardens grade II*. These listed buildings are located on the western side of Kensington Palace Gardens. Other than Nos. 18 and 19, which are a pair of houses, these are substantial two or three storey detached houses of the mid-19th century, some with later alterations. They are generally faced in stucco, with Nos. 18 and 19 in stone.
- Nos. 6 and 7 Kensington Palace Gardens grade II; No. 9 Kensington Palace Gardens grade II; No. 10 Kensington Palace Gardens grade II; No. 11 Kensington Palace Gardens grade II; No. 12 Kensington Palace Gardens grade II; No. 12 Kensington Palace Gardens grade II; No. 13 Kensington Palace Gardens grade II. These listed buildings are located on the eastern side of Kensington Palace Gardens. Other than Nos. 6 and 7, which are a semi-detached pair of houses, these are substantial two or three storey detached houses of the mid-19th century, some with later alterations. They are generally faced in stucco, with No. 12A faced in ashlar and No. 13 in brick with stone dressings.
- North Lodge grade II. This is a one storey lodge in stucco, built in and located at the northern end of Kensington Palace Gardens.
- Two gateways with cast iron gates grade II. These are two gateways from 1845, in stucco and linked by a central pier, located at the northern end of Kensington Palace Gardens.
- Second Church of Christ Scientist grade II. This is a church auditorium, school hall and offices built in 1921-4 in a simplified Italian style. It has an 'L' shaped plan and is built in narrow red bricks with some Portland stone and a pantiled roof.
- No. 128 Kensington Church Street grade II. This is a four storey house, early 19th century or older, in brick and with an L-shaped plan.
- Nos. 132 and 134 Kensington Church Street grade II. This is a three storey house with a mid-19th century façade and possibly 18th century fabric behind. There is

- a ground floor mid-late Victorian shopfront, with stucco frontage above.
- No. 136 Kensington Church Street grade II. This is a house dating originally from 1736-7, altered in the later 18th and 19th centuries and subsequently. Its main frontage is painted brick, three storeys above basement and with an attic floor in the mansard.
- No. 138 Kensington Church Street grade II. This is a house dating originally from 1736-7 and altered in the late 18th century, refitted 1820-30 and probably in the later 19th century, and refurbished in 2013. It is three storeys tall in brick, with basement and attic floor in the mansard.
- This TCA is of good to very good townscape quality (mediumhigh value) and has some limited potential to be affected unduly by change beyond it of the type proposed (medium susceptibility). The overall sensitivity to change is assessed as being medium-high.

TCA 4: Pembridge

- This TCA lies to the north of Notting Hill Gate, south of Pembridge Square, east of Pembridge Road and west of Ossington Street. Almost all of it lies within the Pembridge Conservation Area, considered below, and a small area on Pembridge Square Gardens falls within the Bayswater Conservation Area (City of Westminster), which is considered in general terms under TCA 1.
- The urban form of the TCA comprises a mixture of streets lined by mainly four storey terraced development (some above basement floor and with attic floor), and large, generally detached villas lining the street of Pembridge Gardens and set around the garden square of Pembridge Square Gardens (a linear garden set on an east-west alignment). The villas are typically double-fronted, with stucco fronts. Pembridge Square Gardens is at the heart of the Pembridge Conservation Area; while the eastern side of the square is in Westminster and covered by the Bayswater Conservation Area, its appearance is entirely consistent with that around the rest of the square.
- The terraced development in the TCA is typically stucco, such as much of that along Ossington Street, or in brick with rusticated stucco ground floor and porticos, such as that on Linden Gardens. Pembridge Road, at the western end of the TCA, includes a mixture of both, and accommodates retail ground floor uses along part of its length.
- There is a high level of coherence to the townscape of this TCA, and its overall character is that of a relatively grand and attractive residential area. Some of the most consistent development is that set around Pembridge Square Garden.

In terms of heritage assets which contribute to the character and sensitivity of this TCA, the Pembridge Conservation Area covers almost all the TCA, a small area falls within the Bayswater Conservation Area, and the TCA contains a large number of listed buildings, as set out below:

Conservation Areas

- Pembridge Conservation Area Royal Borough of Kensington and Chelsea. This conservation area is bounded by Westbourne Grove and the City of Westminster (north), the City of Westminster (east), Notting Hill Gate/Bayswater Road (south), and Portobello Road and Pembridge Road (west). Pembridge Square Garden, lined by grand stucco houses, is at its centre, with late Georgian and Victorian terraces surrounding it.
- The Pembridge Conservation Area Appraisal, issued in 2017, (Ref 1-20) summarises its character in section 1 as "primarily a quiet residential area that provides a welcoming break from the noise and bustle of three primary thoroughfares Notting Hill Gate, Westbourne Grove and Pembridge Road / Pembridge Villas" (para 1.5). Its townscape character is set out in section 2, with the PCAA noting that the "main contrast in the area is between the tall narrow building in the south-east, such as in Linden Gardens and Glanricarde Gardens, and the more spacious villa development to the north" (para 2.1).
- Key views within the PCAA are identified in section 5, which comprise "various short and medium views that are constantly changing as one travels through the area" (para 5.1). The existing Newcombe House is not visible from most of the Conservation Area, due to the contained nature of many of its streets, but views along streets such as Pembridge Gardens, Pembridge Place and Linden Gardens, and across Pembridge Square, are in the direction of the Site and in some cases include Newcombe House. The PCAA notes (para. 5.5) that "A number of views contain the 1960s tower blocks of Newcombe House and Campden Hill Tower. The height and bulk of these buildings rise up above some of the houses and shops within the conservation area affecting the Victorian townscape and skyline." Views 23-26 in Section 6 are taken from within the Pembridge Conservation Area.
- Bayswater Conservation Area City of Westminster.
 See TCA 1.

Listed Buildings

- Entrance arch from Linden Gardens, Linden Mews grade II. This is a stucco arch dating to circa 1875.
- Nos. 38, 38B, 40 and 42 Linden Gardens grade II.
 These are two pairs of two storey semi-detached villas,

- dating from c.1827, in yellow stock brick with slated hipped roofs.
- Nos. 1-3 Pembridge Square individually listed at grade II. No. 1 is a former bank, now library, four storeys tall in stucco, incorporating a later 19th century shopfront with Corinthian pilasters. Nos. 2 and 3 Pembridge Square are detached five storey houses in stucco dating from the mid-19th century, with Corinthian pilasters to the first and second floors.
- Nos. 23-35 Pembridge Square individually listed at grade II. These listed buildings are set along the northern side of Pembridge Square. They are mid-19th century detached stucco houses, in a florid classical style, three storeys tall, above basement and with attic above. Nos. 25 and 26 are joined to form a hotel.
- Nos. 19-22 Pembridge Square individually listed at grade II. These listed buildings are set along the eastern side of Pembridge Square. They are mid-19th century detached stucco houses, three storeys tall, above basement and with attic above.
- Nos. 6-18 Pembridge Square—individually listed at grade II. These listed buildings are set along the southern side of Pembridge Square. They are mid-19th century stucco houses, in a florid classical style, three storeys tall, above basement and with attic above.
- Nos. 1-5 Pembridge Gardens grade II, Nos. 7-29
 Pembridge Gardens (odd) individually listed at grade
 II. These are detached mid-19th century houses in stucco, four storeys above basement, set along the eastern side of Pembridge Gardens.
- Nos. 2 to 34 Pembridge Gardens (even) individually listed at grade II. These are detached mid-19th century houses in stucco, three storeys above basement, some with additional attic floor. They are located along the western side of Pembridge Gardens.
- This TCA is of good townscape quality (medium value) and has some limited potential to be affected unduly by change beyond it of the type proposed (medium susceptibility). The overall sensitivity to change is assessed as being medium.

TCA 5: Ladbroke

- This TCA lies north-west of the Site and Notting Hill Gate and has a broadly triangular shape, centred on Kensington Park Road and taking in development to either side of it. Most of it lies within the Ladbroke conservation area.
- 4.49 Kensington Park Road meets Pembridge Road at a roundabout, towards the southern end of the TCA. A distinctive round building with ground floor commercial use addresses

this junction, in brick with stone surrounds and parapet. Another triangular junction lies slightly north-east, between Kensington Park Road and Ladbroke Road; this is addressed by Kensington Temple, a grade II listed church.

- 4.50 Kensington Park Road is a relatively wide street. Residential terraces lie on its eastern side, three storeys above basement in brick and stone, while four storey terraces in stucco and with ornate detailing line the western side of the road. Ladbroke Road is not as wide, but similarly lined by stucco or brick terraced houses, as is Horbury Crescent which links the two roads.
- 4.51 The part of Pembridge Road south of its junction with Kensington Park Road is lined by three storey terraced properties with ground floor retail and painted render frontages above on its eastern side, and the modern office block of United House on its western side.
- 4.52 Views towards the main frontages of the landmark buildings in this TCA, the Kensington Temple, are looking north which is not in the direction of the Site. The post-war slab block of Campden Hill Towers is prominent in views looking south out of the TCA, as is the existing Newcombe House, and these appear as a distinct layer of townscape marking the district centre along Notting Hill Gate.
- The following designated heritage assets lie within this TCA and 250m of the Site and contribute to its character and sensitivity to change in respect of the Site:

Conservation Areas

- Ladbroke Conservation Area Royal Borough of Kensington and Chelsea. This Conservation Area is bounded by the Westway (A40)/Cornwall/Blenheim Crescent (N), Portobello Road (E), Holland Park Avenue/ Notting Hill Gate (S), and Clarendon Road (W). The sweeping residential Lansdowne and Sydney Crescents dominate its centre, bisected by Ladbroke Grove. Commercial activities are located along its north-west boundary; otherwise, it is predominantly a residential area.
- The Ladbroke Conservation Area Appraisal (LCAA, 2015 Ref 1-21) summarises the character of the area as having been developed from the mid-late 19th century and utilising an alternative garden form, in that rather than having a communal garden in a central square opposite the front of the terrace, the communal gardens were created to the rear, and accessed directly from the house (rather than having to cross a road). Buildings tend to be either half or fully stuccoed, although a variety of other materials and palettes, including red brick, grey stone and concrete are used locally. The residential stock comes in a variety of characters crescents, terraces, 'palace frontages', and large semi-detached houses. Its

large communal gardens – such as Ladbroke Square – are heavily treed.

• There are limited views to Newcombe House from Ladbroke Conservation Area and none in the particular direction of the Site that have been identified as key in the LCAA (Ref 1-21, Section 5, Figure 5.1), although a view from Ladbroke Road looking east is in the general direction of the Site and a comparable viewpoint is provided as View 22 in Section 6 of this assessment. Campden Hill Tower and Newcombe House are visible from Kensington Park Road and from part of Ladbroke Road (see Views 12 and 13 from Kensington Park Road and View 22 from Ladbroke Road in Section 6 of this assessment).

Listed Buildings

- Kensington Temple grade II. This listed building is a church in geometrical Gothic style, built in 1848-9, with square towers capped by low spires, and a cruciform plan. The building is faced with random rubble Kentish ragstone with ashlar dressings, with a slated roof.
- Cabman's Shelter grade II. This listed building is a
 one storey Cabman's Shelter located in the middle of
 Kensington Park Road, with entrances in the ends, timber
 cladding on a timber frame, and a low pitched roof with
 overhanging eaves.
- This TCA is of good townscape quality (medium value) and has some limited potential to be affected unduly by change beyond it of the type proposed (medium susceptibility). The overall sensitivity to change is assessed as being medium.

Visual study area

The study area for views has been informed by site visits, visual testing including the ZVI, and the locations of views provided for the previously consented scheme on the Site. Most viewpoints are within a radius of approximately 500m from the Site boundary, as there would be limited visibility of the Proposed Development beyond this. A number of longer distance views have been provided, primarily from positions on roads that align on the Site (see View 1 from the southern part of Kensington Church Street, Views 10 and 11 from Westbourne Grove, View 23 from Pembridge Place, and Views A7-A9 from Talbot Road). Particular attention was paid during the design development stage to Kensington Gardens as a potentially sensitive location in townscape and visual terms, and a range of views up to 1km from the Site have been included from this open space (see Appendix A, Views A1-A6).

Baseline Conclusions

The Site is located in the Notting Hill Gate District Centre, which was substantially rebuilt during the late 1950s and '60s. The Site lies on Notting Hill Gate, a major east-west

route through central London, at its junction with Kensington Church Street, an important north-south route connecting Kensington and Notting Hill. It is not located in a conservation area, however there are four substantial conservation areas arranged around it.

- 4.57 TCA 1, which includes the Site, largely corresponds to the Notting Hill District Centre and is characterised by a mixture of large scale post-war and more modern development on the one hand, and lower scale historic development on the other, including retail, leisure and other commercial uses. None of the post-war buildings within the District Centre are of architectural merit, although David Game House to the west of Newcombe House has been rebuilt in recent years (according to designs by Squires + Partners) to a higher quality than the building it replaces, and a similar treatment has been consented and implemented for Astley House to the east. Placed between them, Newcombe House detracts from the District Centre materially, physically and in terms of its spatial relationship to the street junction adjacent.
- 4.58 TCAs 2 to 5 surround the Site and TCA 1, and are largely residential in character. They each contain coherent and good quality townscape covered by Conservation Areas and, in some cases, listed building designations.
- The existing Newcombe House is visible in some views from each of these surrounding TCAs. Where visible, it typically appears as a townscape element that is distinct and separate from the residential TCAs in the foreground of such views, denoting the location of a main road and District Centre condition beyond. The appearance of the existing Newcombe House as a drab building, with its uniform slabblock massing and nothing in the treatment of its elevations to provide significant articulation and visual interest is such that it typically detracts from the quality of the views.

5 Visual characteristics of the Proposed Development

Introduction

The description of development for the Proposed Development is as follows –

"Partial retention, refurbishment and extension of the Newcombe House tower for continued office use (Class E(g)(i)), the full demolition of the rest of the site comprising existing retail (Class E) and housing (Class C3) uses and surface level car park, and redevelopment to provide retail use (Class E) at ground floor and office use (Class E(g)(i)) at the upper floors, housing (Class C3) and a medical centre (Class E (e)), in new buildings ranging from 6-15 storeys with double basement, and public realm works and other ancillary works (MAJOR DEVELOPMENT)."

- The Proposed Development would retain and extend the existing Newcombe House tower (horizontally and vertically) to create a part 14 and part 15 storey office building, with ground floor flexible retail use on the corner to Kensington Church Street (the 'Newcombe Tower'). A building up to six storeys in height would be provided to the south of the Newcombe House tower, separated from it by a glazed link at ground floor level. This new building (the 'KCS Office Block') would accommodate office space at upper levels and flexible retail space at ground floor along Kensington Church Street. A new building on the site of Royston Court would be eight storeys tall and would accommodate social-rented affordable residential accommodation, and medical floorspace in the lower levels (the 'Medical/ Affordable Block'). A public square with landscaping and seating would be provided on the Notting Hill Gate frontage ('Notting Hill Gate Square'), and the building line along Kensington Church Street would be set back compared to that existing, beneath a colonnade, to increase the width of the pavement. There would be landscape improvements to Uxbridge Street and provision of a pedestrian route through to Notting Hill Gate. Newcombe Street would be relandscaped to provide a pedestrian friendly space with tree planting.
- Newcombe Tower would have a rectangular plan from Level 02 upwards. At ground level and Level 01, the northern and eastern building lines would be recessed compared to those of the floors above, creating a covered arcade area around these frontages, and the north-western corner would be cut back at an angle to allow a connection through to a pedestrian route on Uxbridge Street to the west.
- Newcombe Tower would be expressed as having three linear elements set within its overall rectangular form, with each element having its long axis aligned east-west. Two of the linear elements would be based on the existing volume of Newcombe House and the other linear element would be formed by an additional area added to their north on Notting Hill Gate, replacing the two storey retail unit and set of stairs currently in this location. The new (northernmost) linear

element would reach 14 storeys in height, with a roof terrace above. The two linear elements to its south would be taller; the southernmost element would reach 15 storeys in height and the middle element, while also having 15 full storeys, would have a plant enclosure above the final floor, such that it would be the tallest of the three elements.

- The KCS Office Block could be described as broadly rectangular in plan, albeit with a slightly angled western building line against the boundary with Notting Hill Underground Station and with a kink in the southern building line to follow the Site boundary. At ground level, the building line would be partly set back from the southern Site boundary to allow for a loading area in the south-west corner of the Site. The building would be stepped in form, with the western building line recessed as terraces are introduced, beginning on Level 03, and continuing such that the main building line would become progressively further set back, up to Level 05. There would also be recessed terrace areas on the eastern frontage at this level. Plant contained within enclosures would be located at the Level 06.
- The new building on the former Royston Court site ('Medical/ Affordable Block') would have an irregular pentagonal plan, with its northern building line abutting the KCS Office Block, the eastern, southern and western building lines set at the back of pavement on Kensington Church Street, Kensington Place and Newcombe Street respectively, and with a chamfered corner to the south-east (addressing the junction of Kensington Church Street and Kensington Place). It would have the same plan from the ground floor to its final level of accommodation in Level 07. A rectangular plant enclosure would be located at Level 08.
- The overall elevational approach to the Newcombe Tower would comprise glass reinforced concrete cladding (GRC) which would be light in colour, largely arranged as a frame to glazing set behind, and expressed with a primary vertical grid and a secondary horizontal grid. Each glazed bay within a frame would be the width of a single window, and the windows would be divided vertically by the frame into a group of six at lower levels, a group of four above, and a final group of two or three windows at the top of the building. The frame defining each window bay would have elliptical profiling. There would be areas of solid cladding with a concave profile at the western ends of the northern and southern frontages. On the eastern frontage, the taller middle linear element would be fully glazed with circular balconies to each floor, and on the western frontage the middle linear element would have a central glazed area surrounded by an overall frame of cladding.
- At ground level and Level 01, the frame would continue down to ground as columns at two or three bay intervals, thus forming full height rectangular openings to a colonnade space behind on the northern and eastern frontages.

The recessed frontages at these levels would be extensively glazed.

- The main frontage of the KCS Office Block to Kensington Church Street would have a symmetrical composition, divided into a series of single window bays arranged around a central triple-width bay. On the main floors, the windows would be arranged in a regular manner and set within deep angled reveals in brick. At upper levels, the reveals would be plain, those in the middle levels would be detailed with a receding stepped profile, and at ground level, the brick frame would take the form of arched entrances with a colonnaded space and extensively glazed frontages behind.
- At the top of the building, pairs of double height window bays and the double height central bay at Levels 04 and 05 would alternate with pairs of single height window bays, such that the parapet line of the frontage would step up and down moving along the frontage. There would be terraces at Level 05 above the single height bays on Level 04, with single bays clad in a light-grey aluminium cladding with glazing set-back behind them.
- The architecture of the Medical/ Affordable block would comprise single window bays with glazing and spandrel units framed by angled red brick reveals. The arrangement of the reveals would alternate from floor to floor, between being angled outwards to a central point between each bay, or inwards to a central point between each bay. There would be strongly expressed horizontal banding in precast concrete separating each floor. At ground floor, the red brick would be detailed with a channelled appearance.

6 Assessment of effects

Assessment of design quality

- The Proposed Development would represent a substantial improvement on the existing buildings on the Site in respect of architectural and visual quality, and there would be significant urban design benefits arising from it. The scale and architectural ambition of the Proposed Development would be commensurate with its location in the District Centre of Nottina Hill.
- The arrangement of three buildings of different scales across the Site, and the stepped approach to the massing of Newcombe Tower and the KCS Office Block, would allow the Proposed Development to successfully mediate between the different scales of development in the local area. The tallest building would remain, as at present, at the northern end of the Site, where it would address the important inner London route of Notting Hill Gate and relate to the existing tall building of Campden Hill Towers to its west. Together with that building, it would help to mark the heart of the District Centre. While the scale of the proposed Newcombe Tower would be somewhat greater than that of the existing Newcombe House, this change would be a matter of degree rather than introducing a wholly new scale of development to the Site, and the maximum height of Newcombe Tower would be considerably less than that of the consented scheme for the Site.
- 6.3 The stepped massing of the Newcombe Tower, comprising three linear elements of different heights, would break up its overall scale and provide it with a visually interesting form on the skyline. It would contrast favourably with the undifferentiated massing of the existing Newcombe House.
- The height and scale of the KCS Office Block and the Medical/
 Affordable Block would appropriately step down substantially
 from that of the Newcombe Tower, reflecting the lower scale
 of existing development south of Notting Hill Gate. The scale
 of these buildings would be more akin to that of older apartment blocks in the local area, as well as modern buildings such
 as the six storey building immediately south of the Site on
 Kensington Church Road.
- The progressive stepping back of the KCS Office Block from its western frontage, and the stepping up and down of the parapet line on the eastern Kensington Church Street frontage, would similarly break up the overall scale of this building and provide it with a varied roofline. The Medical/ Affordable Block, while taller than the existing Royston Court, would form a successful intermediary step between the six storey modern block to its south and Newcombe Tower to the north.
- The architecture of the Proposed Development would be of a high quality. Each building would share a strong sense of order in its architecture, with a defined base, middle and top, and elevations arranged in a regular manner. The Newcombe

- Tower's frame and vertical arrangement of windows into groups would provide its elevations with a vertical emphasis. The elliptical profile of the frame to each window bay, and concave profile of panels to solid areas of the elevations, would provide visual interest at a detailed level. Overall, the Newcombe Tower would have an elegant and refined appearance.
- The KCS Office Block would have an attractively symmetrical composition on its main eastern frontage which would be divided into single window bays around a wider central bay, such that it would have a strong rhythm reminiscent of terraced streets. The use of brick would relate well to the materiality of nearby historic buildings, and the arches of the ground floor colonnade would echo the platform arches of the neighbouring listed London Underground Station. The deep reveals to windows would provide depth and articulation to the building's frontages, and detailed interest would be provided by the patterning of these reveals at lower levels.
- The red brick and concrete of the Medical/ Affordable Block would relate well to the red brick and stone of historic buildings in the local area. The angling of the reveals in the Medical/ Affordable Block would provide its frontages with depth and articulation, and variety from floor to floor, while the channelling of the ground floor columns would provide detailed interest.
- The public realm around the Site would be much enhanced by the Proposed Development. The new public square, Notting Hill Gate Square, would include new paving, planters and trees and would be of considerably higher quality than the existing space. The existing mature tree towards the corner of the junction would be retained. The colonnades to Notting Hill Gate and Kensington Church Street would provide a more generous pavement area on both these streets, and provide a sheltered option for movement around the Site. The streets addressed by the Site would be animated by the ground floor uses within the Proposed Development. The provision of $\boldsymbol{\alpha}$ new route through to Uxbridge Street would enhance permeability in the local area and this street – currently an inhospitable access route – would be improved with high quality paving and planting. The public realm of Newcombe Street would be similarly enhanced, including with new trees.

Views Assessment

6.10 A total of 27 verified viewpoints have been selected to inform the visual assessment of the Proposed Development and assess its potential impact on local views and townscape character. The selection of a final set of views was informed by the preparation of a digital ZVI of the Proposed Development, a review of relevant planning documents including conservation area appraisals, a review of the locations of listed buildings, and by site visits. The final selection was agreed with the RBKC planning officers during pre-application discussions. The views selected for assessment are listed in Table 6-1 below.

- For each of the agreed views, there are images of the view 'as existing' and 'as proposed', with the Proposed Development shown either as a fully rendered image or a blue wireline. In addition, three other consented schemes close to the Site have been identified as potentially relevant to 'cumulative' townscape and visual effects, and these have been shown in a further image together with the Proposed Development. The cumulative development schemes are listed in Table 6.3 below and are shown with an orange wireline in the cumulative views, where relevant.
- 6.12 Where the Proposed Development or cumulative developments are not visible or are partially screened behind intervening built form or vegetation, the hidden parts of the development are shown as a dashed wireline.
- 6.13 A combination of winter and summer photography has been used. Winter photography has been used for views where RBKC indicated in pre-application discussions that this would be preferable. Where trees form a significant part of the view in summer images, their impact in relation to visibility of the Proposed Development and/or existing buildings within the view is explained in the narrative, where relevant.
- Appendix A "Supplementary Views" provides additional nonverified views that were tested as part of the design development but have not been assessed in detail in the views assessment. In these views, the Proposed Development would either not be visible or would have a minor visual presence and would not result in significant effects. Accordingly, it was agreed with the RBKC that the views listed in Table 6-2 would not be individually assessed and would be included in an appendix to the TVIA.

The Views



1 | Kensington Church Street – south Of Dukes Lane



2 | Kensington Church Street – south Of Gloucester Walk | Spring



3 | Kensington Church Street/ south of Kensington Mall/ Peel Street



4 | Holland Park Avenue – west Of Ladbroke Terrace |



5 | Notting Hill Gate – Opposite Junction With Campden Hill Road | Spring



6 | Notting Hill Gate – Corner With Pembridge Road





7 | Bayswater Road – Junction With Ossington Street 7N | Bayswater Road – Junction With Ossington Street 8 | Notting Hill Gate – By Junction With Linden





9 | Notting Hill Gate – Looking south Along Kensington 10 | Westbourne Grove – Junction With Ladbroke Church Street



Gardens | Winter



11 | Outside Toilets At westbourne Grove And Denbigh



12 | Kensington Park Road – Opposite Junction With 13 | Kensington Park Road – By Kensington Temple | 14 | Uxbridge Street – By Farm Place | north Ladbroke Square | Winter







15 | At Junction Of Wycombe Square And Aubury Walk 16 | Kensington Place – Junction With Hillgate Place 17 | Hillgate Place – By Hillgate Street







18 | Outside 16 Kensington Place



18N | Outside 16 Kensington Place DUSK



19 | Kensington Place – Junction With Jameson Street 20 | Hillgate Place – Outside No.1





21 | Kensington Place – Looking north Along Newcombe Street



22 | Outside 25 Ladbroke Road On Opposite Site Of The Road I Winter



23 | Pembridge Place, At Junction With Pembridge Villas I Winter



24 | At Junction Of Dawson Place And Pembridge Place | Winter



25 | Linden Gardens – west Side | Winter



26 | Pembridge Gardens – Outside No.6



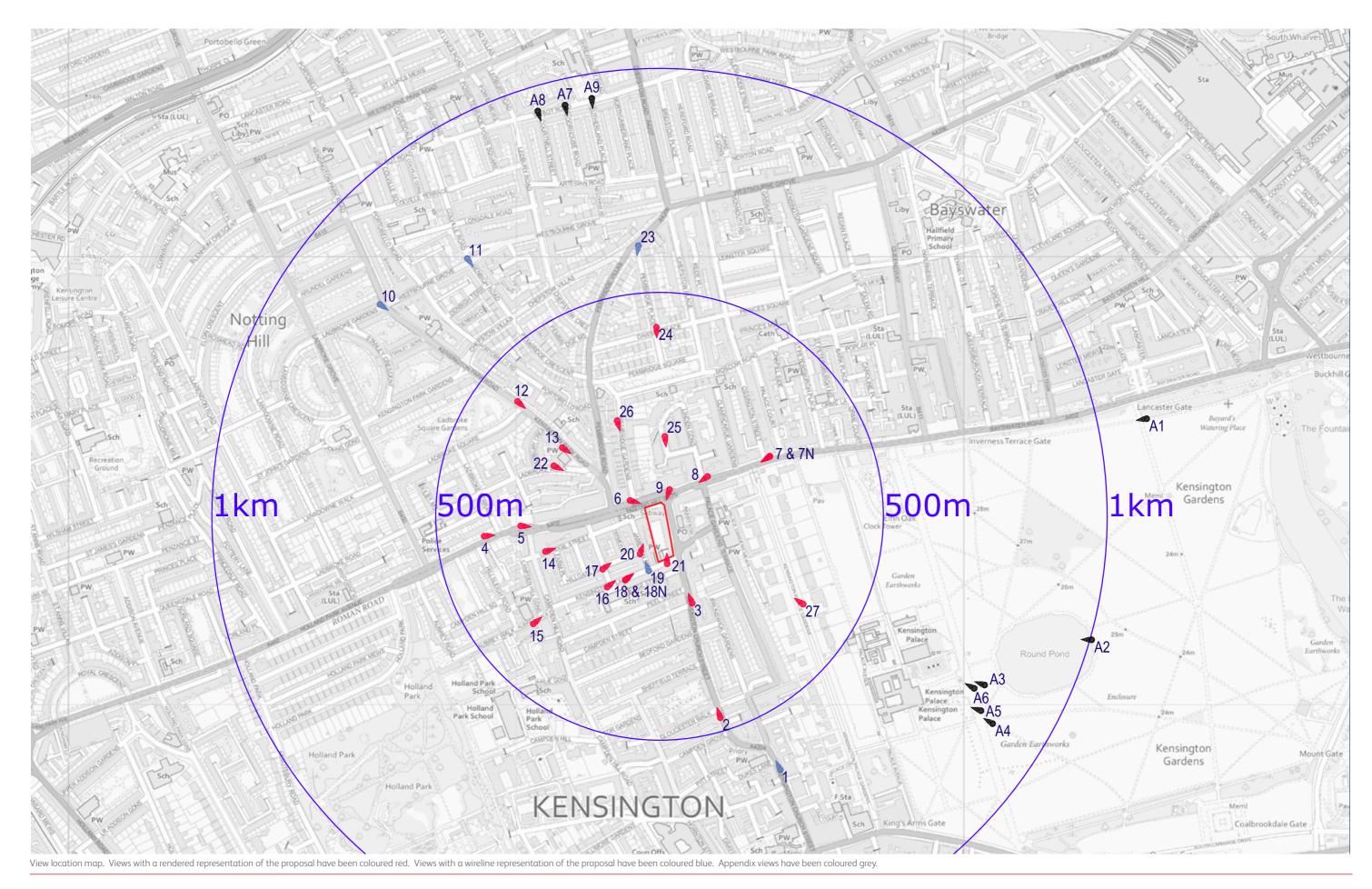
27 | Kensington Palace Gardens | Winter

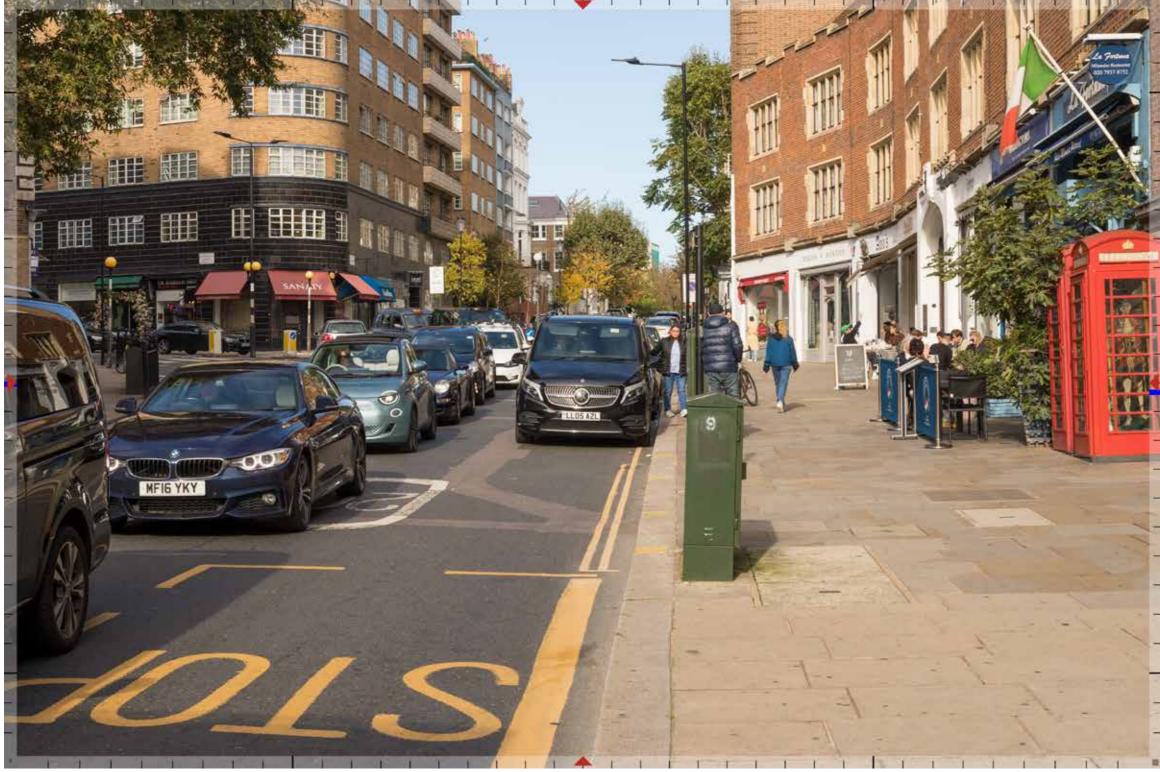
New Note
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7 Bayswater Road – Junction With Ossington Street 4100 Render (AVR3) Verified 525568.2 18055.45 29.89 Canon EOS 5D Mark IV DSLR 50mm 38.8 38.8 16/10/2022 11:15 246.1 0.3 7N Bayswater Road – Junction With Ossington Street I DUSK 4120 Render (AVR3) Verified 525568.3 18055.4 29.84 Canon EOS 5D Mark IV DSLR 50mm 39.2 38.6 19/01/2023 17:28 246.1 0.3 8 Notting Hill Gate – By Junction With Linden Gardens 3910 Render (AVR3) Verified 525429.1 180509.6 28.75 Canon EOS 5D Mark IV DSLR 24mm 73.7 73.2 15/01/2023 10:23 239.7 0.1 9 Notting Hill Gate – Looking south Along Kensington Church Street 5300 Render (AVR3) Verified 52544.2 180480.2 29.03 Canon EOS 5D Mark IV DSLR 24mm 74.1 73.2 16/10/2022 10:49 22.04 0.1 10 Westbourne Grove – Junction With Ladbroke Gardens I Winter 3150 Wireline (AVR1) Verified 524892.6 18099.6
7N Boyswater Road – Junction With Ossington Street I DUSK 4120 Render (AVR3) Verified 525568.3 180554.6 29.84 Canon EOS 5D Mark IV DSLR 50mm 39.2 38.6 19/01/2023 17:28 246.1 0.3 8 Notting Hill Gate – By Junction With Linden Gardens 3910 Render (AVR3) Verified 525429.1 180599.6 28.75 Canon EOS 5D Mark IV DSLR 24mm 73.7 73.2 15/01/2023 10:23 239.7 0.1 9 Notting Hill Gate – Looking south Along Kensington Church Street 5300 Render (AVR3) Verified 525344.2 180480.2 29.03 Canon EOS 5D Mark IV DSLR 24mm 74.1 73.2 16/10/2022 10:49 220.4 0.1 10 Westbourne Grove – Junction With Ladbroke Gardens I Winter 3150 Wireline (AVR1) Verified 524697.5 180893.6 23.01 Canon EOS 5D Mark IV DSLR 50mm 38.5 38.3 27/10/2022 13:41 126.5 0.8 11 Outside Toilets At westbourne Grove And Denbigh Road 7100 Wireline (AVR3) Verified 52504.7 180677.0
Notting Hill Gate – By Junction With Linden Gardens 3910 Render (AVR3) Verified 525429.1 180509.6 28.75 Canon EOS 5D Mark IV DSLR 24mm 73.7 73.2 15/01/2023 10:23 239.7 0.1 9 Notting Hill Gate – Looking south Along Kensington Church Street 5300 Render (AVR3) Verified 525344.2 180480.2 29.03 Canon EOS 5D Mark IV DSLR 24mm 74.1 73.2 16/10/2022 10:49 22.04 0.1 0.1 0 Westbourne Grove – Junction With Ladbroke Gardens I Winter 3150 Wireline (AVR1) Verified 524697.5 180893.6 23.01 Canon EOS 5D Mark IV DSLR 50mm 38.5 38.3 27/10/2022 13:41 126.5 0.8 0.1 0.1 0.1 0.1 0.1 0.1 0.1 0.1 0.1 0.1
9 Notting Hill Gate – Looking south Along Kensington Church Street 5300 Render (AVR3) Verified 525344.2 180480.2 29.03 Canon EOS 5D Mark IV DSLR 24mm 74.1 73.2 16/10/2022 10:49 220.4 0.1 10 Westbourne Grove – Junction With Ladbroke Gardens I Winter 3150 Wireline (AVR1) Verified 524697.5 180893.6 23.01 Canon EOS 5D Mark IV DSLR 50mm 38.5 38.3 27/10/2022 13:41 126.5 0.8 11 Outside Toilets At westbourne Grove And Denbigh Road 7100 Wireline (AVR1) Verified 524892.6 180996.2 22.23 Canon EOS 5D Mark IV DSLR 50mm 38.8 38.8 27/10/2022 13:52 143.1 0.7 12 Kensington Park Road – Opposite Junction With Ladbroke Square I Winter 3000 Render (AVR3) Verified 52504.7 180677.0 28.84 Canon EOS 5D Mark IV DSLR 50mm 40.2 38.5 04/11/2022 14:32 127.8 0.4 13 Kensington Park Road – By Kensington Temple I Winter 2900 Render (AVR3) Verified 525104.6 180573.8 28.16 Canon EOS 5D Mark IV DSLR 50mm 39.1 38.5 04/11/2022 14:13 123.1 0.3 14 Uxbridge Street – By Farm Place I north 8790 Render (AVR3) Verified 525067.1 180342.0 32.28 Canon EOS 5D Mark IV DSLR 50mm 39.3 38.6 15/01/2023 12:21 68.0 0.3 15 At Junction Of Wycombe Square And Alubury Walk 6600 Render (AVR3) Verified 52504.1 180180.5 40.29 Canon EOS 5D Mark IV DSLR 50mm 38.8 38.8 04/11/2022 12:50 46.1 0.4
10 Westbourne Grove – Junction With Ladbroke Gardens I Winter 3150 Wireline (AVR1) Verified 524697.5 180893.6 23.01 Canon EOS 5D Mark IV DSLR 50mm 38.5 38.3 27/10/2022 13:41 126.5 0.8 11 Outside Toilets At westbourne Grove And Denbigh Road 7100 Wireline (AVR1) Verified 524892.6 180996.2 22.23 Canon EOS 5D Mark IV DSLR 50mm 38.8 38.8 27/10/2022 13:52 143.1 0.7 12 Kensington Park Road – Opposite Junction With Ladbroke Square I Winter 3000 Render (AVR3) Verified 525004.7 180677.0 28.84 Canon EOS 5D Mark IV DSLR 50mm 40.2 38.5 04/11/2022 14:32 127.8 0.4 13 Kensington Park Road – By Kensington Temple I Winter 2900 Render (AVR3) Verified 525104.6 180573.8 28.16 Canon EOS 5D Mark IV DSLR 50mm 39.1 38.5 04/11/2022 14:13 123.1 0.3 14 Uxbridge Street – By Farm Place I north 8790 Render (AVR3) Verified 525067.1 180342.0 32.28 Canon EOS 5D Mark IV DSLR 50mm 39.3 38.6 15/01/2023 12:21 68.0 0.3 15 At Junction Of Wycombe Square And Aubury Walk 6600 Render (AVR3) Verified 52504.1 180180.5 40.29 Canon EOS 5D Mark IV DSLR 50mm 38.8 38.8 04/11/2022 12:50 46.1 0.4
11 Outside Toilets At westbourne Grove And Denbigh Road 7100 Wireline (AVR1) Verified 524892.6 180996.2 22.23 Canon EOS 5D Mark IV DSLR 50mm 38.8 38.8 27/10/2022 13:52 143.1 0.7 12 Kensington Park Road – Opposite Junction With Ladbroke Square I Winter 3000 Render (AVR3) Verified 525004.7 180677.0 28.84 Canon EOS 5D Mark IV DSLR 50mm 40.2 38.5 04/11/2022 14:32 127.8 0.4 13 Kensington Park Road – By Kensington Temple I Winter 2900 Render (AVR3) Verified 525104.6 180573.8 28.16 Canon EOS 5D Mark IV DSLR 50mm 39.1 38.5 04/11/2022 14:13 123.1 0.3 14 Uxbridge Street – By Farm Place I north 8790 Render (AVR3) Verified 525067.1 180342.0 32.28 Canon EOS 5D Mark IV DSLR 50mm 39.3 38.6 15/01/2023 12:21 68.0 0.3 15 At Junction Of Wycombe Square And Aubury Walk 6600 Render (AVR3) Verified 52504.1 180180.5 40.29 Canon EOS 5D Mark IV DSLR 50mm 38.8 38.8 04/11/2022 12:50 46.1 0.4
12 Kensington Park Road – Opposite Junction With Ladbroke Square I Winter 3000 Render (AVR3) Verified 525004.7 180677.0 28.84 Canon EOS 5D Mark IV DSLR 50mm 40.2 38.5 04/11/2022 14:32 127.8 0.4 13 Kensington Park Road – By Kensington Temple I Winter 2900 Render (AVR3) Verified 525104.6 180573.8 28.16 Canon EOS 5D Mark IV DSLR 50mm 39.1 38.5 04/11/2022 14:13 123.1 0.3 14 Uxbridge Street – By Farm Place I north 8790 Render (AVR3) Verified 525067.1 180342.0 32.28 Canon EOS 5D Mark IV DSLR 50mm 39.3 38.6 15/01/2023 12:21 68.0 0.3 15 At Junction Of Wycombe Square And Aubury Walk 6600 Render (AVR3) Verified 525040.1 180180.5 40.29 Canon EOS 5D Mark IV DSLR 50mm 38.8 38.8 04/11/2022 12:50 46.1 0.4
13 Kensington Park Road – By Kensington Temple I Winter 2900 Render (AVR3) Verified 525104.6 180573.8 28.16 Canon EOS 5D Mark IV DSLR 50mm 39.1 38.5 04/11/2022 14:13 123.1 0.3 124 Uxbridge Street – By Farm Place I north 8790 Render (AVR3) Verified 525067.1 180342.0 32.28 Canon EOS 5D Mark IV DSLR 50mm 39.3 38.6 15/01/2023 12:21 68.0 0.3 15 At Junction Of Wycombe Square And Aubury Walk 6600 Render (AVR3) Verified 525040.1 180180.5 40.29 Canon EOS 5D Mark IV DSLR 50mm 38.8 38.8 04/11/2022 12:50 46.1 0.4
14 Uxbridge Street – By Farm Place I north 8790 Render (AVR3) Verified 525067.1 180342.0 32.28 Canon EOS 5D Mark IV DSLR 50mm 39.3 38.6 15/01/2023 12:21 68.0 0.3 15 At Junction Of Wycombe Square And Aubury Walk 6600 Render (AVR3) Verified 525040.1 180180.5 40.29 Canon EOS 5D Mark IV DSLR 50mm 38.8 38.8 04/11/2022 12:50 46.1 0.4
15 At Junction Of Wycombe Square And Aubury Walk 6600 Render (AVR3) Verified 525040.1 180180.5 40.29 Canon EOS 5D Mark IV DSLR 50mm 38.8 38.8 04/11/2022 12:50 46.1 0.4
16 Kensington Place – Junction With Hillgate Place 7600 Render (AVR3) Verified 525205.1 180262.7 32.53 Canon EOS 5D Mark IV DSLR 50mm 39.4 38.7 04/11/2022 12:16 30.6 0.2
17 Hillgate Place – By Hillgate Street 1600 Render (AVR3) Verified 525194.9 180302.5 31.07 Canon EOS 5D Mark IV DSLR 50mm 38.8 38.8 04/11/2022 12:27 39.9 0.2
18 Outside 16 Kensington Place 6500 Render (AVR3) Verified 525245.6 180278.5 31.11 Canon EOS 5D Mark IV DSLR 50mm 39.5 38.8 04/11/2022 12:07 21.7 0.2
18N Outside 16 Kensington Place DUSK 6520 Render (AVR3) Verified 525245.5 180278.5 31.09 Canon EOS 5D Mark IV DSLR 50mm 39.5 38.8 19/01/2023 17:15 21.8 0.2
19 Kensington Place – Junction With Jameson Street 7800 Wireline (AVR1) Verified 525297.7 180299.0 29.31 Canon EOS 5D Mark IV DSLR 50mm 38.8 38.8 25/10/2022 12:53 5.0 0.1
20 Hillgate Place – Outside No.1 1350 Render (AVR3) Verified 525278.3 180336.6 28.75 Canon EOS 5D Mark IV DSLR 24mm 73.7 73.2 04/11/2022 11:58 17.0 0.1
21 Kensington Place – Looking north Along Newcombe Street 5100 Render (AVR3) Verified 525339.0 180314.8 28.22 Canon EOS 5D Mark IV DSLR 24mm 73.6 72.9 04/11/2022 11:39 347.0 0.1
22 Outside 25 Ladbroke Road On Opposite Site Of The Road Winter 6950 Render (AVR3) Verified 525085.8 180533.4 27.90 Canon EOS 5D Mark IV DSLR 24mm 74.0 73.1 19/01/2023 14:54 112.6 0.2
23 Pembridge Place, At Junction With Pembridge Villas I Winter 7950 Wireline (AVR1) Verified 525274.8 181025.0 22.97 Canon EOS 5D Mark IV DSLR 50mm 38.8 38.8 27/10/2022 14:45 176.6 0.6
24 At Junction Of Dawson Place And Pembridge Place Winter 7350 Render (AVR3) Verified 525314.9 180842.7 23.87 Canon EOS 5D Mark IV DSLR 50mm 39.3 38.9 30/01/2023 15:03 180.7 0.4
25 Linden Gardens – west Side Winter 3750 Render (AVR3) Verified 525333.8 180598.9 28.04 Canon EOS 5D Mark IV DSLR 50mm 38.8 38.8 25/10/2022 10:57 188.5 0.2
26 Pembridge Gardens – Outside No.6 3610 Render (AVR3) Verified 525227.2 180634.1 27.22 Canon EOS 5D Mark IV DSLR 50mm 38.8 38.8 04/11/2022 14:52 156.9 0.2
27 Kensington Palace Gardens I Winter 4650 Render (AVR3) Verified 525642.8 180224.5 30.29 Canon EOS 5D Mark IV DSLR 50mm 39.1 38.5 30/01/2023 13:23 302.9 0.4

Table 6-2: Supplementary Views (Appendix A)				Camera Location				HFOV						
View	Description	MH Reference	Туре	Method	Easting	Northing	Height	Camera	Lens	Photo	Image	Photo date/time	Bearing d	distance (km)
A1	Kensington Gardens – Lancaster Gate Entrance Spring	4250	Apendix model view	Estimated	526410.0	180638.5	24.99	Canon EOS 5D Mark IV DSLR	50mm	38.8	38.8	16/10/2022 08:39	259.8	1.1
A2	Kensington Gardens – east Of Round Pond Winter	0610	Apendix model view	Estimated	526287.1	180144.9	26.16	Canon EOS 5D Mark IV DSLR	50mm	38.8	38.8	16/10/2022 09:02	286.8	1.0
A3	Kensington Gardens – west Of Round Pond I Summer	0620	Apendix model view	Estimated	526048.0	180044.0	26.59	Canon EOS 5D Mark IV DSLR	50mm	38.8	38.8	16/10/2022 09:22	298.2	0.8
A4	Gardens – Broadwalk Looking Across Kensington Palace I Summer	0630	Apendix model view	Estimated	526065.8	179957.7	25.61	Canon EOS 5D Mark IV DSLR	50mm	38.8	38.8	16/10/2022 10:10	302.5	0.9
A5	Kensington Gardens – Broadwalk Looking Across Kensington Palace I Summer	0590	Apendix model view	Estimated	526039.8	179986.7	25.94	Canon EOS 5D Mark IV DSLR	50mm	38.8	38.8	16/10/2022 09:59	301.8	0.9
A6	Kensington Gardens – Broadwalk Looking Across Kensington Palace I Winter	4350	Apendix model view	Estimated	526024.7	180036.4	26.31	Canon EOS 5D Mark IV DSLR	50mm	38.8	38.8	16/10/2022 09:47	299.5	0.8
A7	Talbot Road, Looking south Along Moorhouse Road	0530	Apendix model view	Estimated	525110.8	181338.5	23.47	Canon EOS 5D Mark IV DSLR	50mm	39.6	39.6	04/11/2022 15:47	167.5	0.9
A8	Talbot Road, Looking south Along Courtnell Street	0540	Apendix model view	Estimated	525049.9	181325.4	23.21	Canon EOS 5D Mark IV DSLR	50mm	41.5	38.8	27/10/2022 14:08	163.6	0.9
A9	Talbot Road, Looking south Along Sutherland Place	0550	Apendix model view	Estimated	525170.6	181353.9	23.59	Canon EOS 5D Mark IV DSLR	50mm	38.8	38.8	27/10/2022 14:24	171.3	0.9

Table 6.3: Cumulative schemes

Ref	Cumulative scheme	Current status			
1	Astley House (15-35 Notting Hill Gate)	Implemented.			
2	66-74 Notting Hill Gate	Implemented.			
3	146-164 Notting Hill Gate	Implemented.			



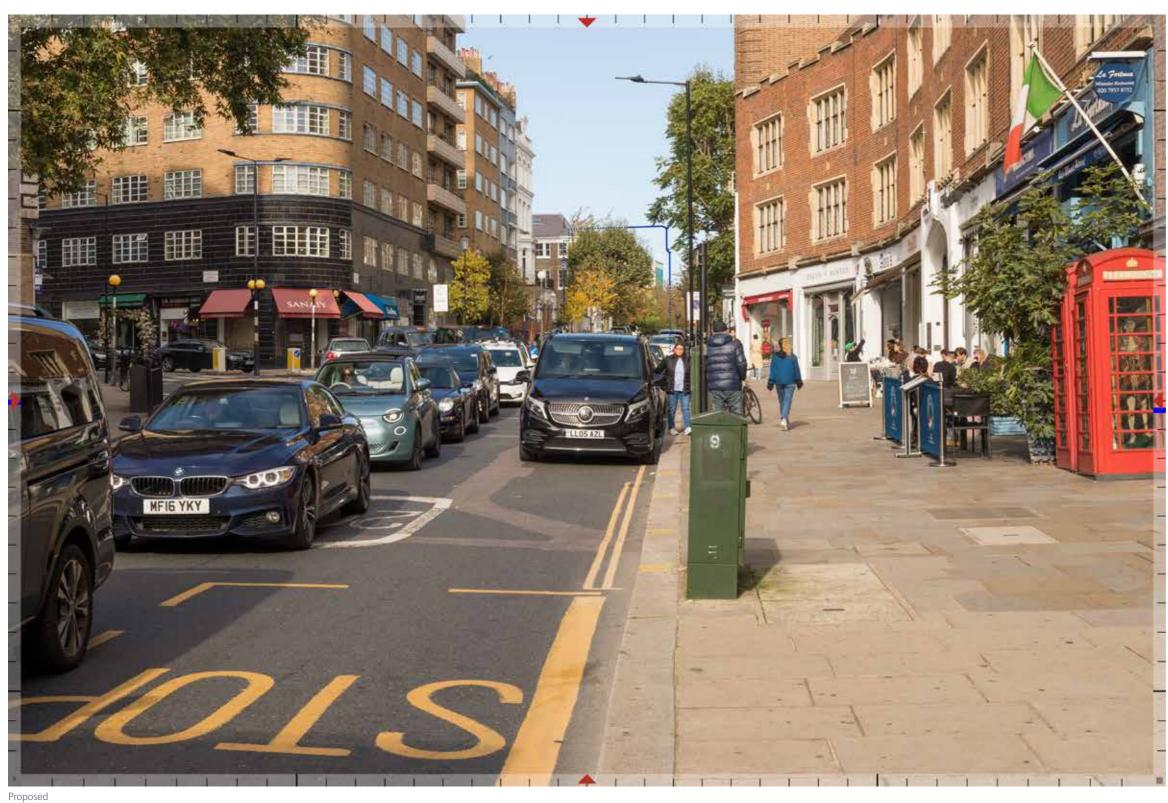


Existing



Existing

- 6.15 This viewpoint is located approximately 520m south of the Site, on the eastern side of Kensington Church Street and looking north in the direction of the Site. It is located within the Kensington Palace Conservation Area.
- 6.16 The Kensington Conservation Area is across the road to the west (left in this image), with the listed Church of Our Lady of Mount Carmel opposite the viewer (largely out of shot beyond the left edge of the image). There are two listed telephone boxes visible on the eastern side of the road.
- 6.17 The townscape comprises an eclectic mix of periods, architectural styles and scales, with brick a common facing material. Newcombe House can be seen in the middle distance, partially concealed by foreground trees; it has $\boldsymbol{\alpha}$ negligible impact on the townscape, although it would be more visible in winter.
- 6.18 This view is of **medium** sensitivity.



Proposed

The Proposed Development would be partially visible in the middle distance. While it would have a modestly greater apparent scale than the existing Newcombe House, its apparent height would remain lower than that of the foreground buildings, and it would be partially concealed by trees. It would lie in the background of the view, separate and distinct from the more historic townscape in the foreground.

There would be no significant change to the character and quality of the view. While the Proposed Development would be slightly more visible in winter, it would remain screened by tree branches to a considerable extent, and the overall magnitude of impact would not change.

Magnitude of impact: low

Scale and nature of effect: minor, beneficial

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Cumulative

There would be no cumulative schemes visible in this view, and the effect would be unchanged compared to that for the Proposed Development considered on its own.

Magnitude of impact: low

Scale and nature of effect: minor, beneficial

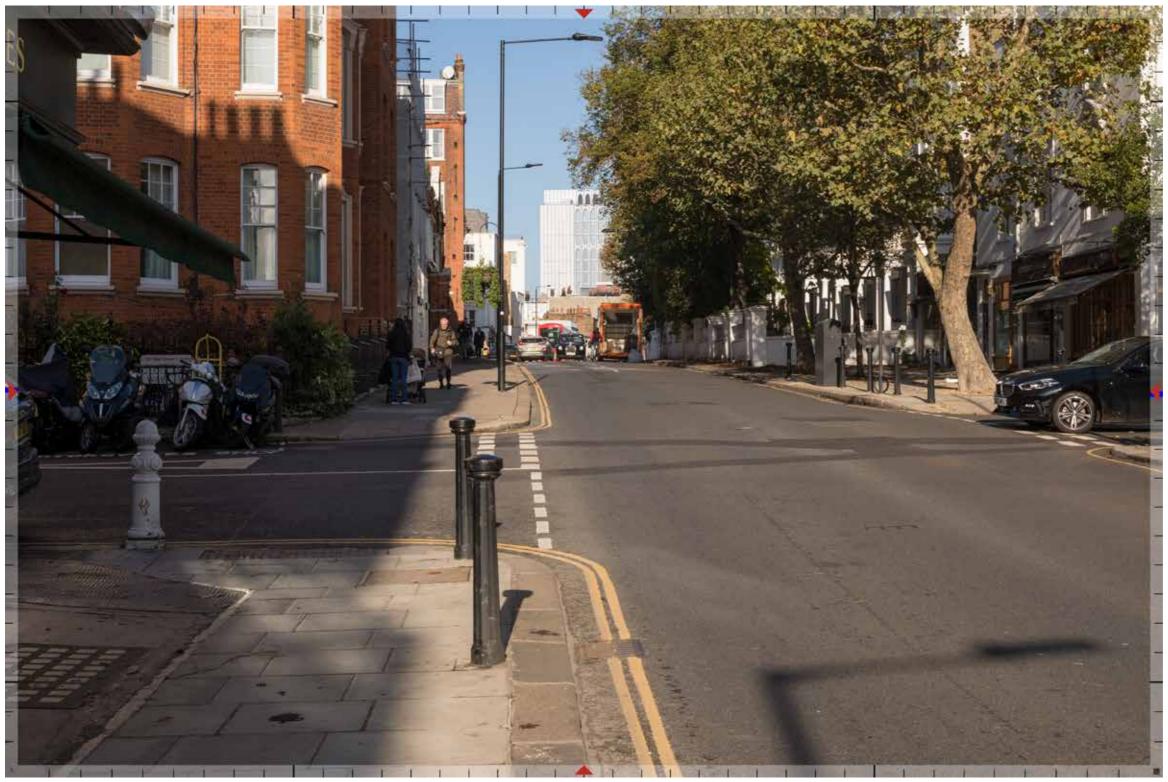


Existing



Existing

- 6.22 This viewpoint is located approximately 350m south of the Site on the western side of Kensington Church Street and is looking north. It is located within the Pitt Estate sub-area of the Kensington Conservation Area. Early 19th century listed commercial buildings within the Conservation Area are located on the west side of the road in the foreground (largely out of shot, other than the shop canopy), with the red brick and stone apartment building of Campden House Court prominent on the northern side of Gloucester Walk. Kensington Palace Conservation Area, lined largely by stucco houses behind front gardens with some ground floor retail development, lies to the east of the road (right).
- 6.23 The view moving into the middle distance is framed by the relatively consistent four-five storey mixed-use commercial/residential buildings to the east and the taller late 19th century interventions to the west. There is an almost continuous avenue of trees to the east.
- 6.24 Newcombe House lies at the end of the street vista, partially concealed by trees. It appears as a drab element within the townscape.
- 6.25 This is α view of **medium** sensitivity.



Proposed

Proposed

The Proposed Development would appear in the middle distance, terminating the vista along the street. While the Newcombe Tower would have a modestly greater apparent scale than the existing Newcombe House, its apparent height would remain lower than that of the foreground buildings, and it would be partially concealed by trees. The Proposed Development would lie in the background of the view, separate and distinct from the more historic townscape in the foreground.

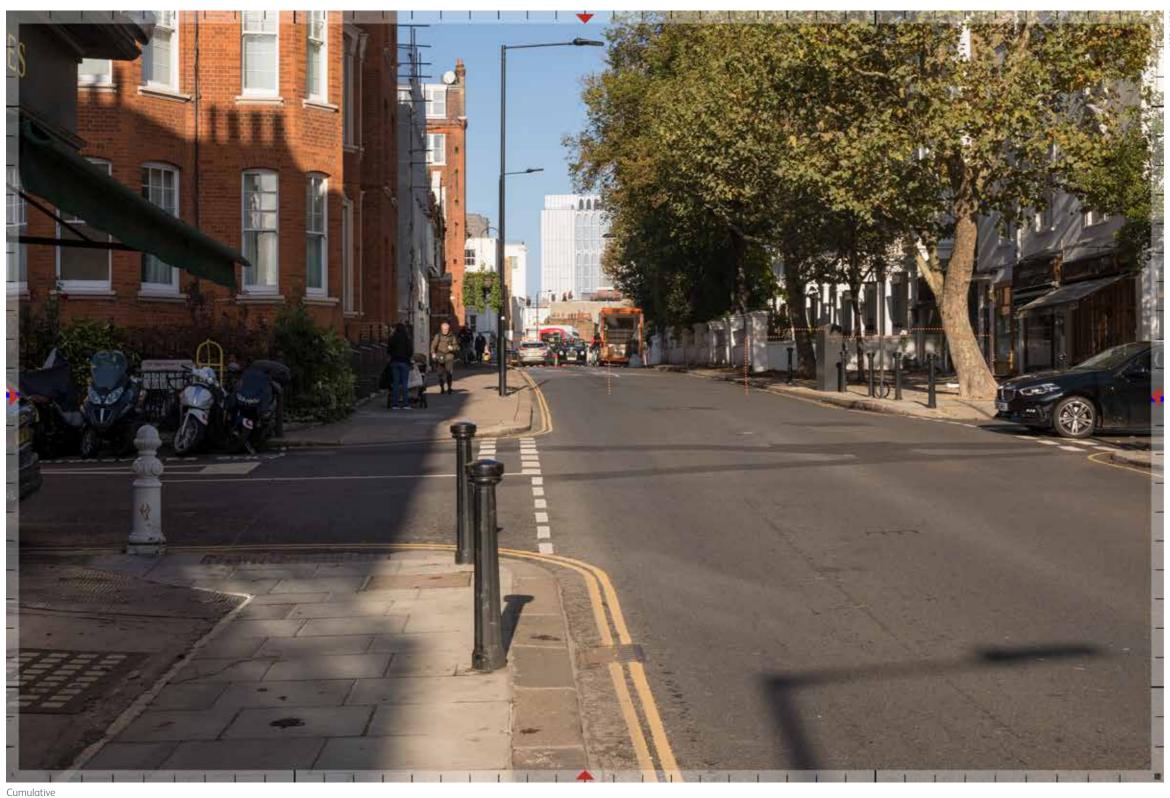
As a focus for the view, the Proposed Development would be of substantially higher quality than the existing buildings on the Site. The expression of the Newcombe Tower as being formed of three linear elements would be apparent to some extent and would provide it with a distinctive form. The architecture would have a clear sense of order, with window bays arranged in a regular manner, and the elevations would have a vertical emphasis. The frontages of the Proposed Development would have a considerably greater sense of depth and articulation than those of the existing building.

While the Proposed Development would be slightly more visible in winter, it would remain screened by tree branches to a considerable extent, and the overall magnitude of impact would not change.

Magnitude of impact: low

Scale and nature of effect: minor, beneficial



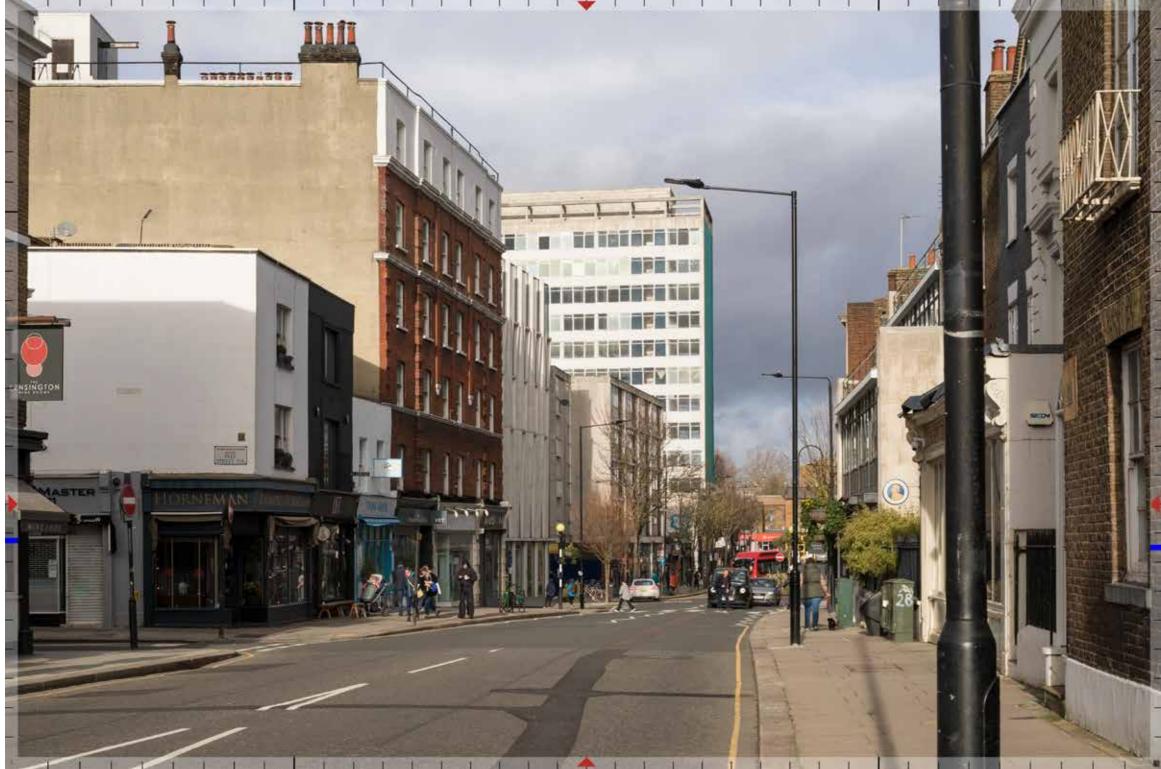


Cumulative

There would be no cumulative schemes visible in this view, and the effect would be unchanged compared to that for the Proposed Development considered on its own.

Magnitude of impact: low

Scale and nature of effect: minor, beneficial

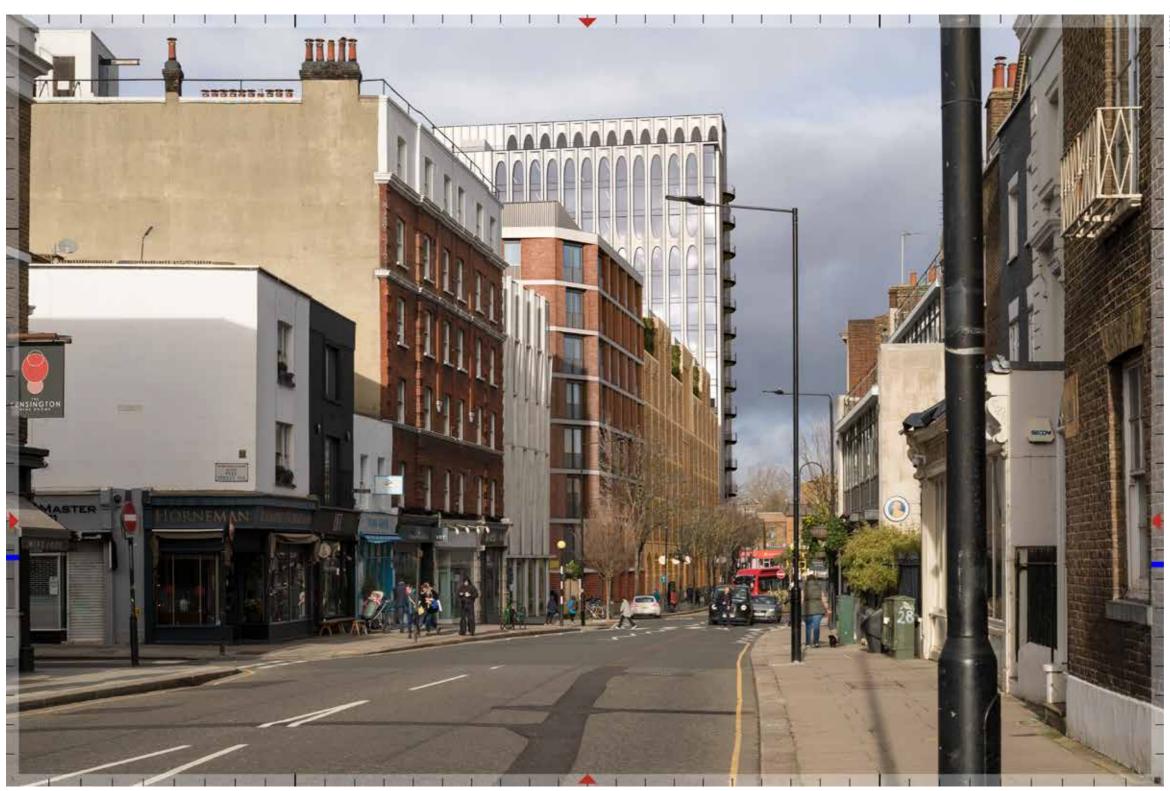


Fyisting



Existing

- This viewpoint is located approximately 90m south of the Site and is located on the eastern side of Kensington Church Street, looking north in the direction of the Site. The Kensington Conservation Area covers the western side of the street (left in this image) as far as the Site, and the eastern side of the street (right in this image), including the viewpoint, is within the Kensington Palace Conservation Area,
- 6.31 Listed early and mid-19th century domestic houses and commercial premises lie on the eastern side of the road, those close to the viewpoint seen obliquely, and those further into the middle distance mostly out of shot as the road bends. Buildings are diverse in character, but generally lower in scale at the northern end of the street, with a mixture of two, three and four storey buildings.
- The western side of the road is lined by development that is varied in age, scale, style and appearance, from two or three storey 18th or 19th century buildings, to the six storey red brick apartment building of Campden Hill Mansions, to a six storey modern development immediately south of the Site.
- Newcombe House, located outside but immediately adjacent to the Kensington Conservation Area, defines the junction with Notting Hill Gate in the near distance. A large proportion of its south-facing elevation and repeating horizontal bands of windows are visible. The lower run of buildings on the Site are also visible, partially screened by trees. Overall, the appearance of the existing buildings on the Site is drab and detracts from the quality of the view.
- 6.34 This view is of **medium** sensitivity.



Proposed

The Proposed Development would appear on the western side of Kensington Church Street, towards the centre of the view. It would be of substantially higher quality than the existing buildings on the Site, and the new Newcombe Tower would form a high quality focal point at the end of the street.

While the new Newcombe Tower would have a somewhat greater apparent scale than the existing Newcombe House, its apparent height would remain similar to that of Campden Hill Mansions further in the foreground of the view and would sit comfortably within the view overall. The positioning and orientation of the tower within the Proposed Development would be such that it could be understood to be located on a junction and addressing a main road condition, and it would appear separate and distinct from the townscape in the foreground, including that which is historic in nature.

The KCS Office Block and Medical/ Affordable Block within the Proposed Development would form an intermediary scale between the Newcombe Tower and the existing development to the south of the Site.

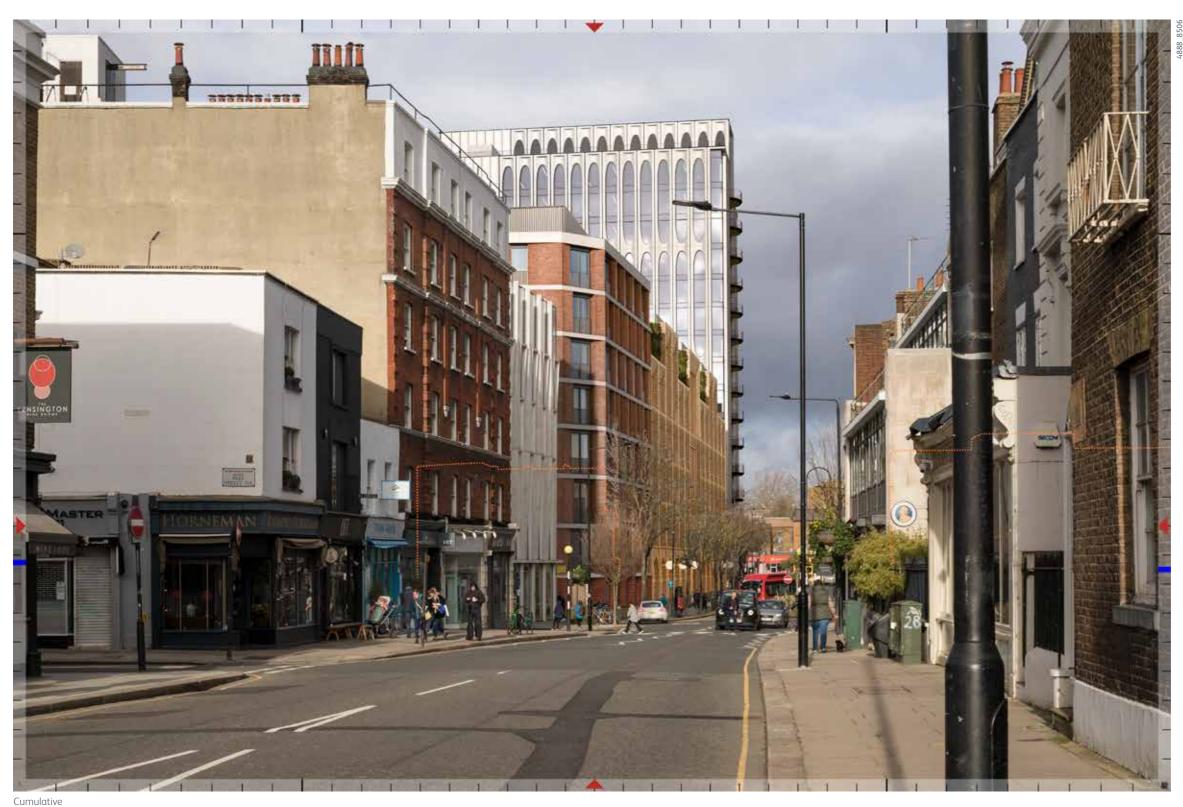
The expression of the Newcombe Tower within the Proposed Development as being formed of three linear elements of different heights would be partially evident from this point, providing it with a distinctive stepped profile on the skyline. The architecture would have a clear sense of order, with window bays arranged in a regular manner, and elevations with a vertical emphasis. The frontages of the Newcombe Tower would have a considerably greater sense of depth and articulation than those of the existing building and the elliptical profiling of the frame around its frontages would provide detailed visual interest that could be appreciated at this range.

The brick frontages of the KCS Block and Medical/ Affordable Block would relate well to the existing buildings in the view, and their frontages would have depth and articulation which would enliven the street scene compared to the drab existing buildings on the Site.

Magnitude of impact: high

Scale and nature of effect: major, beneficial

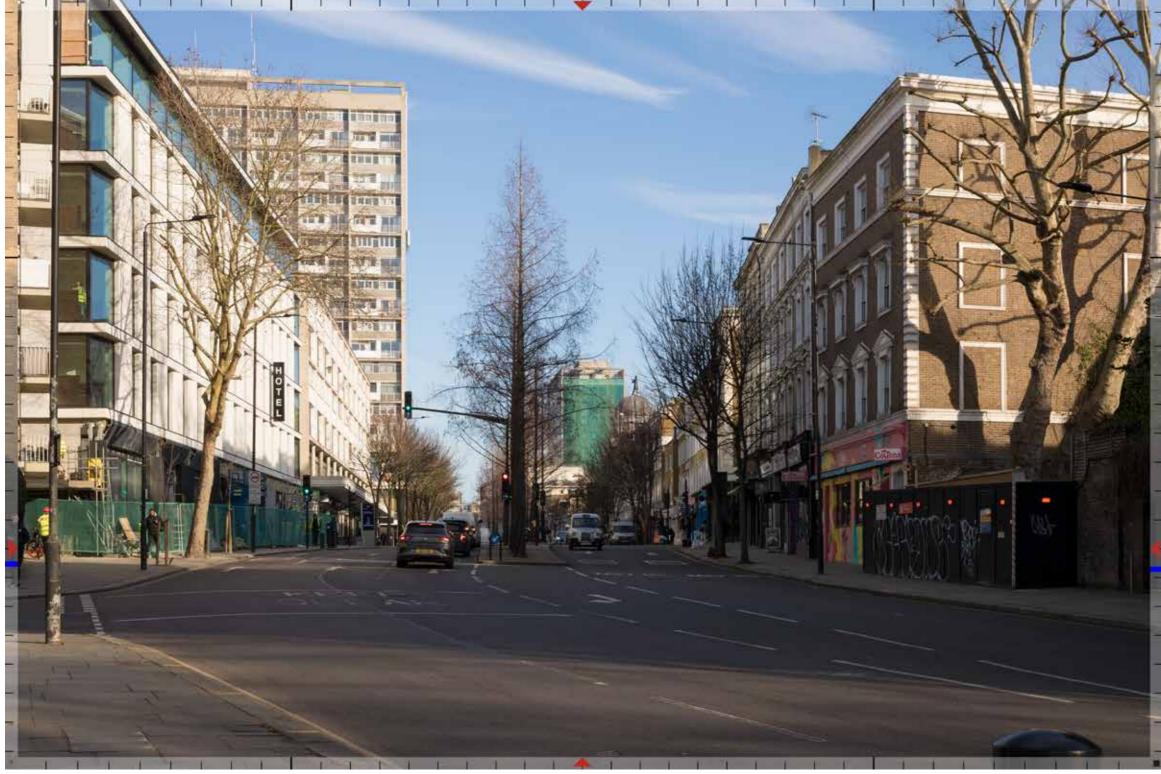




There would be no cumulative schemes visible in this view, and the effect would be unchanged compared to that for the Proposed Development considered on its own.

Magnitude of impact: high

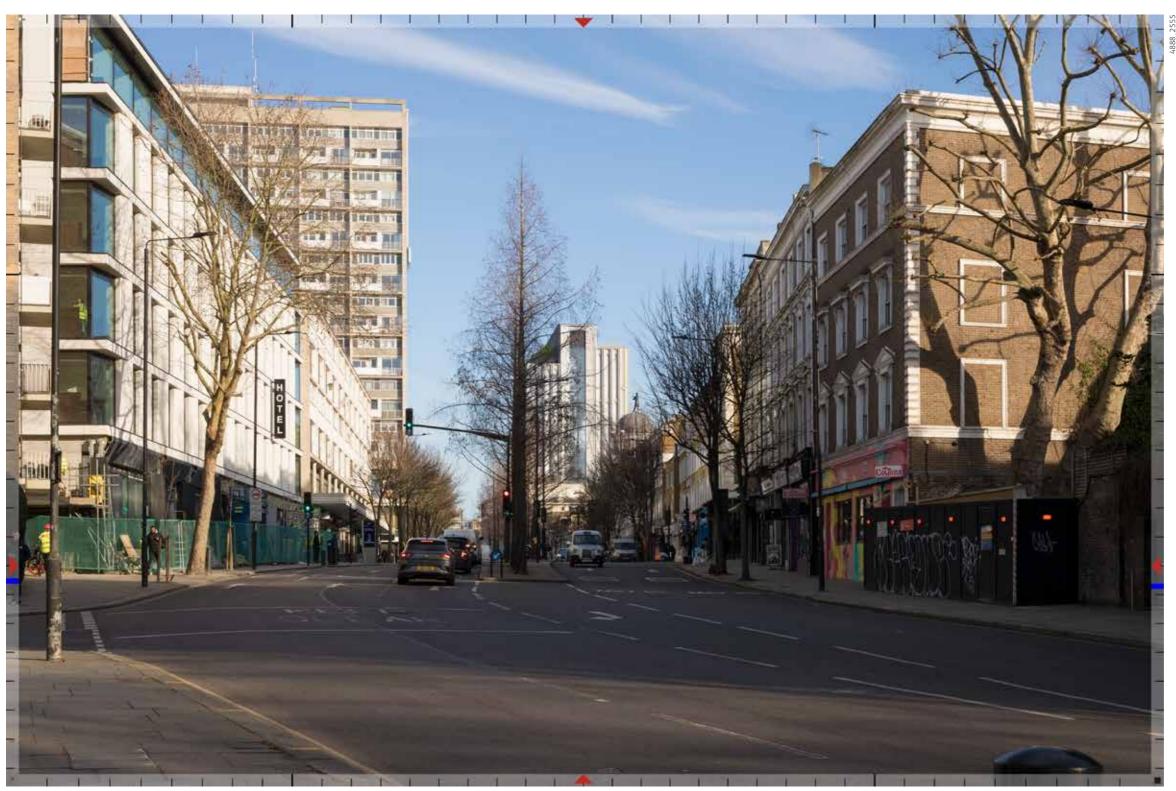
Scale and nature of effect: major, beneficial



Existing



- This viewpoint is located on the northern side of Holland Park Avenue, west of the junction with Ladbroke Terrace, from which point eastwards it becomes Notting Hill Gate. The view is looking east in the direction of the Site and the viewpoint is located approximately 350m west of the Site.
- The edge of an existing post-war residential block frames the north side (left) of the view, set within the Ladbroke Conservation Area, with a new hotel development under-construction beyond. The Campden Hill Tower rises in the middle ground of the view to the left of centre. Trees on the pavement edge line Holland Park Avenue/ Notting Hill Gate and partially screen the listed Coronet Cinema, 1 Holland Park Avenue and the mostly four/five storey early 19th century development located at the northern edge of the Kensington Conservation Area, on the south side of the street (right side of the view).
- 6.43 Newcombe House is seen in the middle distance, its western end discernible between the trees. This is a robust townscape environment in which large 20th century buildings predominate and the existing building, while drab in appearance, is not out of character within it. Its orientation is set at 90 degrees to that of Campden Hill Tower, creating a dynamic visual relationship between these two buildings which could be understood to define the heart of the Notting Hill Gate District Centre.
- 6.44 This is a view of low-**medium** sensitivity.



Proposed

The new Newcombe Tower within the Proposed Development would appear in the middle distance, towards the centre of the image. While it would have a somewhat greater apparent scale than the existing Newcombe House, its apparent height would remain lower than that of buildings in the foreground of the view, and much lower than that of Campden Hill Tower. The Proposed Development would appear separate and distinct from the historic townscape in the foreground.

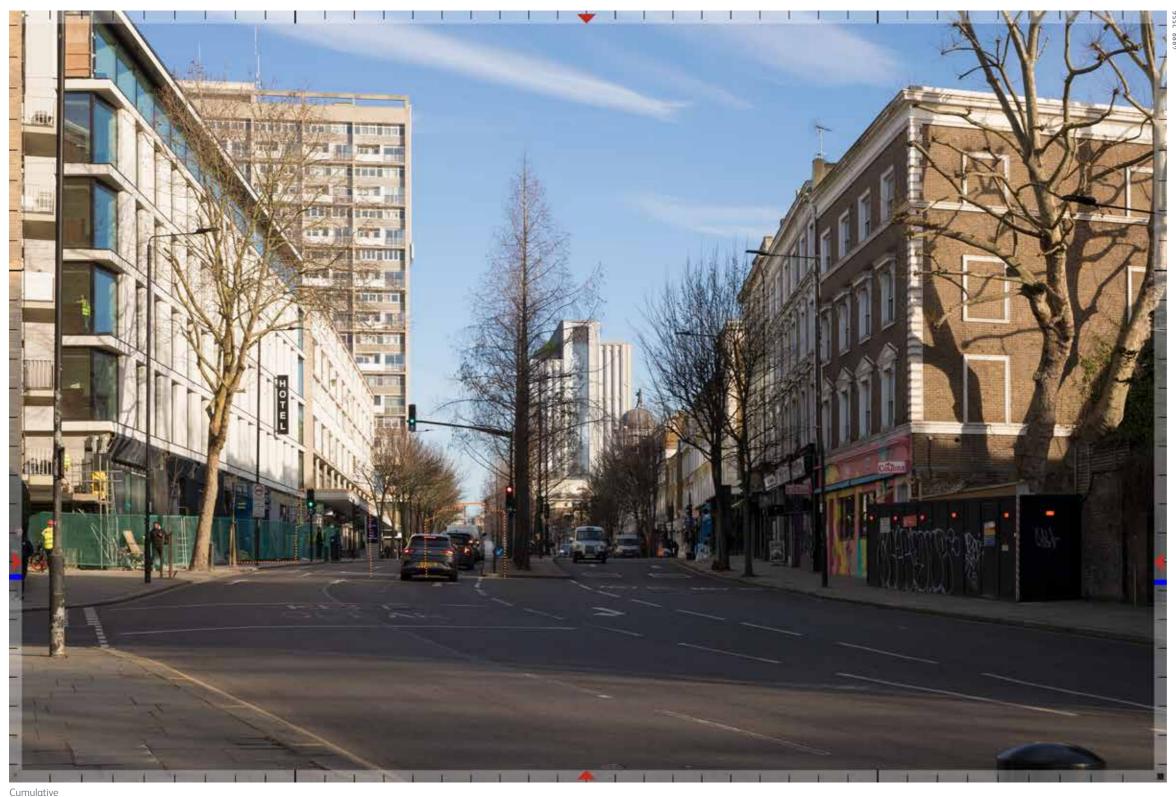
The positioning and orientation of the tower within the Proposed Development would be based on that of the existing building on the Site and would reinforce the existing dramatic visual dialogue with Campden Hill Tower.

The Proposed Development would be of substantially higher quality than the existing building on the Site. The expression of Newcombe Tower as being formed of three linear elements of different heights would provide it with a distinctive form and an interesting profile on the skyline. The architecture would have a clear sense of order, with bays arranged in a regular manner and the taller central linear element expressed differently, with extensive glazing, such that it would provide variety to this western frontage. The use of elliptical profiled cladding on the window bays would provide the frontage with a considerably greater sense of depth and articulation than that of the existing building.

Considerably less of the Proposed Development would be visible in summer, and it would have a lower magnitude of impact as a result.

Magnitude of impact: medium (winter), low-medium (summer)

Scale and nature of effect: moderate (winter), minor-moderate (summer), beneficial

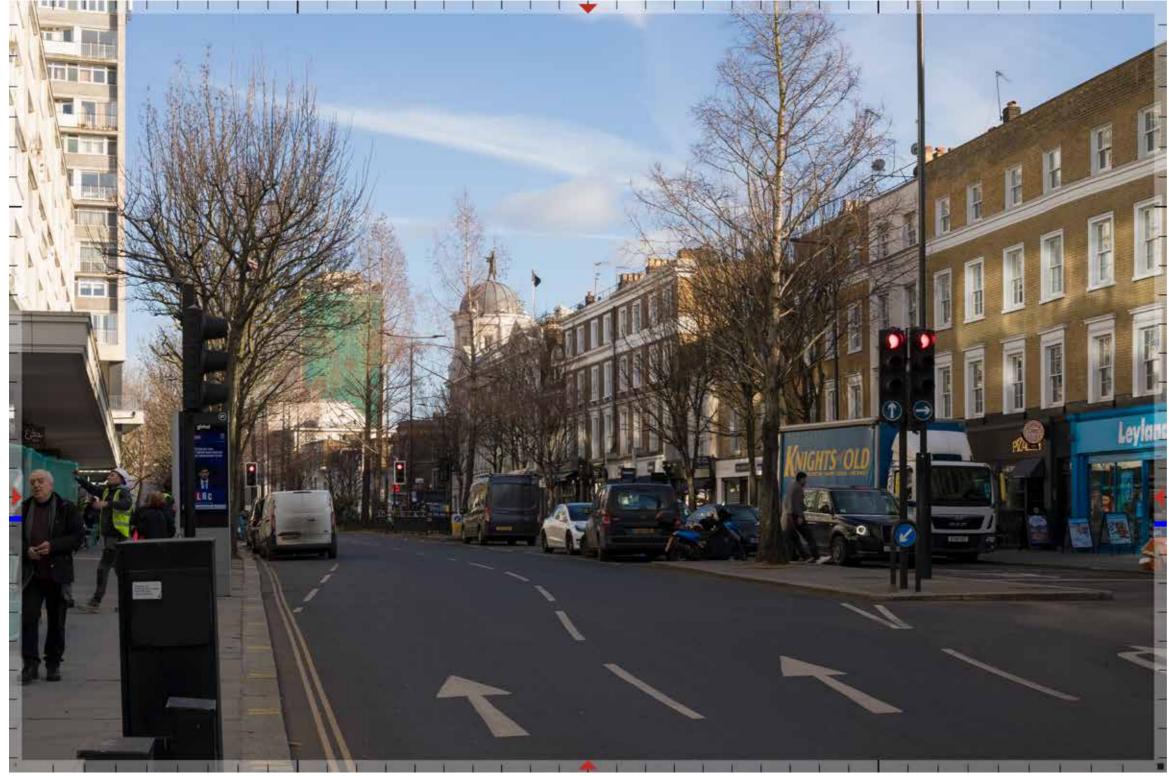


The cumulative scheme at 146-164 Notting Hill Gate, including a hotel use, is visible on the northern side of the road, and it can be seen that this scheme was at an advanced stage of construction at the time of this image. It has a linear form and is medium rise such that it would be consistent with the existing townscape character of the District Centre, in which the Proposed Development and Campden Hill Towers appear as the principal tall vertical elements, contrasting with lower scale and horizontally emphasised buildings.

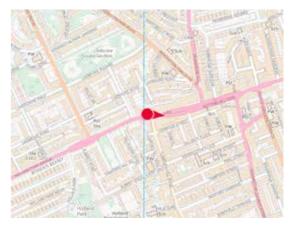
The cumulative scheme at Astley House would be visible in the middle distance, to a small extent. It would have little visual impact but to the extent it would be seen it would consolidate the existing character of the view.

Magnitude of impact: medium (winter), low-medium (summer)

Scale and nature of effect: moderate (winter), minor-moderate (summer), beneficial



Existing



- This view is located on the northern side of Notting Hill Gate, within the area excluded from the Ladbroke Conservation Area, and is looking east in the direction of the Site and the Northern Corridor sub-area of the Kensington Conservation Area on the southern side of the road. It is located approximately 250m from the Site.
- The dome of the listed Coronet Cinema, which lies within the Conservation Area, lies at the centre of the view, albeit screened by trees to some extent. The similarly listed Gate Cinema is barely visible as it is largely hidden by foliage. Newcombe House lies beyond, also screened by trees to a significant extent. Its overall form and undifferentiated massing can, however, be discerned.
- Otherwise, the District Centre is framed by largely four storey mid-19th century brick and stucco buildings to the south and the mid-20th century large-scale concrete buildings to the north, including Campden Hill Tower at the left edge of the view. This is a robust townscape environment with a mixed character.
- 6.54 This is a view of **low-medium** sensitivity.



Proposed

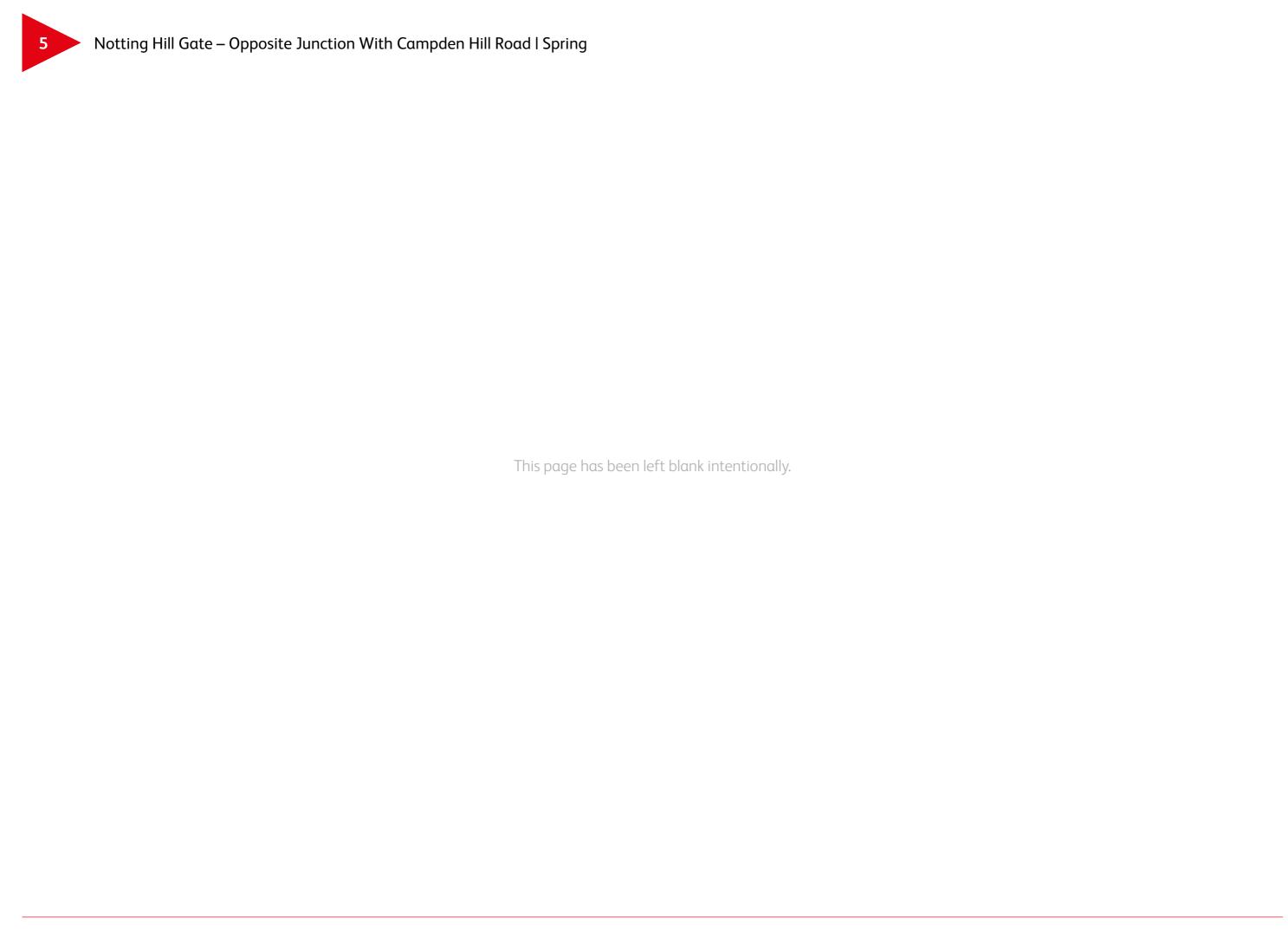
6.55 The Proposed Development would appear in the near to middle distance, albeit screened by tree branches to a significant extent. While it would have a somewhat greater apparent scale than the existing Newcombe House, the proposed Newcombe Tower's apparent height would remain much lower than that of Campden Hill Tower and would sit comfortably within the view overall. The Proposed Development would appear separate and distinct from the historic townscape in the foreground.

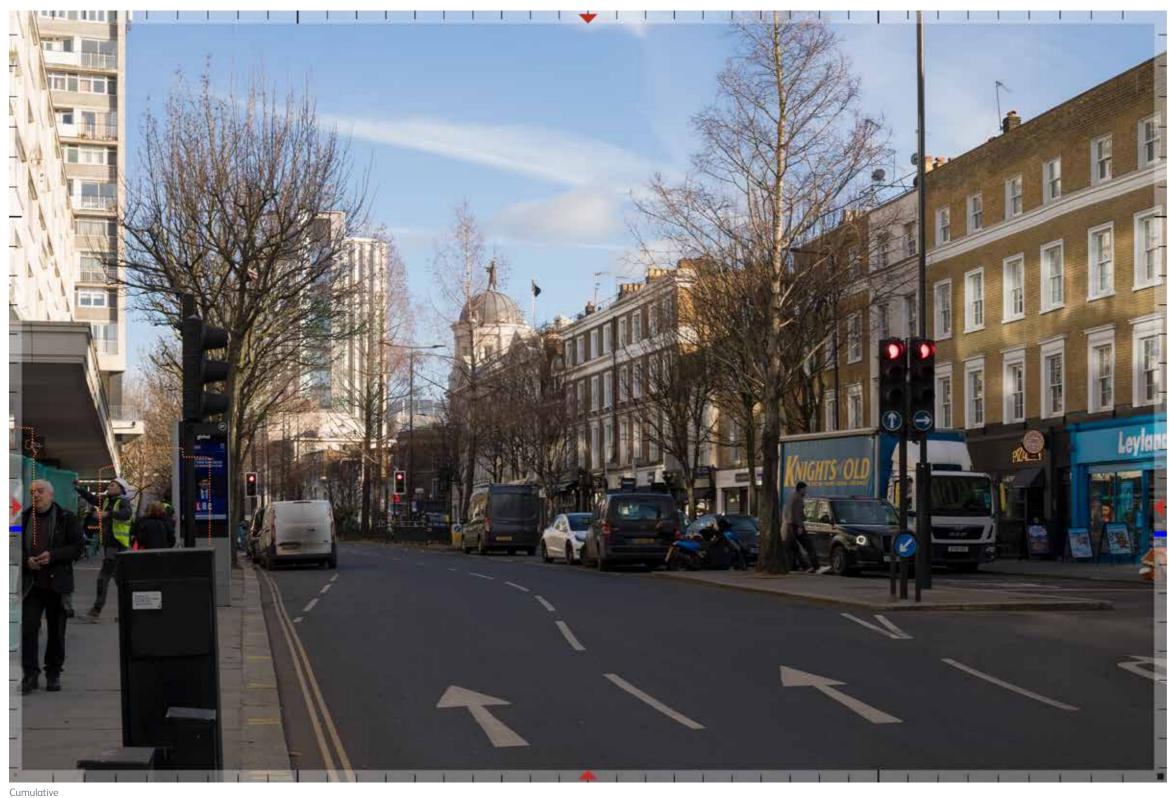
The Proposed Development would be of substantially higher quality than the existing building on the Site. The expression of the Newcombe Tower within the Proposed Development as being formed of three linear elements of different heights would provide it with a distinctive form and interesting profile on the skyline, and it would contrast favourably with the undifferentiated massing of the existing tower on the Site. The architecture would have a clear sense of order, with window bays arranged in a regular manner. The frontages of the Proposed Development would have a considerably greater sense of depth and articulation than those of the existing building.

Considerably less of the Proposed Development would be visible in summer, and it would have $\boldsymbol{\alpha}$ lower magnitude of impact as a result.

Magnitude of impact: low-medium (winter), low (summer)

Scale and nature of effect: minor-moderate (winter), minor (summer), neutral

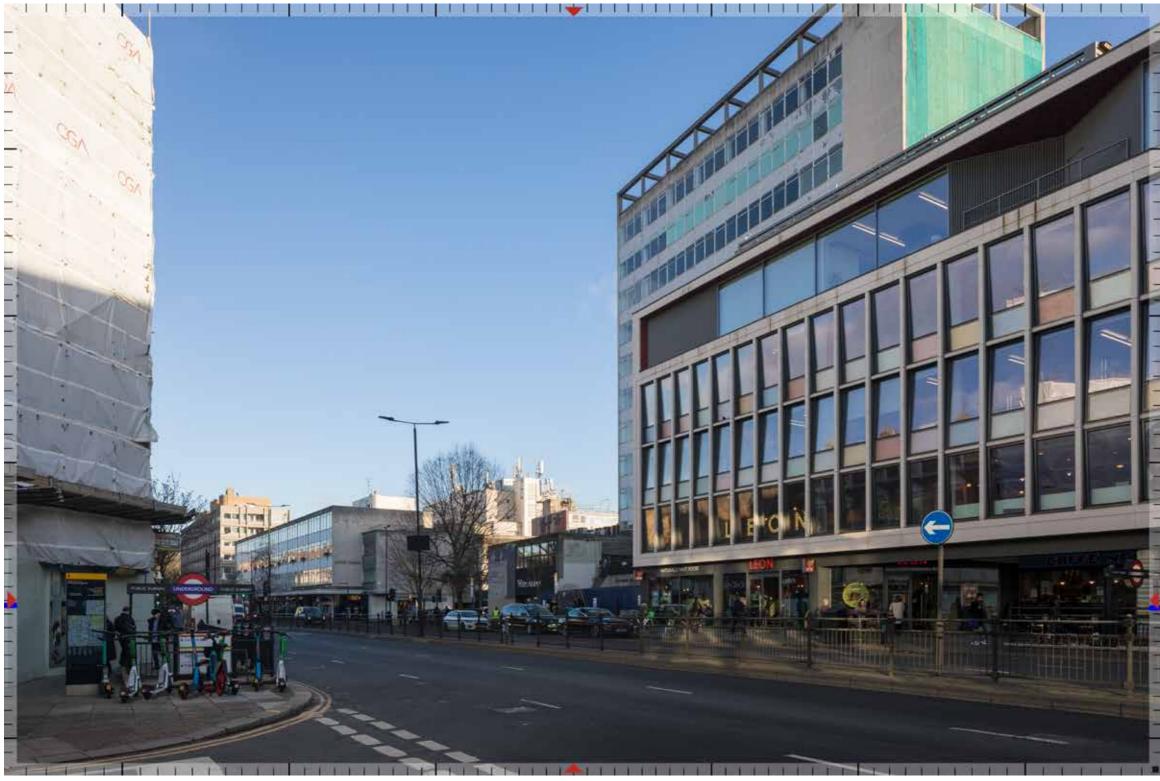




6.58 While the cumulative scheme at Astley House would be visible in the middle distance, it would be screened by tree branches to the extent that it would be barely discernible. The effect of the Proposed Development in this cumulative scenario would remain the same as when considered on its own.

> Magnitude of impact: low-medium (winter), low (summer)

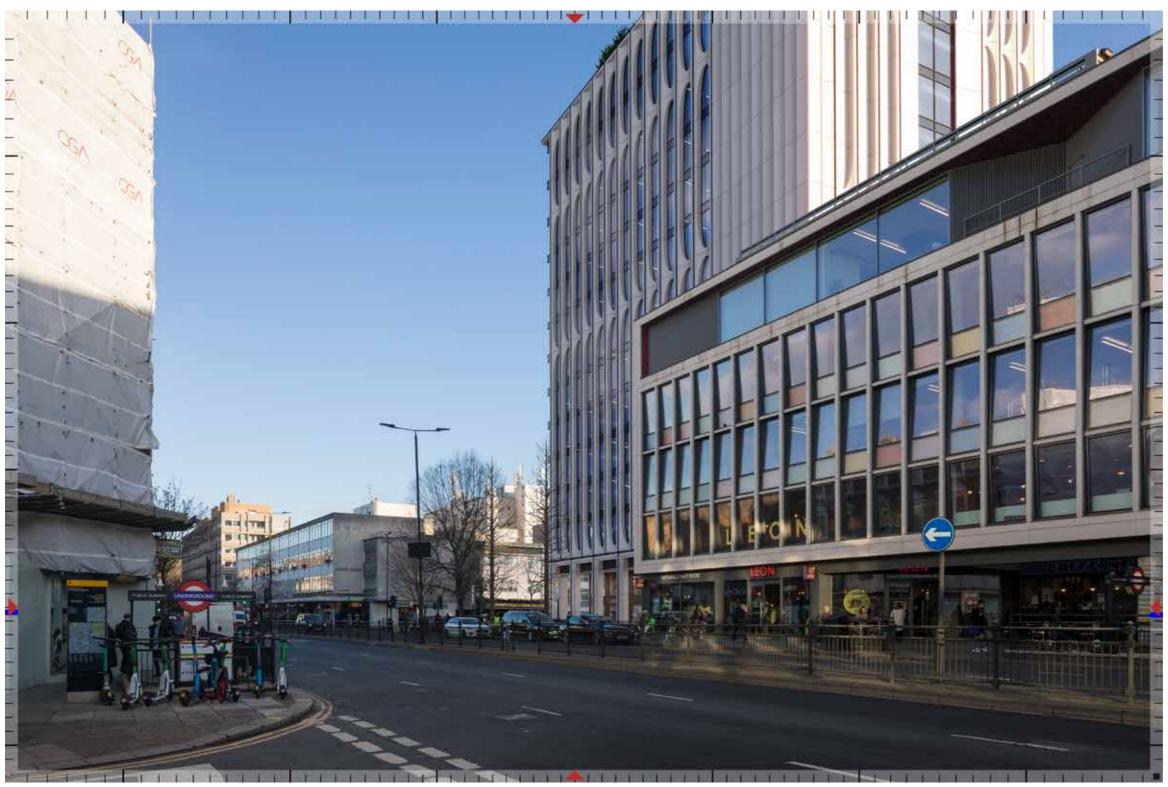
> Scale and nature of effect: minor-moderate (winter), minor (summer), neutral







- This viewpoint is located on the northern side of Notting Hill Gate at its junction with Pembridge Road, just outside the Pembridge Conservation Area. It is located approximately 100m northwest of the Site.
- The visible areas within the view are largely excluded from the surrounding conservation areas. The south side of Notting Hill Gate is fronted almost entirely by buildings of the post-war years with the recently remodelled David Game House forming the foreground on the right side of the image, with Newcombe House behind it. Astley House and the Czech Republic Embassy lie further east, left in the image.
- The townscape of this part of the District Centre, in TCA 1, is robust; none of the 20th century buildings in the view are of particular architectural merit. Newcombe House, the tallest building in the view, is set back from the Notting Hill Gate commercial frontage, and it is unclear from this view location what it is landmarking. The public realm in front of it can be seen to be of low quality.
- 6.62 This is a view of **low** sensitivity.



Proposed

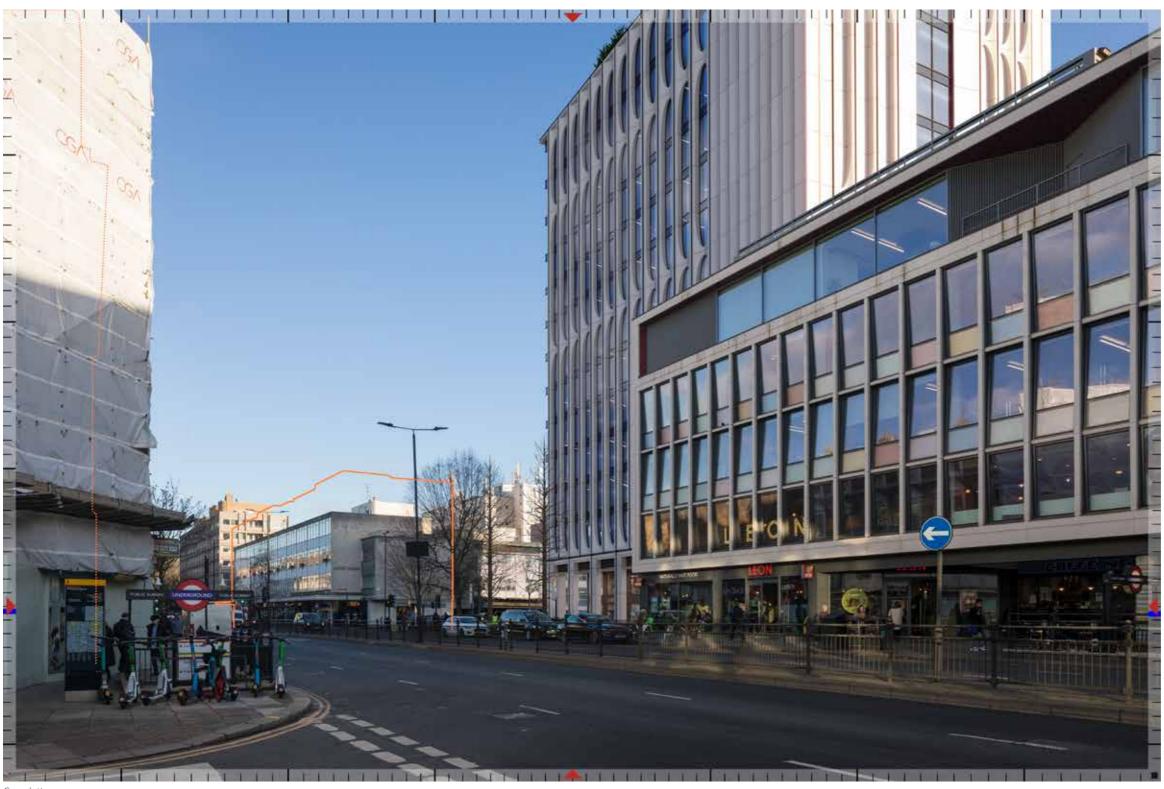
The Proposed Development would appear prominently on the opposite side of the road. While it would have a somewhat greater apparent scale than the existing Newcombe House that it would replace, the change in scale would not be overwhelming and it would retain the existing building's orientation.

The Proposed Development would be of substantially higher quality than the existing building on the Site. A viewer in this location would be able to raise their eyes to see the top of the building and could therefore appreciate its expression as being formed of three linear elements of different heights, which would provide it with a distinctive form and interesting profile on the skyline. This would contrast favourably with the undifferentiated massing of the existing tower on the Site. The architecture would have a clear sense of order, with window bays arranged in a regular manner. The frontages of the Proposed Development would have a considerably greater sense of depth and articulation than those of the existing building.

The space in front of the proposed Newcombe Tower would be clearly visible at this close range to the Site (albeit obscured by traffic in this image) and the proposed repaving, planters and soft landscaping would result in $\boldsymbol{\alpha}$ significantly improved public space.

Magnitude of impact: high

Scale and nature of effect: moderate-major, beneficial

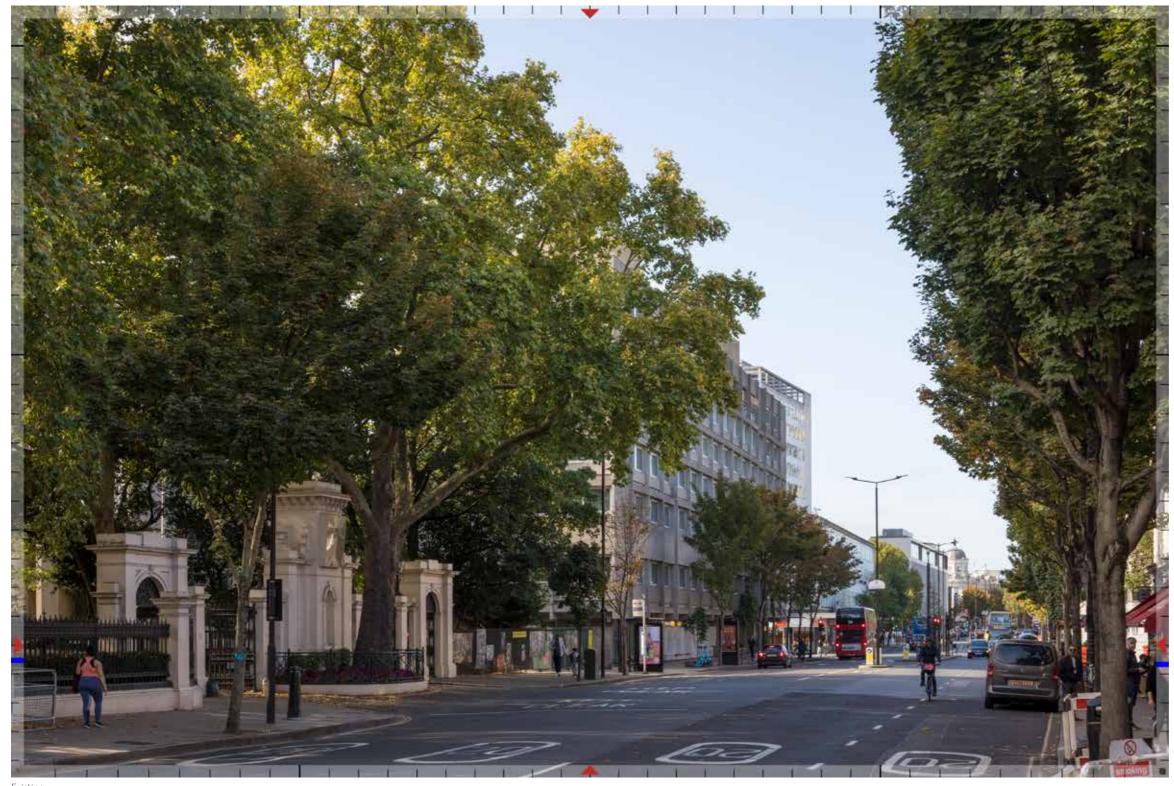


Cumulative

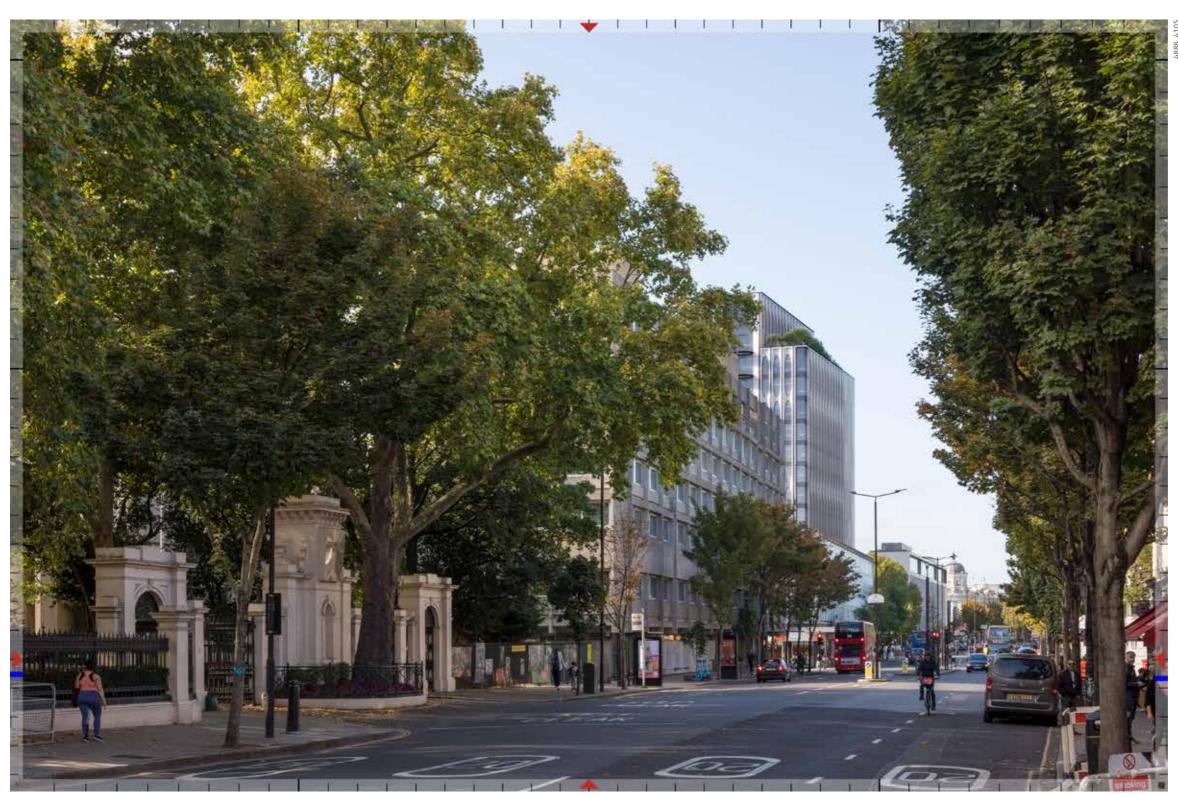
The cumulative scheme at Astley House would be visible to the east of the Proposed Development, and the cumulative scheme at 66-74 Notting Hill Gate would be visible in the foreground of the view, to the north of the Proposed Development (both left of the Proposed Development in this image). Together with the Proposed Development, these cumulative schemes would reinforce the existing character of the view as including medium and large scale post-war and modern buildings seen within a district centre, main road condition.

Magnitude of impact: high

Scale and nature of effect: moderate-major, beneficial



- 6.67 This view from the northern side of Bayswater Road at its junction with Ossington Street is within the Bayswater Conservation Area in Westminster, at the western edge of that Conservation Area, and close to the eastern boundary of the Pembridge Conservation Area. It is located approximately 240m east of the Site.
 - Kensington Palace Gardens the entrance to which is identified by its listed stucco gates is in the Kensington Palace Conservation Area and is to the south (left), largely out of shot in this image, with the seven-storey concrete post war neo-Brutalist Czech Embassy building beyond.
 - Newcombe House is mostly hidden by the Czech Embassy building and Astley House, but is partially visible as a set-back slab block. In the far distance is the domed tower of the listed Coronet cinema located within the Kensington Conservation Area.
- 6.70 This is view of **low-medium** sensitivity.



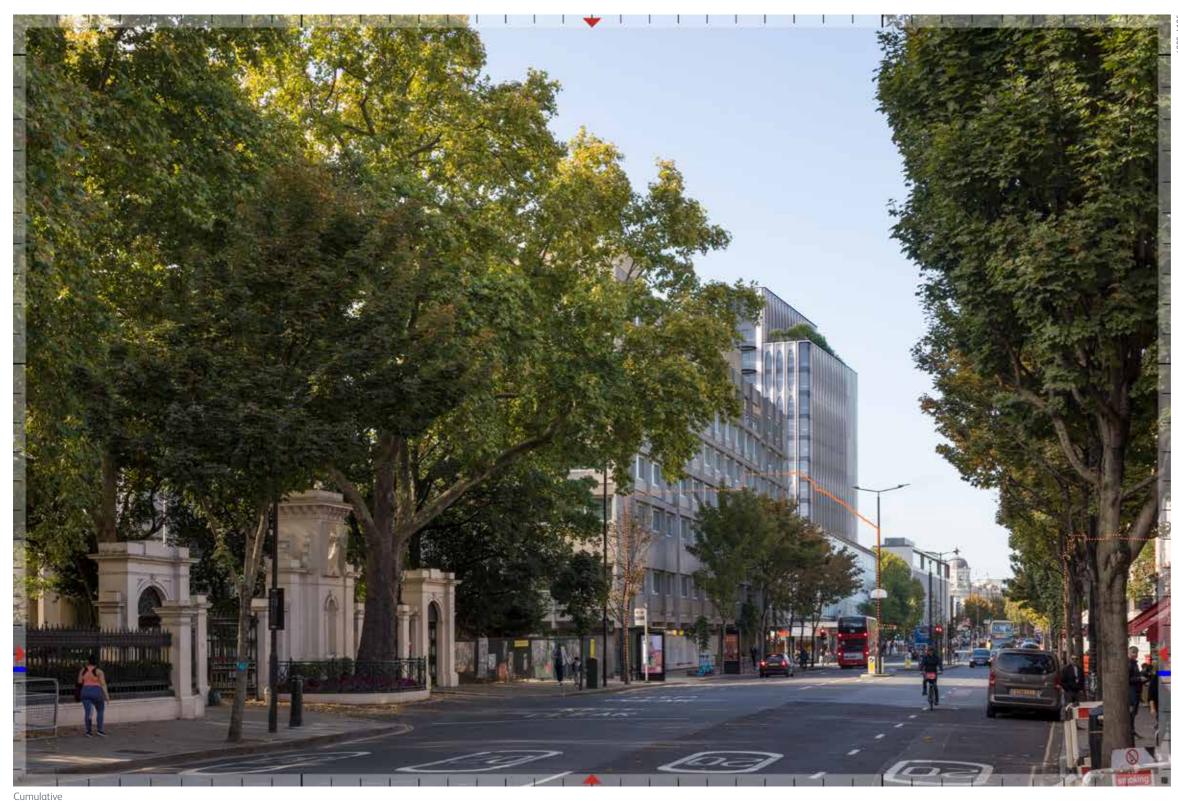
Proposed

The Proposed Development would appear in the near to middle distance, partly screened by tree branches at its upper levels (but not to the extent that its overall magnitude of impact would change in winter). While it would have a somewhat greater apparent scale than the existing Newcombe House, its apparent height would be similar to that of the Czech Embassy building, and would sit comfortably within the view overall. The Proposed Development would appear separate and distinct from the more historic townscape on the northern side of the road, and further in the background of the view.

The Proposed Development would be of substantially higher quality than the existing building on the Site. The expression of the Proposed Development as being formed of three linear elements of different heights would provide it with a distinctive form and would contrast favourably with the undifferentiated massing of the existing tower on the Site. The architecture would have a clear sense of order, with window bays arranged in a regular manner horizontally, and arranged into progressively smaller groups vertically. The frontages of the Proposed Development would have a considerably greater sense of depth and articulation than those of the existing building. The greenery proposed for the roof terrace of Level 14 of Newcombe Tower would be evident from this location, providing a soft landscape element at the upper levels of the building.

Magnitude of impact: medium

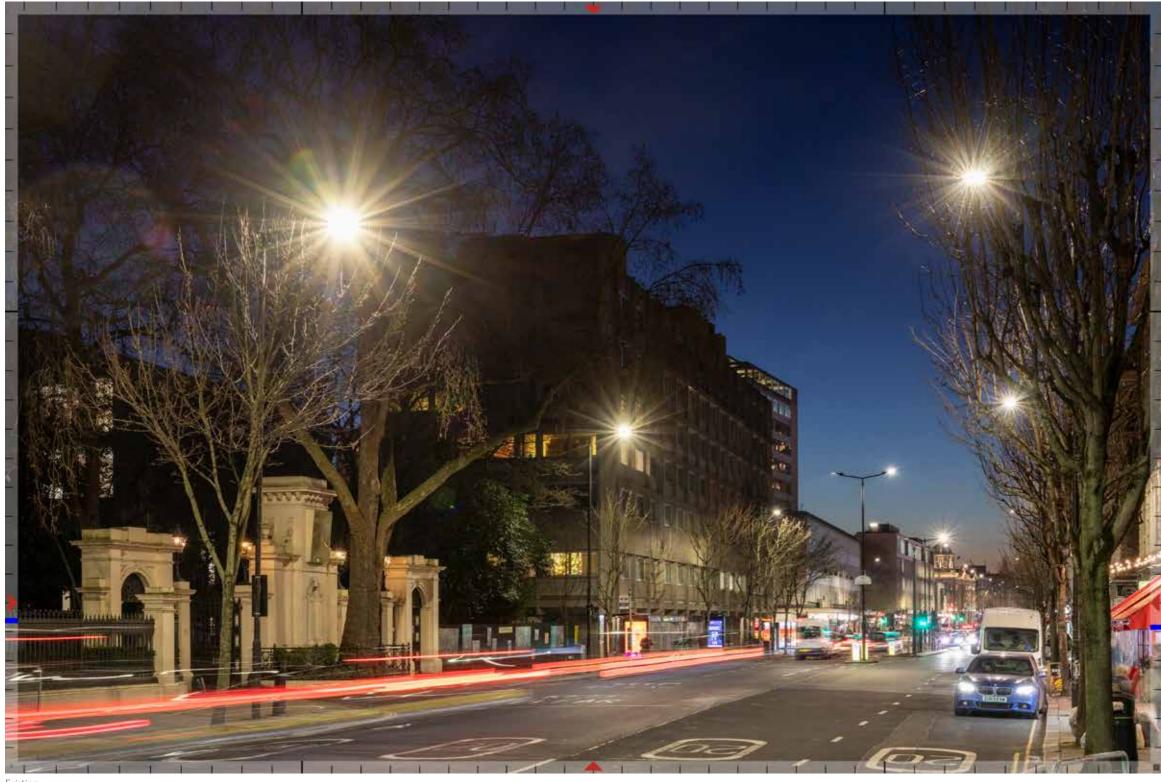
Scale and nature of effect: moderate, beneficial



The cumulative scheme at Astley House would be visible to the east of the Proposed Development, partly obscuring it, although not to the extent that the Proposed Development's magnitude of impact would be reduced. Together with the Proposed Development, Astley House would reinforce the existing character of the view as including medium and large scale post-war and modern buildings seen within a district centre, main road condition.

Magnitude of impact: medium

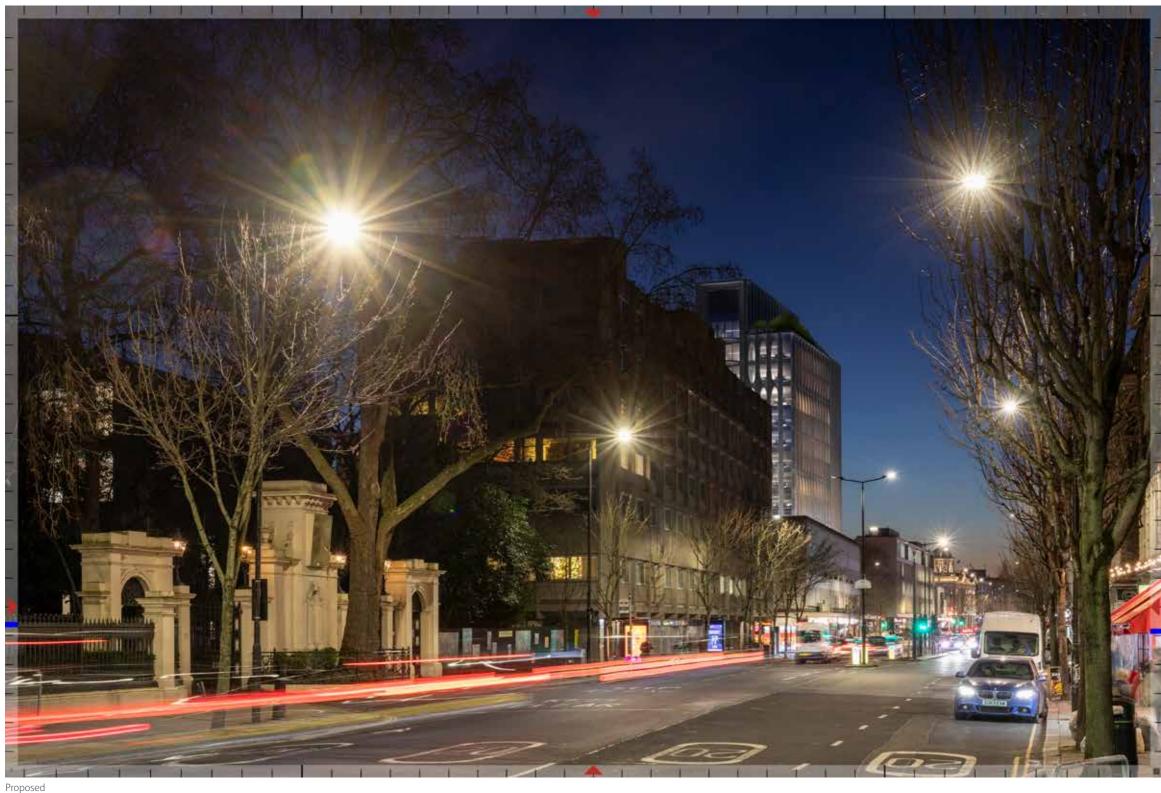
Scale and nature of effect: moderate, beneficial





- 6.74 The urban context within the view is as described for View 7. At night, the streetlights are the dominant form of external lighting within the view, although external lighting to shopfronts and to the Coronet Cinema are also visible. Internal lighting is visible within the Czech Embassy building. Other than its entrance gates, Kensington Palace Gardens appears as a darker area off the main road.
- 6.75 This is view of **low-medium** sensitivity.

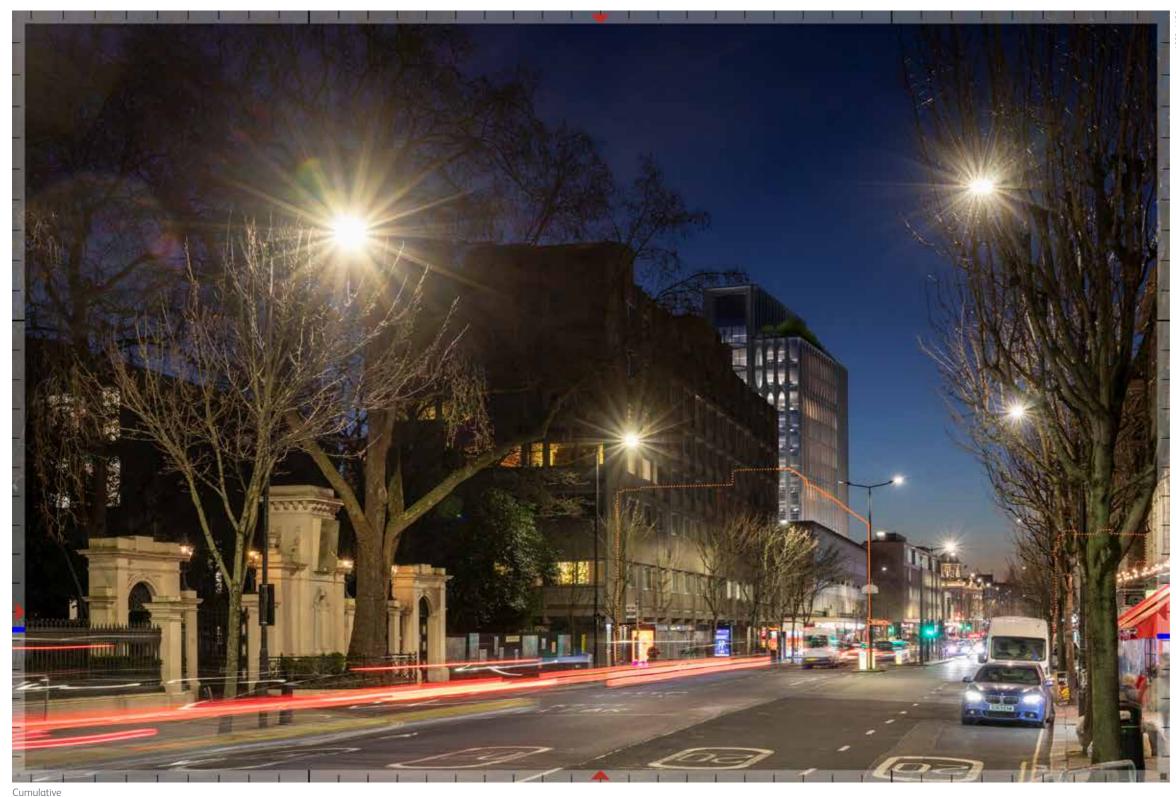
Existing



6.76 As with the daytime view, the Proposed Development would appear in the near to middle distance, partly screened by tree branches at its upper levels. Its appearance and visual impact would be broadly as described for the daytime view, albeit the detailed elevational approach would not be as visible at this distance. Nonetheless, the regular rhythm of the cladding frame would be apparent to some extent. Internal lighting within the office floors would be visible, in a similar manner to the Czech Embassy building. The streetlights would remain the dominant light source, and Kensington Palace Gardens would remain a darker area to the south of the viewpoint.

Magnitude of impact: medium

Scale and nature of effect: moderate, beneficial



Cumulative

6.77 The cumulative scheme at Astley House would be visible to the east of the Proposed Development, partly obscuring it, although not to the extent that the Proposed Development's magnitude of impact would be reduced. Together with the Proposed Development, Astley House would reinforce the existing character of the view as including medium and large scale post-war and modern buildings seen within a district centre, main road condition.

Magnitude of impact: medium

Scale and nature of effect: moderate, beneficial







- This viewpoint is located on the northern side of Notting Hill Gate at its junction with Linden Gardens, approximately 100m north-east of the Site. It is located within the Pembridge Conservation Area and historic development with projecting retail units within the Conservation Area can be seen to line the northern side of the road. The view look westwards along Notting Hill Gate towards the northern boundary of the Kensington Conservation Area and the listed Coronet and Gate Cinemas on the south (left) side of Notting Hill Gate: the dome provides a clear visual punctuation to the skyline of the street.
- Excluded from the conservation areas are the mid-20th century commercial blocks to the foreground left; Astley House, Newcombe House and David Game House beyond (the latter recently remodelled). Campden Hill Tower is set at right angles to the line of development to the north side of the street, towards the right edge of the image, and to the orientation of the existing Newcombe House; together, they have a dynamic visual dialogue as a result, and effectively mark the heart of the District Centre.
- 6.80 Although from within a conservation area, this view is dominated by large-scale 20th century development. It is of low-medium sensitivity.



Proposed

The Proposed Development would appear towards the centre of the image. While it would have a somewhat greater apparent scale than the existing Newcombe House, its apparent height would sit comfortably within the view overall, and its verticality would provide a welcome contrast with the long horizontally emphasised frontages of Astley House and David Game House. The Proposed Development would appear separate and distinct from the more historic townscape on the northern side of the road and further in the background of the view.

The positioning and orientation of the tower within the Proposed Development would be based on that of the existing building on the Site, and would reinforce the existing dramatic visual dialogue with Campden Hill Tower.

The Proposed Development would be of substantially higher quality than the existing building on the Site. The expression of the new Newcombe Tower within the Proposed Development as being formed of three linear elements of different heights would provide it with a distinctive form and interesting profile on the skyline, and would contrast favourably with the undifferentiated massing of the existing tower on the Site. The architecture would have a clear sense of order, with window bays arranged with a regular rhythm horizontally, and with windows arranged into progressively smaller groups vertically by the cladding frame. The elliptical profiling of that cladding to the window bays would provide the frontages of the Proposed Development with depth and articulation, to a much greater extent than the existing building. The greenery proposed for the roof terrace of Level 14 of Newcombe Tower would be evident from this location, providing a soft landscape element at the upper levels of the building.

6.84 The base of the Proposed Development could be seen to be animated in character, with high quality public realm and a new route through to Uxbridge Street visible to a small extent.

Magnitude of impact: high

Scale and nature of effect: major, beneficial



6.85 The cumulative scheme at Astley House would be visible to the east of the Proposed Development (left in this image), partly obscuring it, although not to the extent that the Proposed Development's magnitude of impact would be reduced. It would have a linear form and would be medium rise such that it would be consistent with the existing townscape character of the District Centre, in which the Proposed Development and Campden Hill Towers appear as the principal tall vertical elements, contrasting with lower scale and horizontally emphasised buildings.

Magnitude of impact: high

Scale and nature of effect: major, beneficial





- 6.86 This viewpoint is located on the northern side of Notting Hill Gate, approximately 30m to the north-east of the Site, and it offers a southerly view down Kensington Church Street.
- 6.87 This demonstrates the architectural and urban poverty of the existing buildings on the Site; all the built fabric dates to the post-war years, with Astley House to the left and the remodelled David Game House further right. Beyond Newcombe House to the south are the contemporaneous terraces of one and two storeys, and the five storey Royston Court. Newcombe House is set back from the corner and placed onto the lower forms without any visual transition. The townscape character is poor, particularly for such a key junction in the District Centre.
- 6.88 This view is of **low-medium** sensitivity.



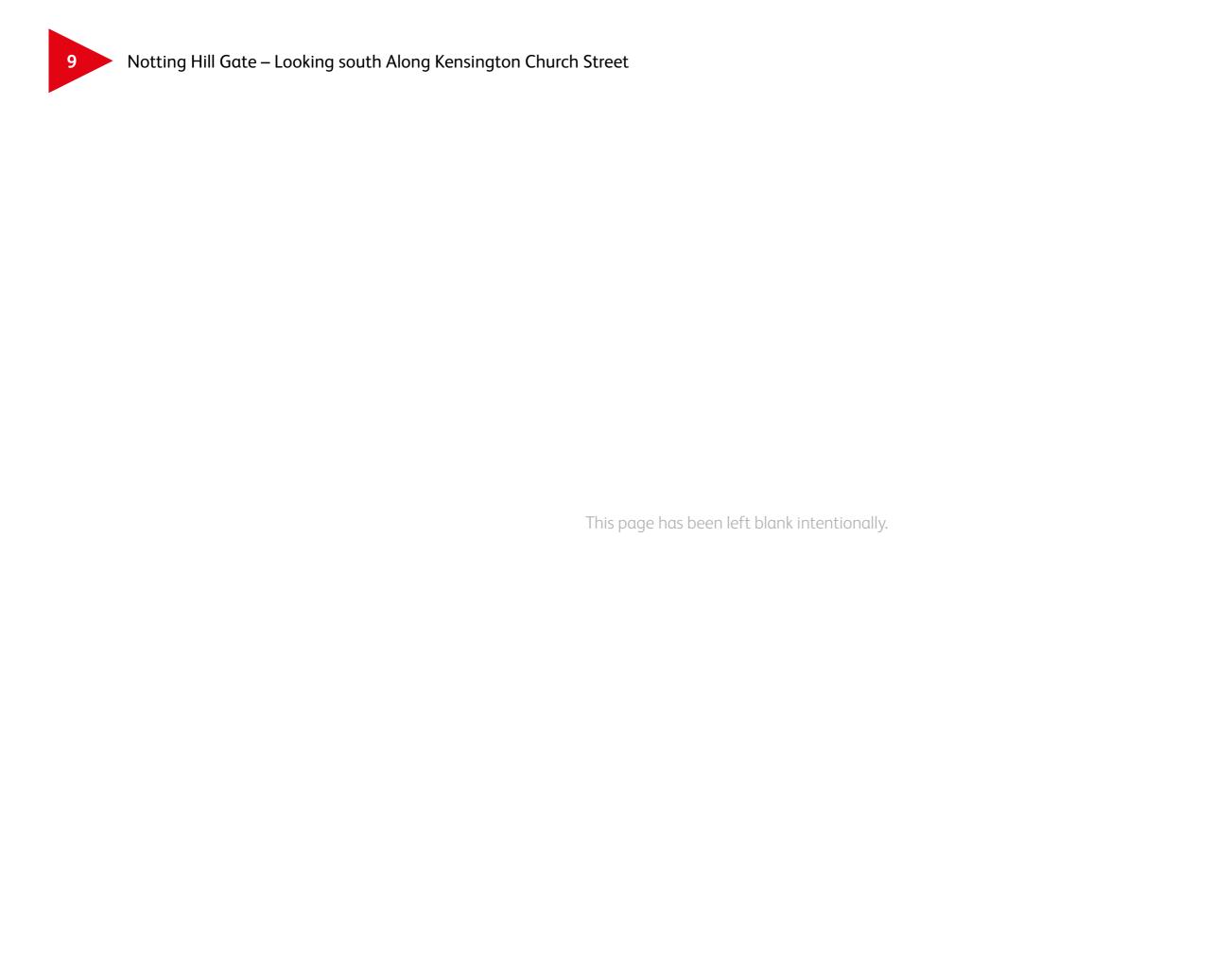
6.89 The Proposed Development would appear across the centre of the image, partly screened by trees at lower level. While it would have a noticeably greater apparent scale than the existing Newcombe House at this close range, its apparent height would be commensurate with its location on a corner site within the heart of the District Centre, and its verticality would provide a welcome contrast with the long horizontally emphasised frontages of Astley House and David Game House (extending beyond the borders of the image but readily visible to $\boldsymbol{\alpha}$ viewer in this location).

6.90 The Proposed Development would be of substantially higher quality than the existing building on the Site. The expression of the Newcombe Tower within the Proposed Development as being formed of three linear elements of different heights would provide it with a distinctive form and would contrast favourably with the undifferentiated massing of the existing tower on the Site. The architecture would have a clear sense of order, with window bays arranged in a regular manner horizontally, and arranged into progressively smaller groups vertically. The frontages of the Newcombe Tower would have a considerably greater sense of depth and articulation than those of the existing building. Its base could be seen to be animated in character, with high quality public realm.

6.91 The KCS Office Block within the Proposed Development would form an intermediary scale between the tower and the existing development to the south of the Site. Its brick frontages would have depth and articulation which would enliven the street scene compared to the drab existing building on the Site.

Magnitude of impact: high

Scale and nature of effect: major, beneficial

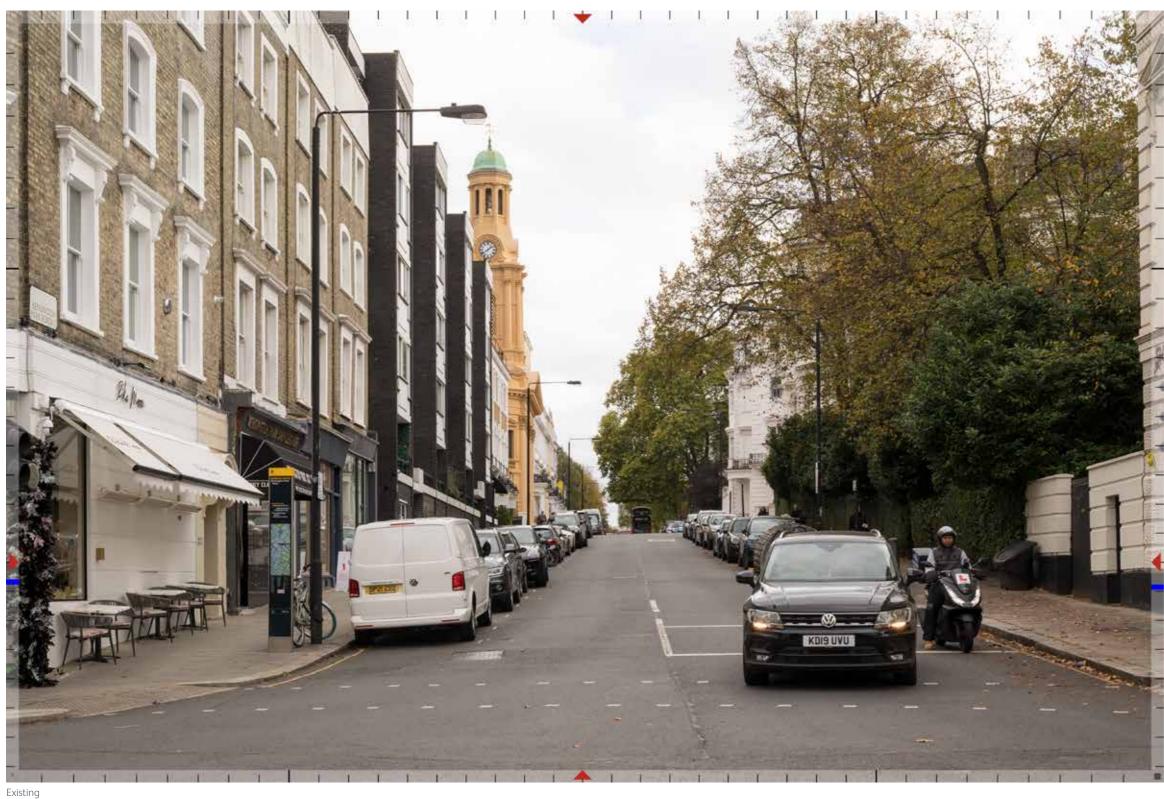




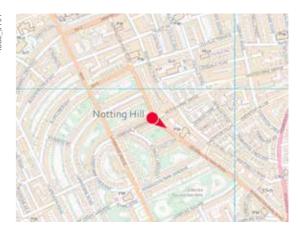
6.92 The corner of the cumulative scheme at Astley House would be visible to the east of the Proposed Development, left of it in this image. Together with the Proposed Development, Astley House would reinforce the existing character of the view as including medium and large scale post-war and modern buildings seen within a District Centre, main road condition.

Magnitude of impact: high

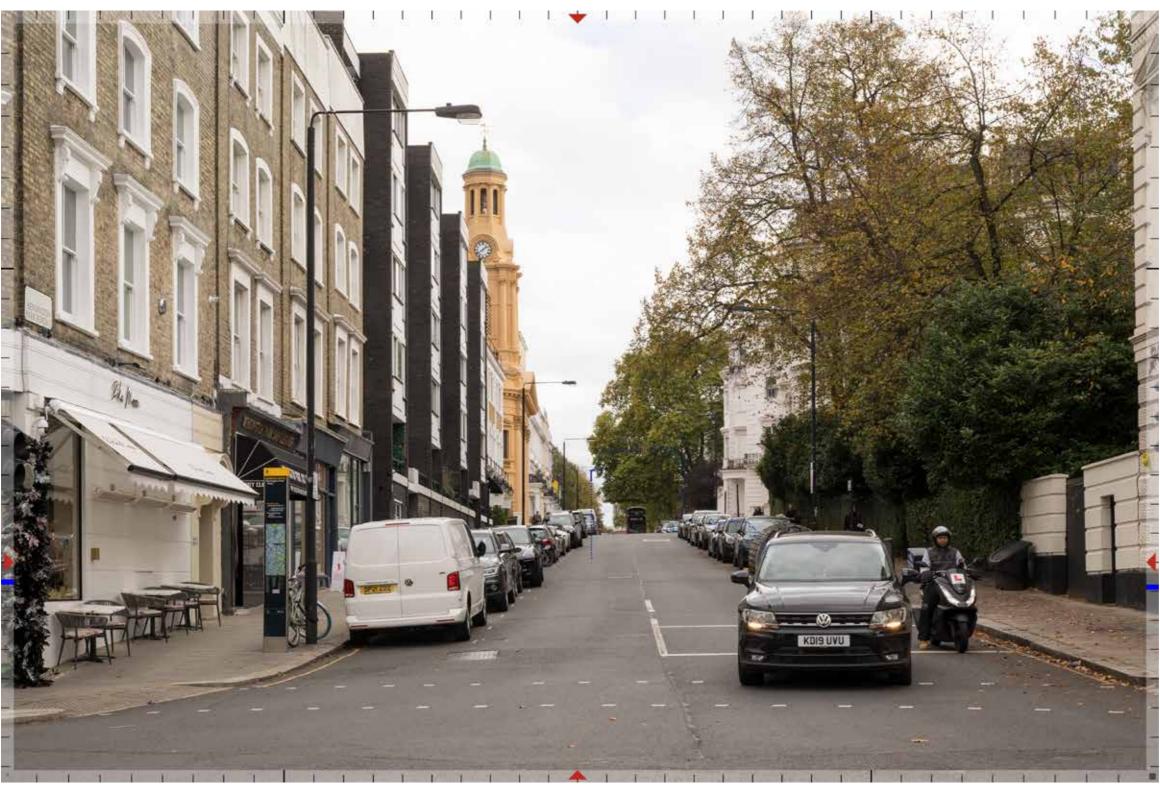
Scale and nature of effect: major, beneficial







- 6.93 This viewpoint is located on Westbourne Grove/ Ladbroke Gardens, and it offers a southeasterly view along Kensington Park Road in the Ladbroke Conservation Area. It is located approximately 750m north-west of the Site.
 - The view is framed by the early 19th century mixed use four storey buildings to the east (left), with the bell tower of the grade II* listed Church of St Peter forming a focal point in the near distance. To the west, the run of stucco finished listed residential blocks in Stanley Gardens and Kensington Park Gardens is interrupted by the landscaping in Ladbroke Gardens in the middle distance.
- 6.95 At the end of the vista is the concrete and glass north elevation of Newcombe House, largely screened by trees in this late autumn view (and entirely concealed in summer).
- 6.96 This is α view of **medium** sensitivity.



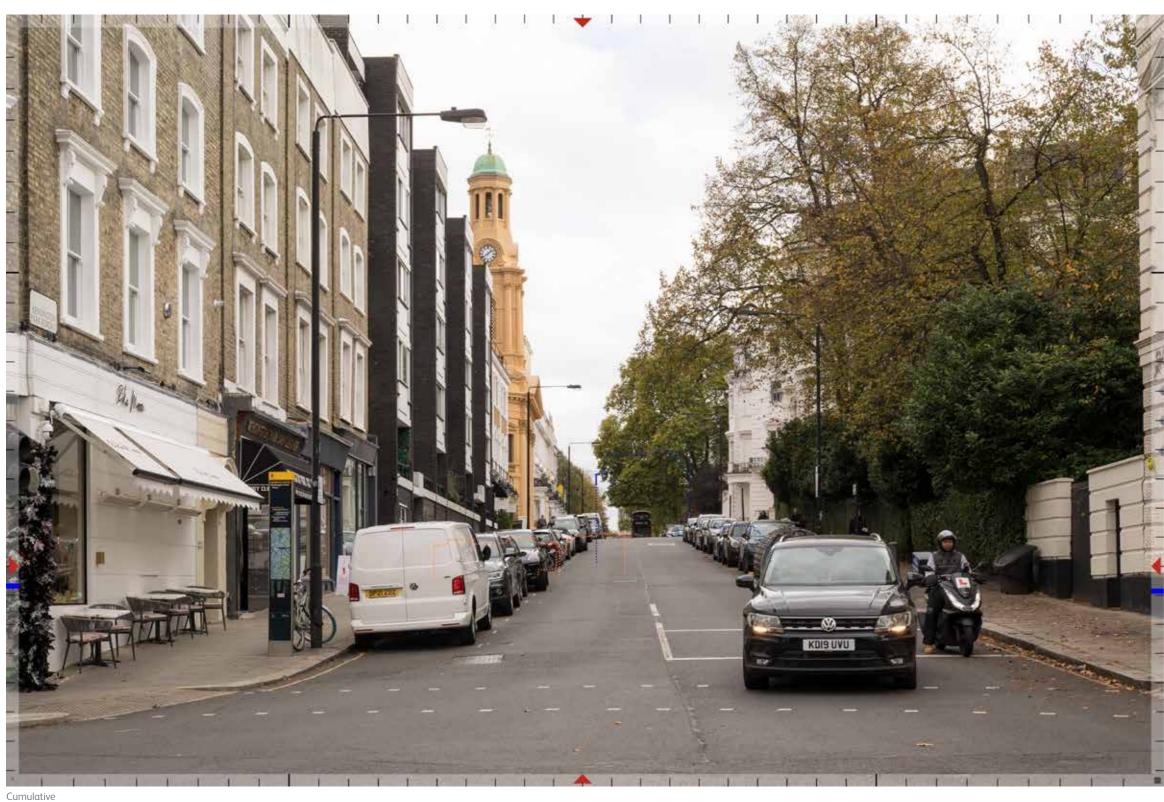
Proposed

The Newcombe Tower within the Proposed Development would appear in the middle distance. It would be largely concealed by tree foliage, and even in winter would be screened to a considerable extent by tree branches. The apparent height of the Newcombe Tower would be much lower than that of buildings in the foreground, and it would appear distinct and separate from the historic buildings of the Ladbroke Conservation Area in the foreground.

To the limited extent it would be seen, the proposed Newcombe Tower would appear as a building of high design quality, with a light colouration that would relate well to the stucco of foreground buildings.

Magnitude of impact: low (summer), lowmedium (winter)

Scale and nature of effect: minor (summer), minor-moderate (winter), neutral



There would be no cumulative schemes visible in this view, and the effect would be unchanged compared to that for the Proposed Development considered on its own.

Magnitude of impact: low (summer), lowmedium (winter)

Scale and nature of effect: minor (summer), minor-moderate (winter), neutral



- 6.100 This viewpoint is located on the northern side of Westbourne Grove, approximately 700m north of the Site, and offers a south-easterly long view along Denbigh Road in the Pembridge Conservation Area.
- 6.101 The road is lined by a dense avenue of mature trees. The buildings mostly screened in this summer photograph are brick and stucco faced, three/four storey mid-19th and mid-20th century shops and residential premises. Newcombe House terminates the street vista in the distance.
- 6.102 This is α view of **medium** sensitivity.



6.103 The upper part of the Newcombe Tower within the Proposed Development would appear in the middle distance, partly concealed by tree foliage (although not to the extent that the magnitude of impact in winter would be different to that in summer). The apparent height of the Newcombe Tower would be much lower than that of the historic buildings within the Pembroke Conservation Area in the foreground of the view, and it would appear distinct and separate from them.

6.104 The proposed Newcombe Tower would appear as a high quality focal point at the end of this street vista. The expression of Newcombe Tower as comprising three linear elements of different heights would provide it with a distinctive form. The architecture would have a clear sense of order which could be appreciated to some limited extent at this distance, with window bays arranged in a regular manner, and depth and articulation provided by the cladding with its elliptical profile.

Magnitude of impact: low-medium

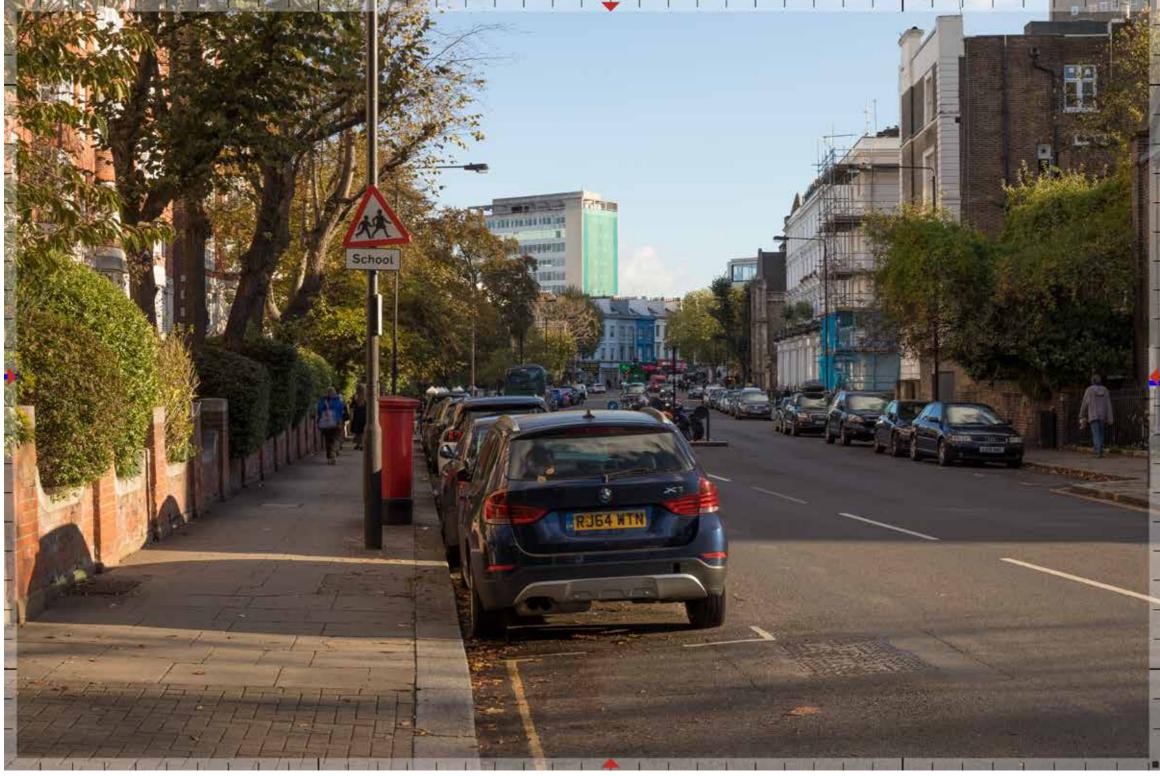
Scale and nature of effect: minor-moderate, beneficial



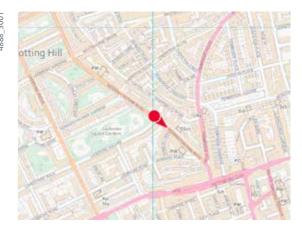
Cumulative

6.105 There would be no cumulative schemes visible in this view, and the effect would be unchanged compared to that for the Proposed Development considered on its own.

Magnitude of impact: low-medium



Existing



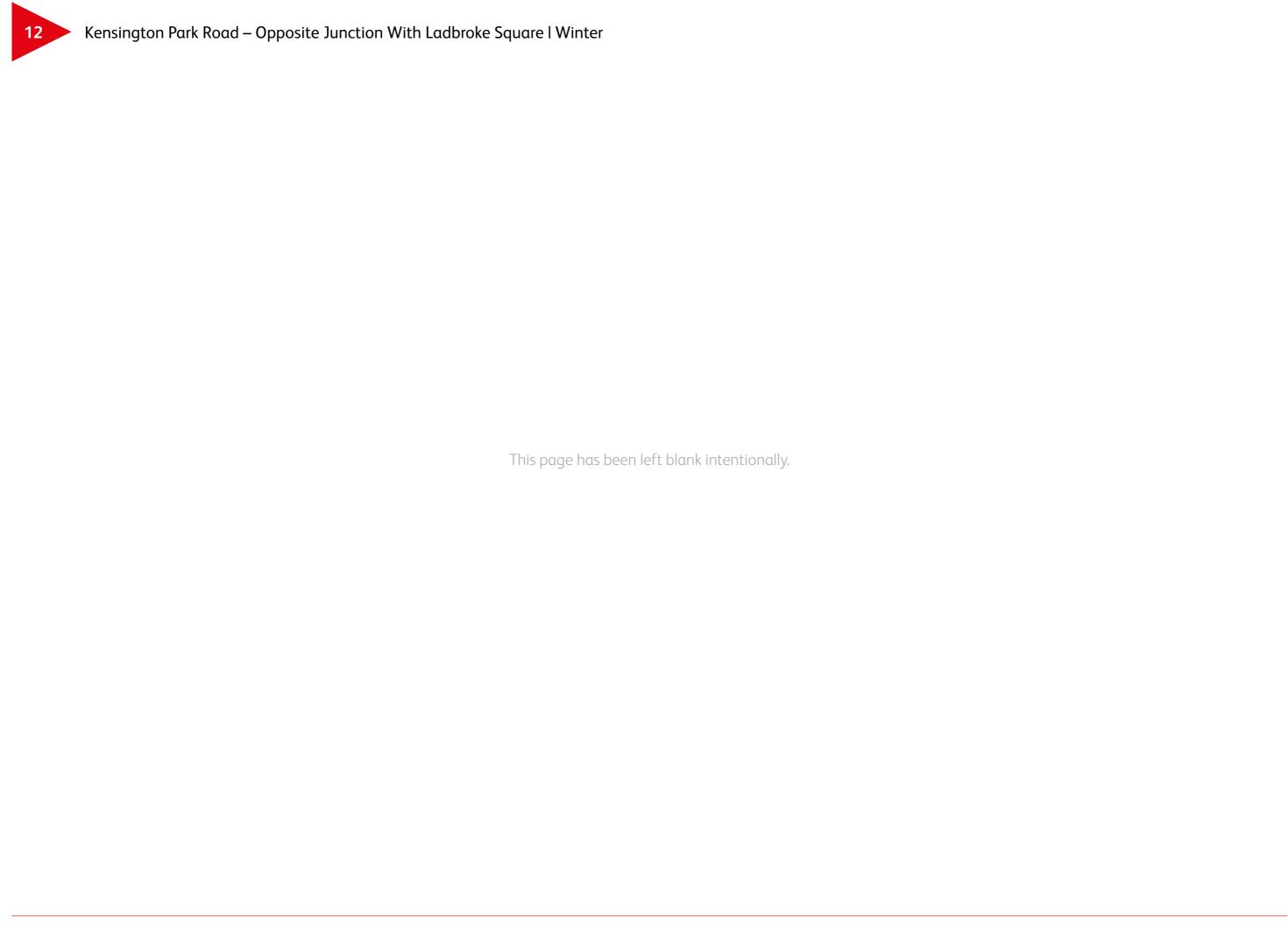
- 6.106 This viewpoint is located on the eastern side of Kensington Park Road, opposite the junction with Ladbroke Square, and it is looking in a south-easterly direction through the Ladbroke Conservation Area. It is located approximately 200m north-west of the Site.
- 6.107 The street includes a diverse mixture of historic building types, with some large pre-WWII mansion block developments to the east (left), ground plus five storeys tall, and with lower height and earlier residential terraces of ground plus three storeys to the west. Trees are a significant feature along the eastern pavement, particularly in summer.
- 6.108 The curving road cuts across to the right and obscures the base of Newcombe House on the skyline beyond. Further west, the top of Campden Hill Tower is visible, at the top right corner of the image (and more would be visible to a viewer in this location): together they landmark the core of the Notting Hill Gate District Centre. Just visible on the right is the listed Kensington Temple, and in the distance the listed cabmen's shelter stands in the middle of the road.
- 6.109 This is a view of **medium** sensitivity.

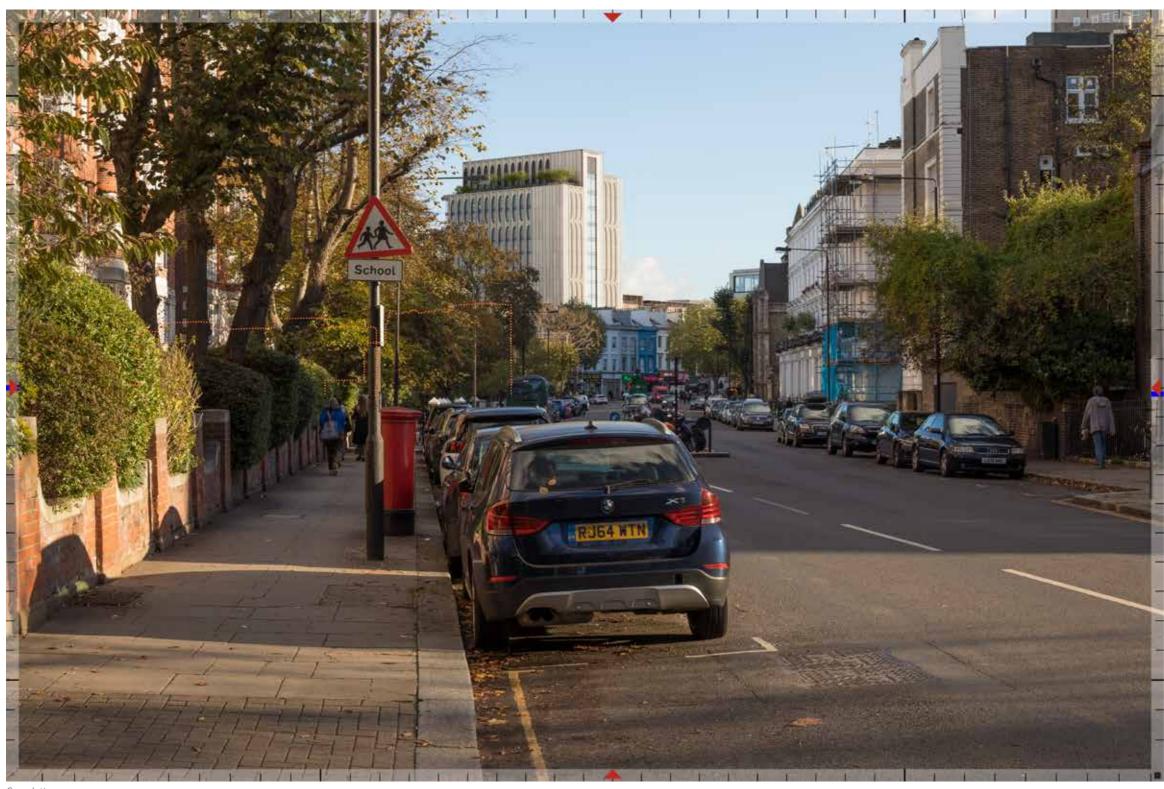


Proposed

- 6.110 The new Newcombe Tower and a small part of the top of the KCS Office Block within the Proposed Development would appear towards the centre of the image. While Newcombe Tower would have a noticeably greater apparent scale than the existing Newcombe House, its apparent height would be considerably less than that of Campden Hill Tower and other buildings closer to the viewpoint, and would sit comfortably within the overall view.
- 6.111 The Proposed Development would be of substantially higher quality than the existing building on the Site. The expression of Newcombe Tower as being formed of three linear elements of different heights would provide it with a distinctive form and interesting profile on the skyline and it would contrast favourably with the undifferentiated massing of the existing tower on the Site. The greenery proposed for the roof terrace of Level 14 of Newcombe Tower would be evident from this location, providing a soft landscape element at the upper levels of the building.
- 6.112 The architecture of Newcombe Tower would have a clear sense of order, with bays arranged in a regular manner horizontally, and with windows arranged into progressively smaller groups vertically. The frontages of the Proposed Development would have a considerably greater sense of depth and articulation than those of the existing building.
- 6.113 The top of the Kensington Church Street building would be visible to a small extent, providing a pleasingly articulated roofline at lower level in the background of the view.

Magnitude of impact: medium

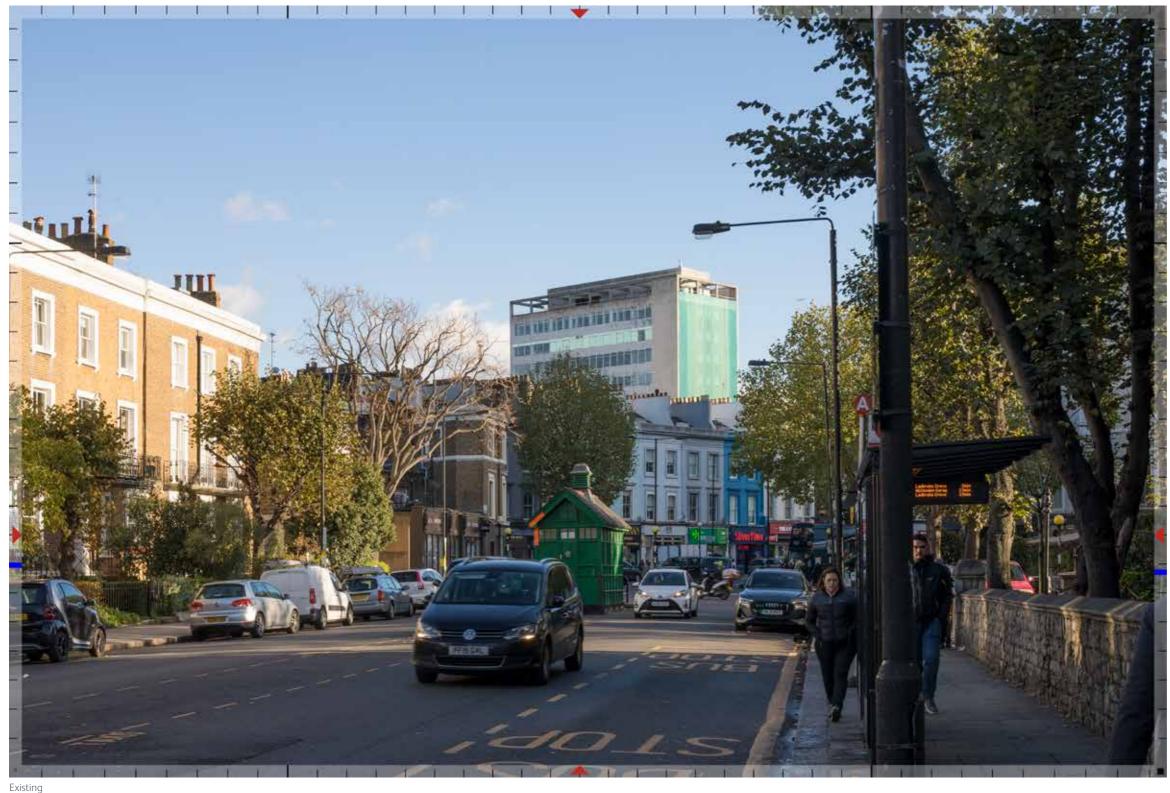




Cumulative

6.114 There would be no cumulative schemes visible in this view, and the effect would be unchanged compared to that for the Proposed Development considered on its own.

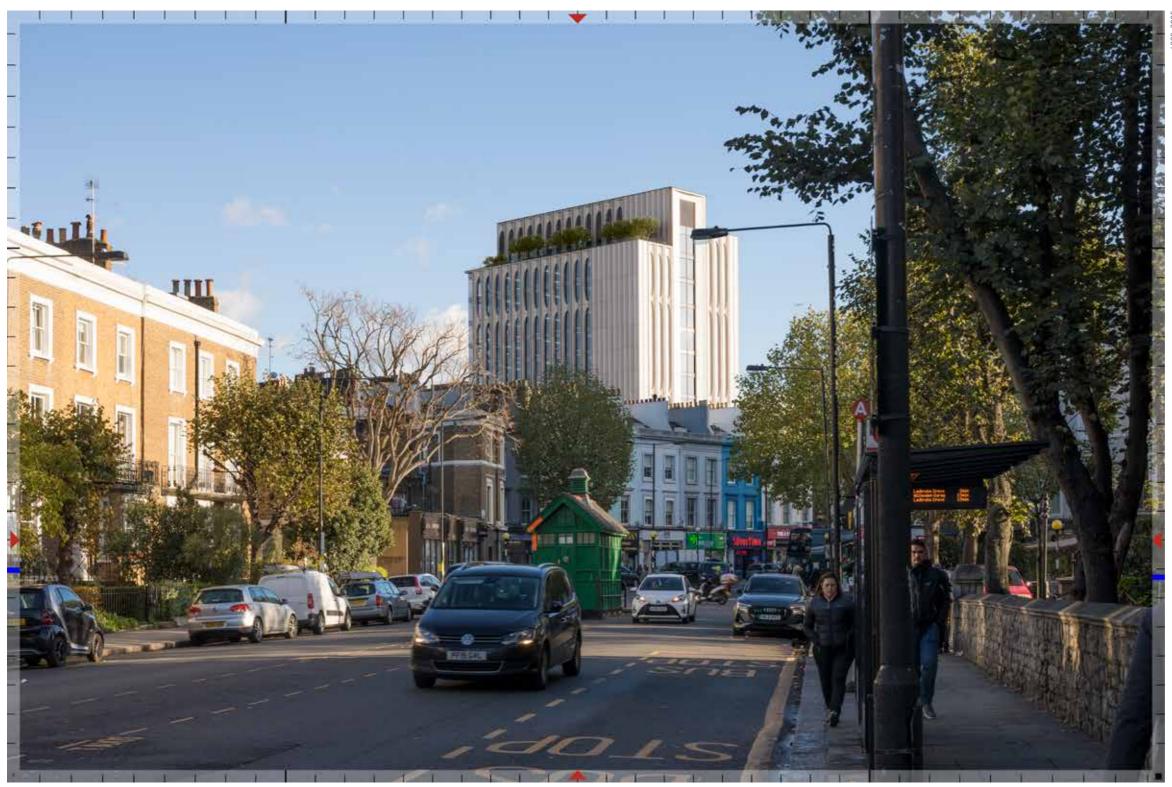
Magnitude of impact: medium







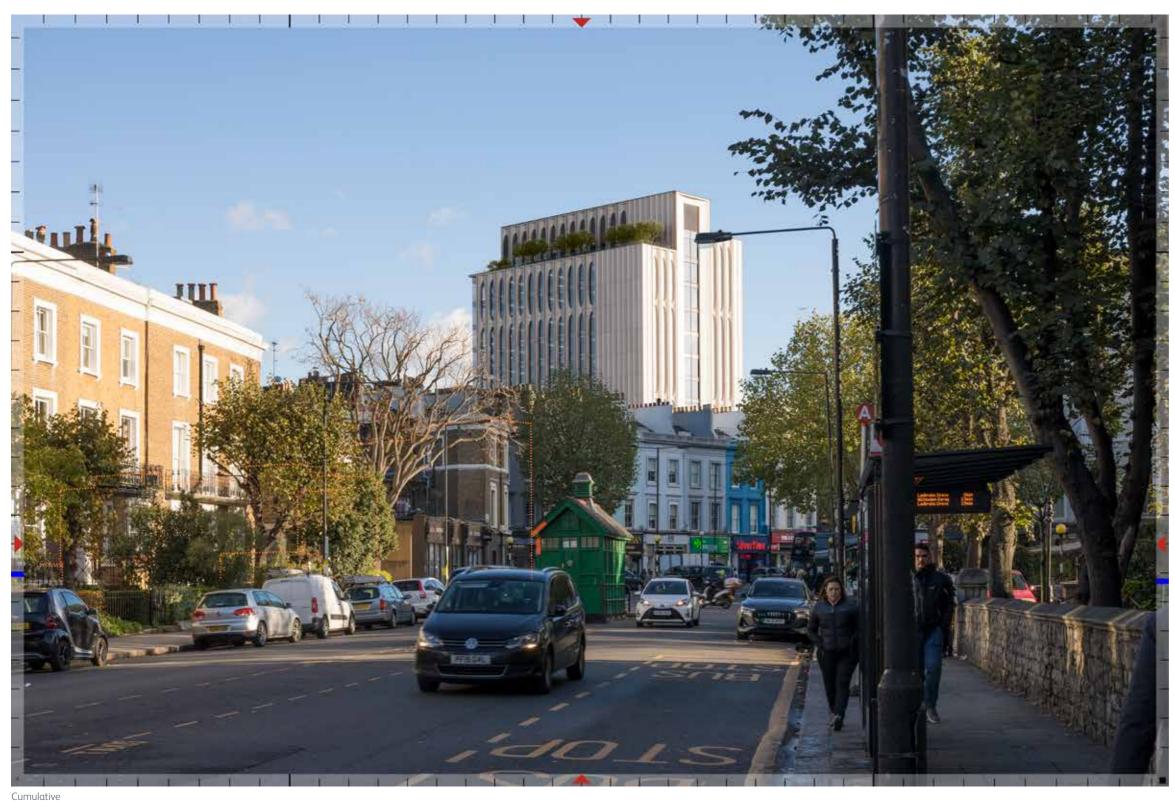
- 6.115 This viewpoint is located on the western side of Kensington Park Road, approximately 200m north-west of the Site, and the view is looking in a south-easterly direction. It is located within the Ladbroke Conservation Area and is located further south of the previous view and taken on the other side of Kensington Park Road, immediately adjacent to the listed Kensington Temple.
- 6.116 The listed cabmen's hut in the middle of the road is clearly visible from this point. The eastern side of the road is formed of three storey terraced houses of the early 19th century, faced in brick with stucco dressings, and further south are stucco rendered mixeduse shop/residential buildings of a similar age and scale, which turn the corner enclosing the street level view. The curving road cuts across to the right and obscures the base of Newcombe House on the skyline beyond.
- 6.117 The visible part of the existing Newcombe House tower lies in the middle distance. It appears as a distinct townscape element, separate from the 19th century development in the foreground, and marking the Notting Hill Gate District Centre. It is drab in appearance, however, and detracts from the overall quality of the view.
- 6.118 This is a view of **low-medium** sensitivity.



Proposed

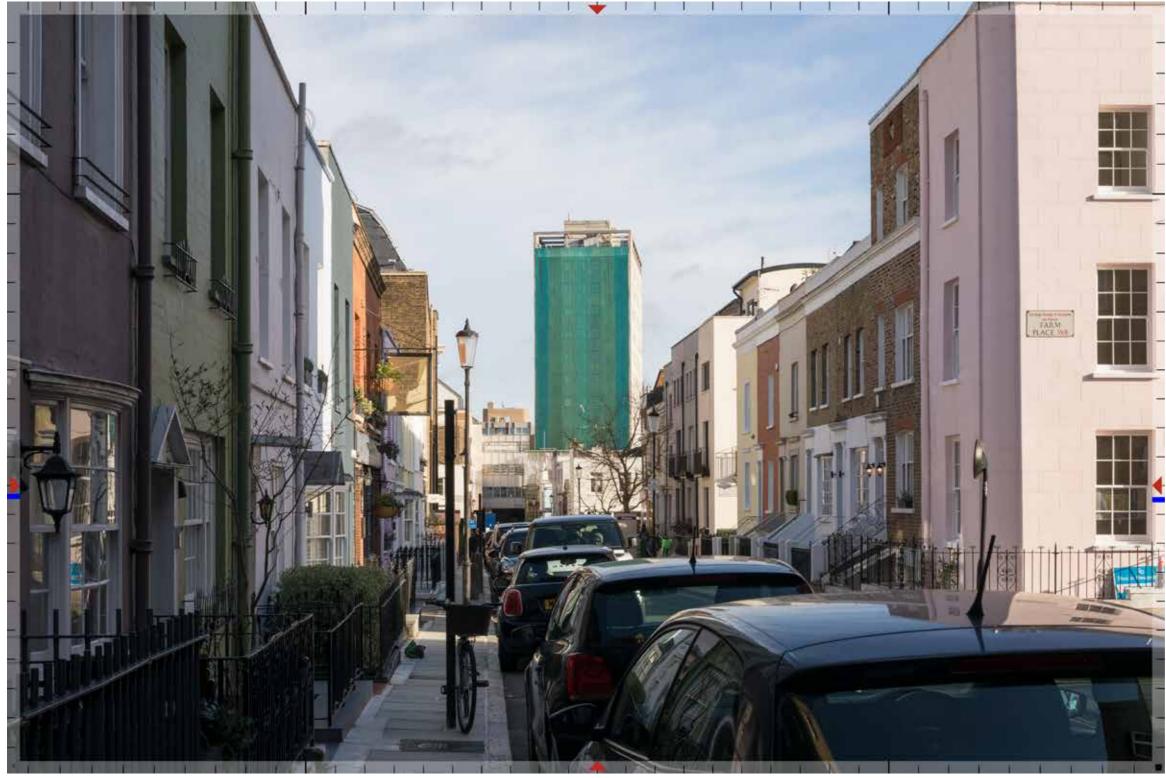
- 119 Newcombe Tower within the Proposed Development would appear in the centre of the image. While it would have a noticeably greater apparent scale than the existing Newcombe House, this would be a matter of degree rather than wholly new, and it would sit comfortably within the overall view.
- 6.120 The Proposed Development would be of substantially higher quality than the existing building on the Site. The expression of Newcombe Tower as being formed of three linear elements of different heights would provide it with a distinctive form and interesting profile on the skyline and it would contrast favourably with the undifferentiated massing of the existing tower on the Site. The greenery proposed for the roof terrace of Level 14 of Newcombe Tower would be evident from this location, providing a soft landscape element at the upper levels of the building.
- 6.121 The architecture of Newcombe Tower would have a clear sense of order, with bays arranged in a regular manner horizontally, and with windows arranged into progressively smaller groups vertically. The frontages of the Proposed Development would have a considerably greater sense of depth and articulation than those of the existing building.
- 6.122 Overall, the Newcombe Tower would appear as a high quality focal point in the view, and a landmark for the District Centre in the middle distance.

Magnitude of impact: medium-high



6.123 There would be no cumulative schemes visible in this view, and the effect would be unchanged compared to that for the Proposed Development considered on its own.

Magnitude of impact: medium-high



Existing



- 6.124 This viewpoint is located on the northern side of Uxbridge Street near the junction with Farm Place and the view is looking east in the direction of the Site. The view is looking through the Northern Corridor sub-area of the Kensington Conservation Area. The viewpoint is located approximately 230m from west of the Site.
- 6.125 Uxbridge Street is lined with two storey cottages of the late 18th/early 19th century with a mixture of later 19th and early 20th century buildings of a larger scale, including the stock brick rear of the listed Coronet and Gate Cinemas to the north (on the left).
- 6.126 The west elevation of Newcombe House is visible at the end of the street on the right. Uxbridge Street currently terminates in the vehicular undercroft of Newcombe House. Both are drab in appearance and detract from the overall quality of the view.
- 6.127 As the Kensington CAA 2017 (Ref. 1-19) notes: "Due to the grid-like character of much of the street layout, there are numerous short views and vistas in the conservation area. Many streets terminate with a vista to houses in the next street often enhanced by street trees or garden planting. Such views give the area a coherent inward-looking character [...]" (para 4.22). It goes on to state that "...Newcombe House and Campden Hill Tower appear as a backdrop in views, projecting above the historic roofscapes and small scale historic terraces, particularly in the north of the conservation area" (para 4.24).
- 6.128 This is α view of **medium** sensitivity.



Proposed

6.129 The Proposed Development would appear towards the centre of the image. While its apparent height would be noticeably greater than the existing Newcombe House, it would be lower than that of buildings in the foreground, and would sit comfortably within the view overall.

6.130 The Proposed Development would present its shorter western frontage in this view, allowing it to form a pleasingly vertical contrast with the lower scale development in the foreground in this view. It would be read as distinct and separate from that development, signalling the location of the District Centre beyond. At ground level, the new route through from Uxbridge Street to Notting Hill Gate, which would significantly enhance permeability in the local area, would be visible.

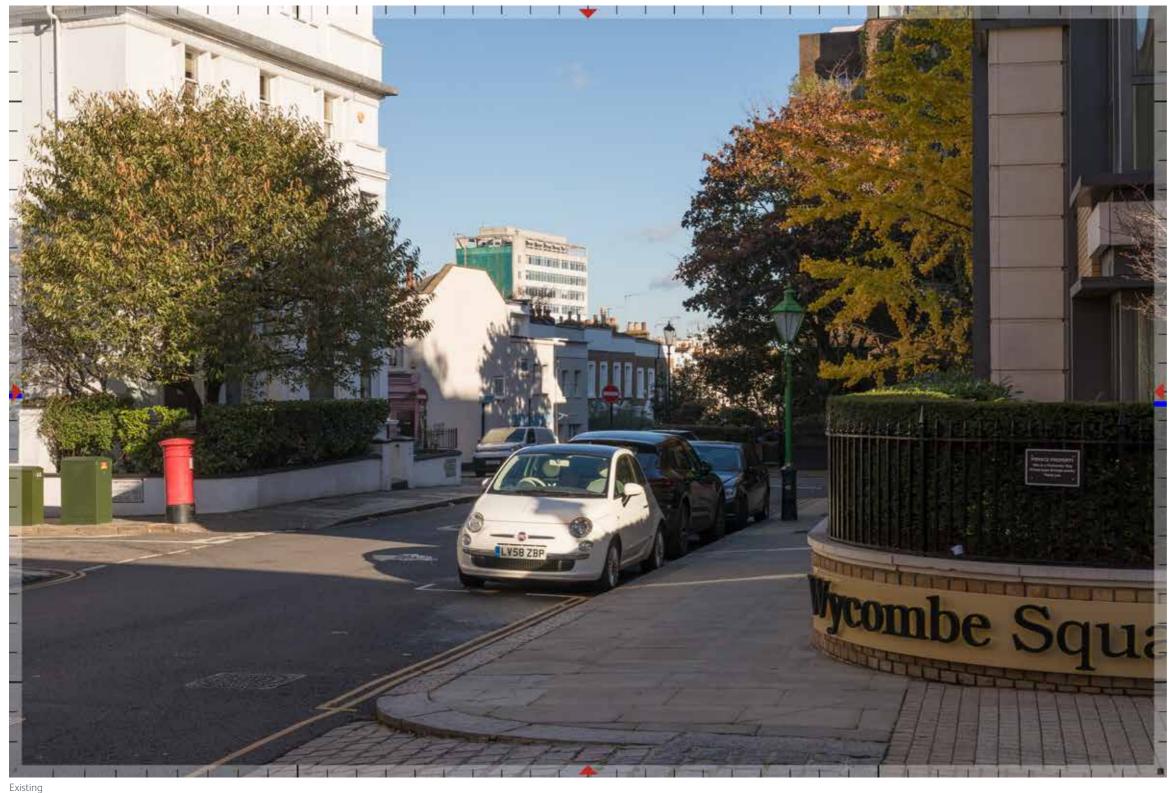
6.131 The Proposed Development would be of substantially higher quality than the existing building on the Site. The expression of the Proposed Development as being formed of three linear elements of different heights would provide it with a distinctive form and would contrast favourably with the undifferentiated massing of the existing tower on the Site. The architecture would have a clear sense of order, with window bays arranged in a regular manner horizontally, and arranged into progressively smaller groups vertically. The frontages of the Proposed Development would have a considerably greater sense of depth and articulation than those of the existing building.

Magnitude of impact: high



6.132 The cumulative schemes would not be visible in this view, other than a minimal part of Astley House which would be virtually indiscernible. The cumulative effect would be unchanged compared to that for the Proposed Development considered on its own.

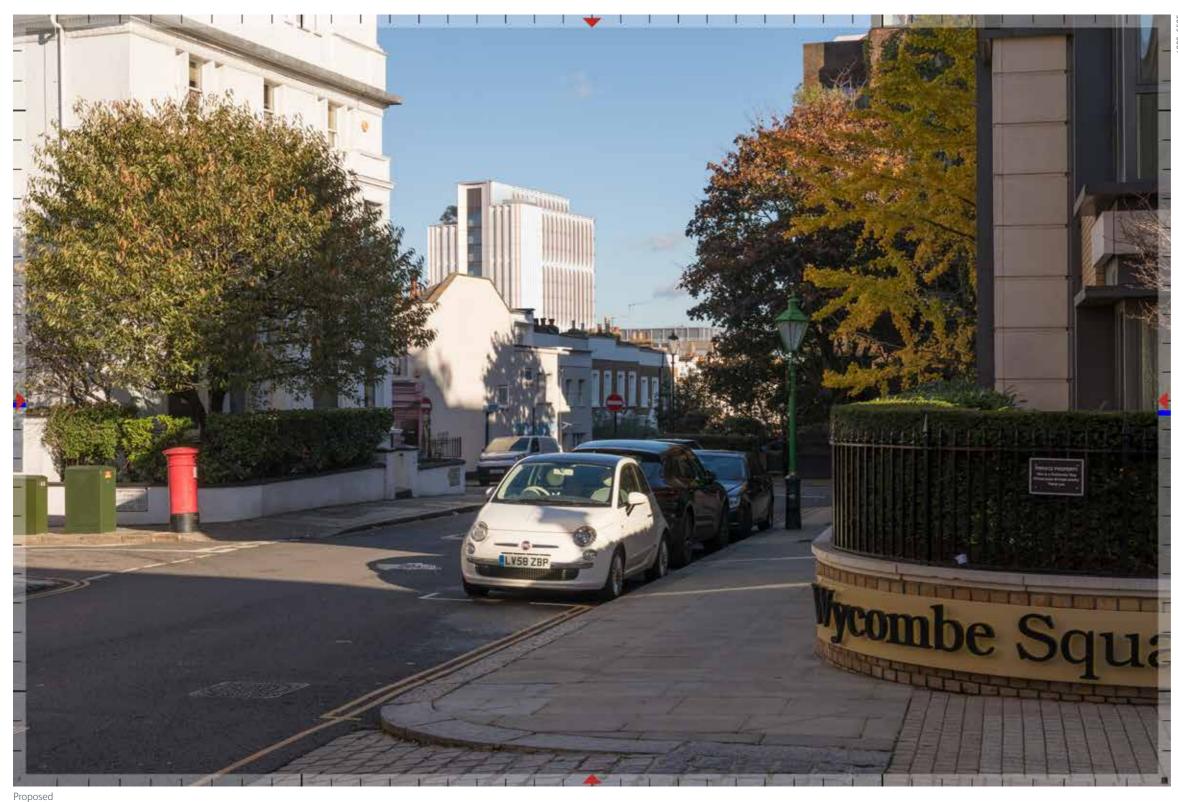
Magnitude of impact: high







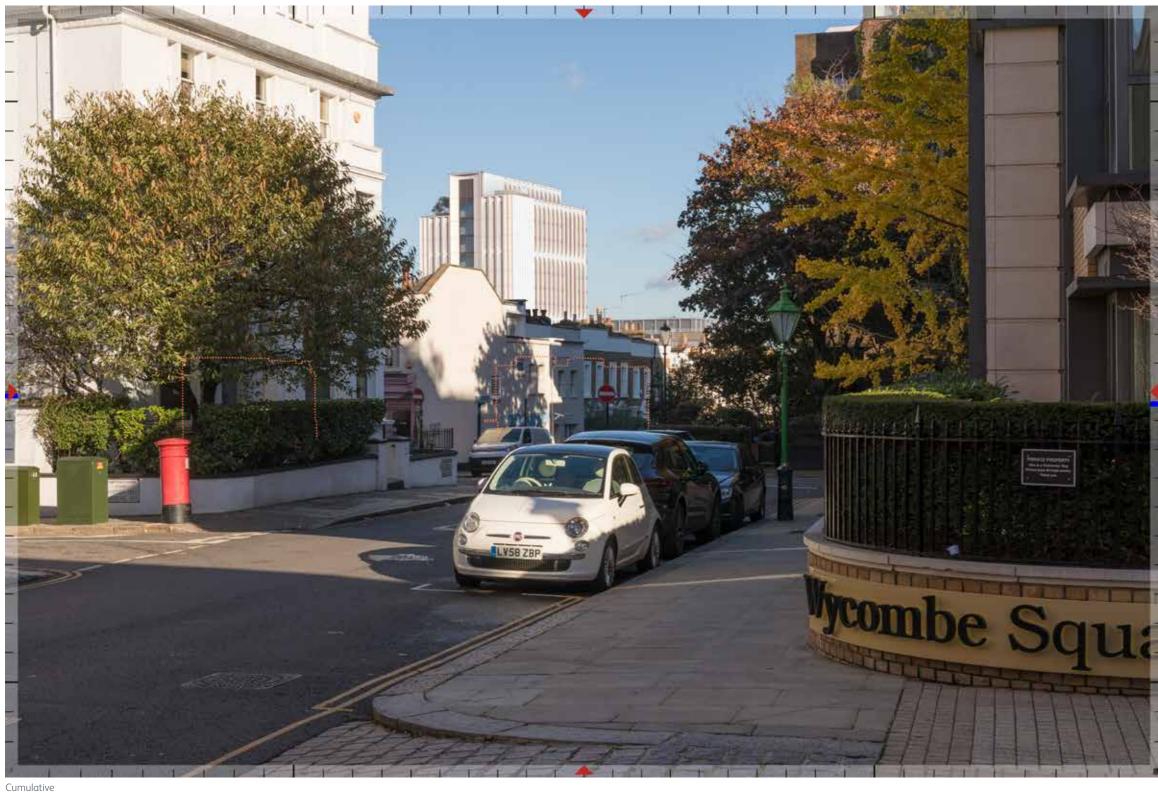
- 6.133 This viewpoint is located on the southern side of Aubrey Walk, at the entrance to Wycombe Square, and the view is looking north-east. It is located approximately 300m south-west of the Site and is in the Kensington Conservation Area.
- 6.134 Wycombe Square is a modern residential development, part of which is visible at the right edge of the image. A post-war apartment block on Campden Hill Road appears beyond it, screened by trees. In general, there is a very mixed range of architectural styles at the junction with Campden Hill Tower ahead. Brick and stucco housing is prevalent on the northern side of Aubrey Walk and, moving east, Kensington Place.
- 6.135 Newcombe House is visible in the distance rising above the residential terraces of Kensington Place. It appears distinct and separate from them, forming a marker for the Notting Hill Gate District Centre. Its drab appearance detracts from the overall quality of the view.
- 6.136 This is a view of **medium** sensitivity.



6.137 Newcombe Tower and a small part of the KCS Office Block within the Proposed Development would appear in the middle distance. While the apparent height of the Newcombe Tower would be noticeably greater than that of the existing Newcombe House, it would be considerably lower than that of the buildings closest to the viewpoint, and would sit comfortably within the view overall. The small part visible of the KCS Office Block would have little visual impact.

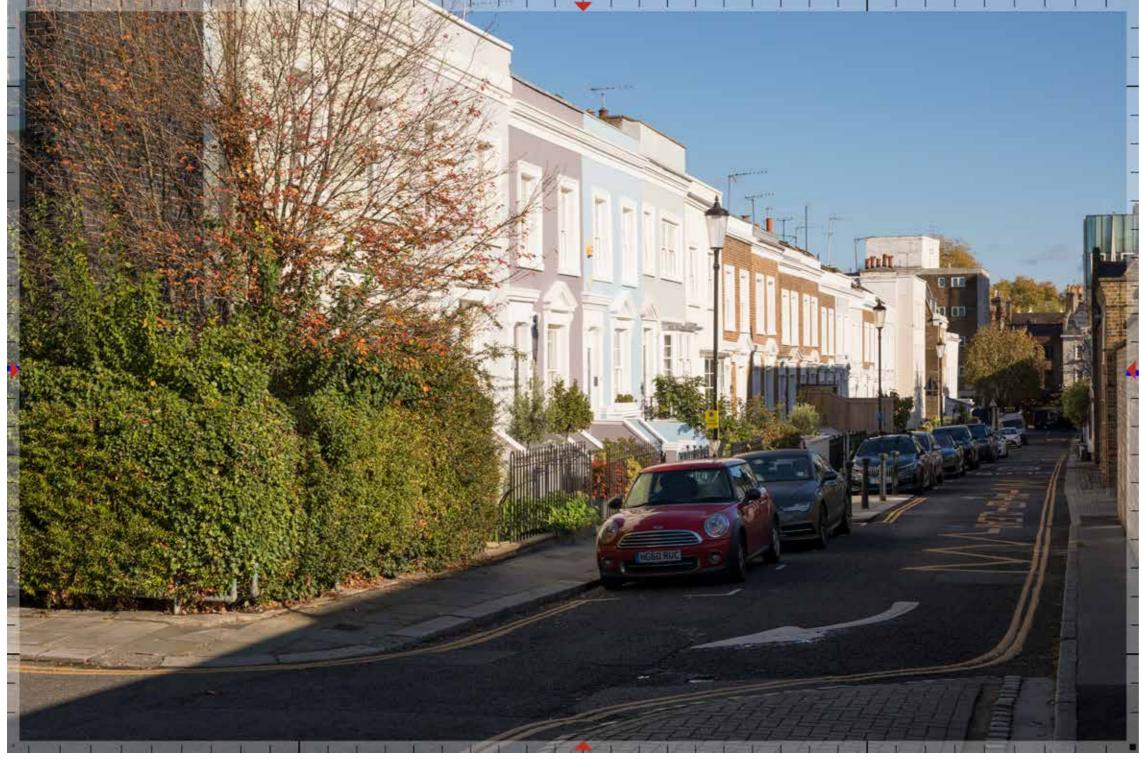
6.138 The Proposed Development would be of substantially higher quality than the existing building on the Site. The expression of the new Newcombe Tower as being formed of three linear elements of different heights would provide it with a distinctive form and would contrast favourably with the undifferentiated massing of the existing tower on the Site. The architecture would have a clear sense of order, with bays arranged in a regular manner horizontally, and with windows arranged into progressively smaller groups vertically. The frontages of the Proposed Development would have a considerably greater sense of depth and articulation than those of the existing building as a result of the cladding framing the bays.

Magnitude of impact: medium



6.139 There would be no cumulative schemes visible in this view, and the effect would be unchanged compared to that for the Proposed Development considered on its own.

Magnitude of impact: medium



Existing



- 6.140 This viewpoint is located on the southern side of Kensington Place and is looking east in the direction of the southern end of the Site. It is located approximately 150m west of the Site.
- 6.141 This view is from the Hillgate Village sub-area of the Kensington Conservation Area and takes in the Classical 19th century terrace of Kensington Place terminated by the Tom Kay Architect's 1960s grade II listed sculptural brickwork modernist house at 23 Kensington Place, with its turreted staircase return onto Hillgate Street (extreme left edge of this image). The whole building would be visible to a viewer in this location and it demonstrates how high quality, but very different architecture – in this case inspired by 1920s Dutch Expressionist precedents – can add qualitatively to the setting of existing historic buildings.
- 6.142 On the opposite side of the road and further down is the late Victorian St George's Hall.
- 6.143 Royston Court, the apartment block at the southern end of the Site, appears at the end of the road, its circulation core overrun and bland western façade adding nothing positive to the
- 6.144 This is α view of **medium** sensitivity.



Proposed

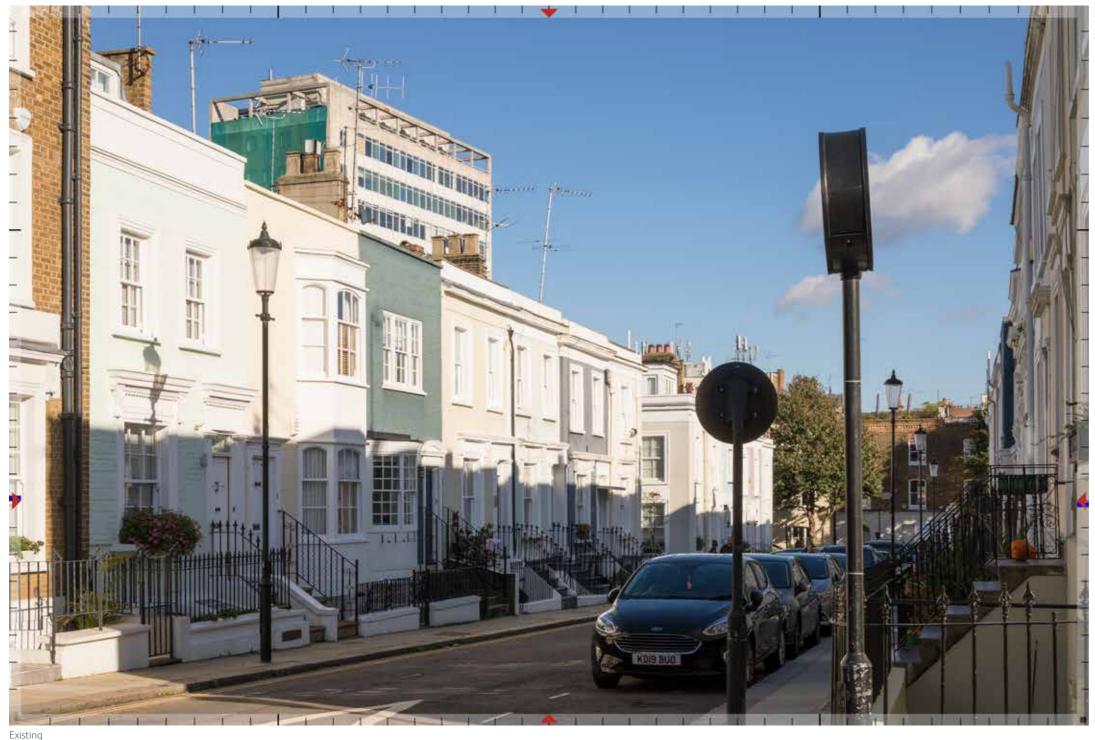
- 6.145 The Medical/ Affordable block within the Proposed Development would appear in the near to middle distance, on the right side of the image. While it would have a greater apparent scale than Royston Court, its scale would sit comfortably within the view, with its apparent height lower than foreground buildings. A small part of the KCS Office Block would be visible, but with little visual impact.
- 6.146 The Medical/ Affordable block would be of much higher visual and architectural quality than the existing Royston Court. Its use of brick and concrete would relate well to the materiality of existing buildings in the view and the deep angled reveals would provide visually interesting articulation to the frontages. The overall effect would be for it to appear as $\boldsymbol{\alpha}$ modern interpretation of the apartment blocks which are common in the local area.

Magnitude of impact: medium



6.147 There would be no cumulative schemes visible in this view, and the effect would be unchanged compared to that for the Proposed Development considered on its own.

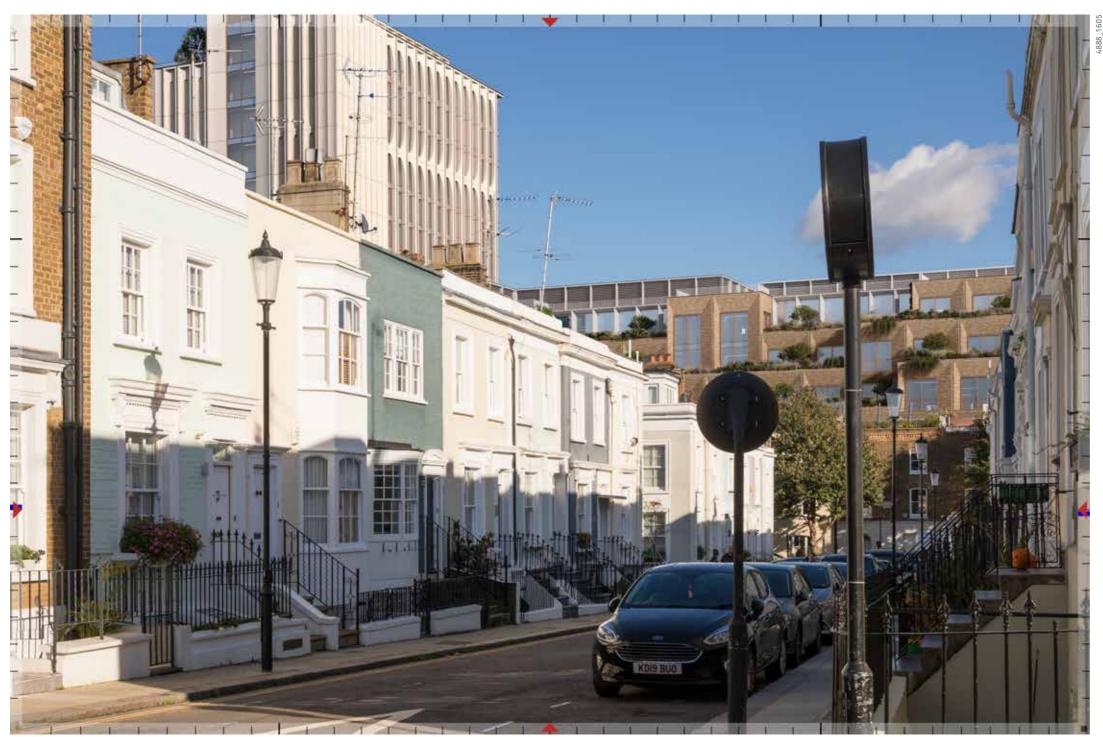
Magnitude of impact: medium







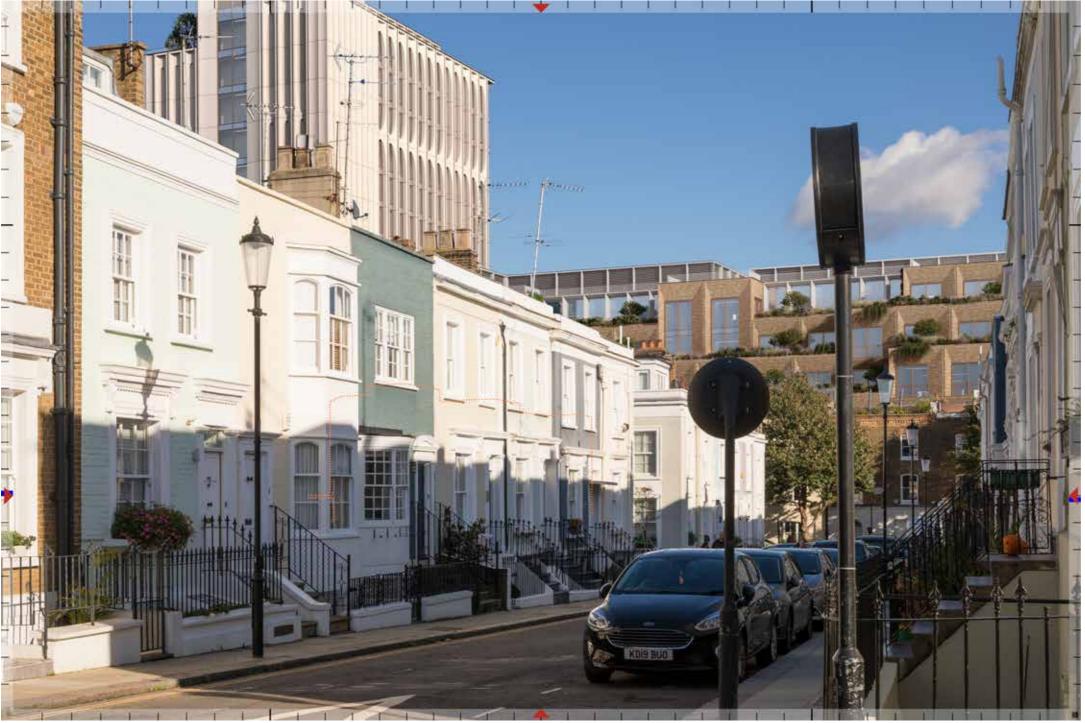
- 6.148 This viewpoint is located on the southern side of Hillgate Place, at the junction with Hillgate Street, and the view is looking north-east in the direction of the Site. It is located approximately 125m west of the Site. The viewpoint is located in the Hillgate Village sub-area of the Kensington Conservation Area and the view focuses on mid-19th century terraces of two and three storeys, mainly stucco rendered but with stock brick examples too. There is a strong orthogonal street plan which is highly legible.
- 6.149 Newcombe House is visible rising beyond the terrace ahead, and out of shot to the left the southern elevation of Campden Hill Tower terminates the street vista to the north. Newcombe House appears as a separate and distinct townscape element, marking the Notting Hill Gate District Centre. It is of a drab appearance which detracts from the overall quality of the view.
- 6.150 This is a view of **medium** sensitivity.



Proposed

- 6.151 The Proposed Development would appear across much of the backdrop of the image. While the new Newcombe Tower's apparent height would be noticeably greater than that of the existing Newcombe House, it would be lower than that of the buildings closest to the viewpoint, and would sit comfortably within the view overall.
- 6.152 The Proposed Development would be of substantially higher quality than the existing building on the Site. The expression of the new Newcombe Tower as being formed of three linear elements of different heights would provide it with a distinctive form and would contrast favourably with the undifferentiated massing of the existing tower on the Site. The architecture would have a clear sense of order, with bays arranged in a regular manner horizontally, and with windows arranged into progressively smaller groups vertically. The frontages of the Proposed Development would have a considerably greater sense of depth and articulation than those of the existing building as a result of the elliptical cladding framing the window bays. The light colouration of the Newcombe Tower would relate well to the stucco fronted buildings in the foreground.
- 6.153 The KCS Office Block, to the south of Newcombe Tower (right of it in this image), would have $\boldsymbol{\alpha}$ stepped form to the west which would be apparent in this view, helping to break up its overall scale and provide its form with visual interest. The brick facades would relate well to the materiality of existing buildings in the view, and the depth and articulation resulting from the angled window reveals would provide the frontage with visual interest.

Magnitude of impact: high



Cumulative

6.154 There would be no cumulative schemes visible in this view, and the effect would be unchanged compared to that for the Proposed Development considered on its own.

Magnitude of impact: high





- 6.155 This viewpoint is located on the southern side of Kensington Place, slightly further east along Kensington Place from View 17, in the Kensington Conservation Area. It is located approximately 90m south-west of the Site.
- 6.156 The street is narrow and the view channelled eastwards along it. Newcombe House is not visible.
- 6.157 The late Victorian St George's Hall appears obliquely on the southern side of the road. Royston Court, the apartment block at the southern end of the Site, appears at the end of the road, its circulation core overrun and bland western façade adding nothing positive to the view.
- 6.158 This is α view of **medium** sensitivity.



Proposed

6.159 The Medical/ Affordable Block would be visible on the right side of the image, with a small part of the KCS Office Block seen to its north (left in this image), the latter having little visual impact.

6.160 While its apparent height would be greater than that of the existing Royston Court, the Medical/ Affordable Block would appear lower than buildings in the foreground and its scale would sit comfortably within the view overall.

6.161 The architectural approach to the Medical/ Affordable Block, with its use of red brick and concrete, would relate well to the red brick and stone of historic buildings in the local area. The Medical/ Affordable Block would have the character of a modern interpretation of the 19th and early 20th century apartment blocks in the local area. The angling of the reveals in the Medical/ Affordable Block would provide its frontages with depth and articulation, and variety from floor to floor.

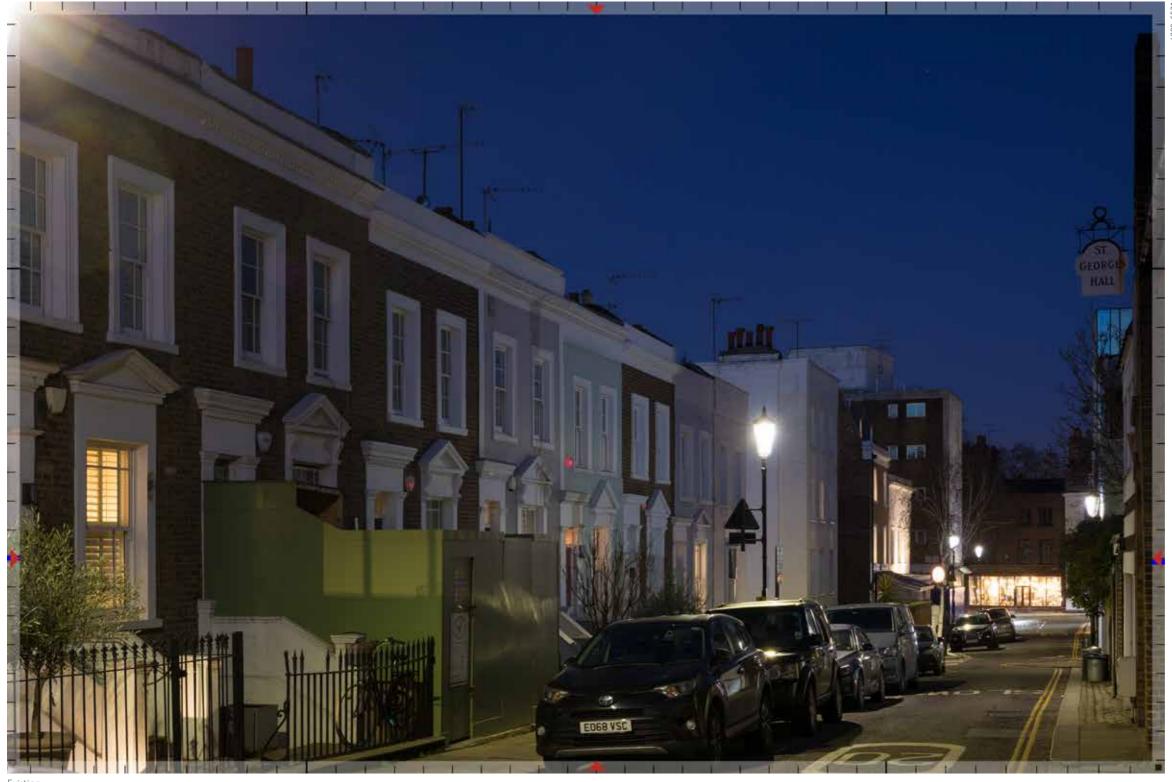
Magnitude of impact: medium



Cumulative

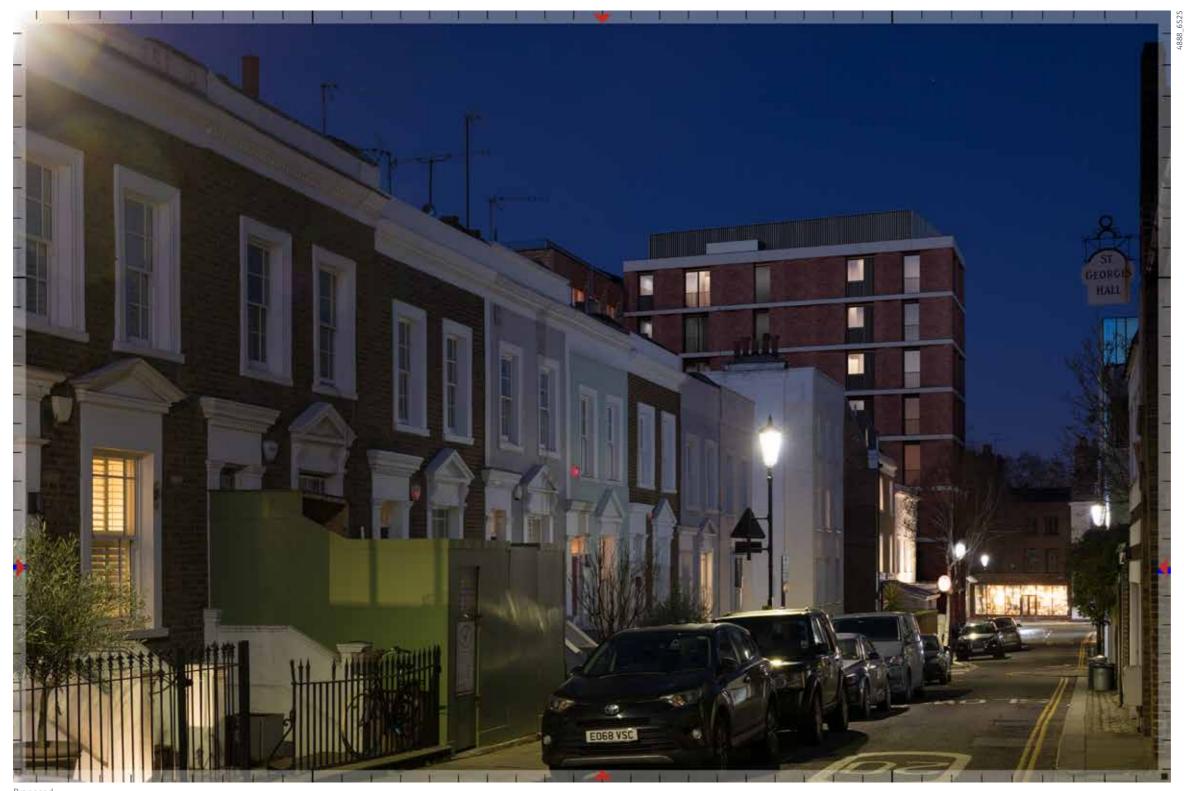
6.162 There would be no cumulative schemes visible in this view, and the effect would be unchanged compared to that for the Proposed Development considered on its own.

Magnitude of impact: medium





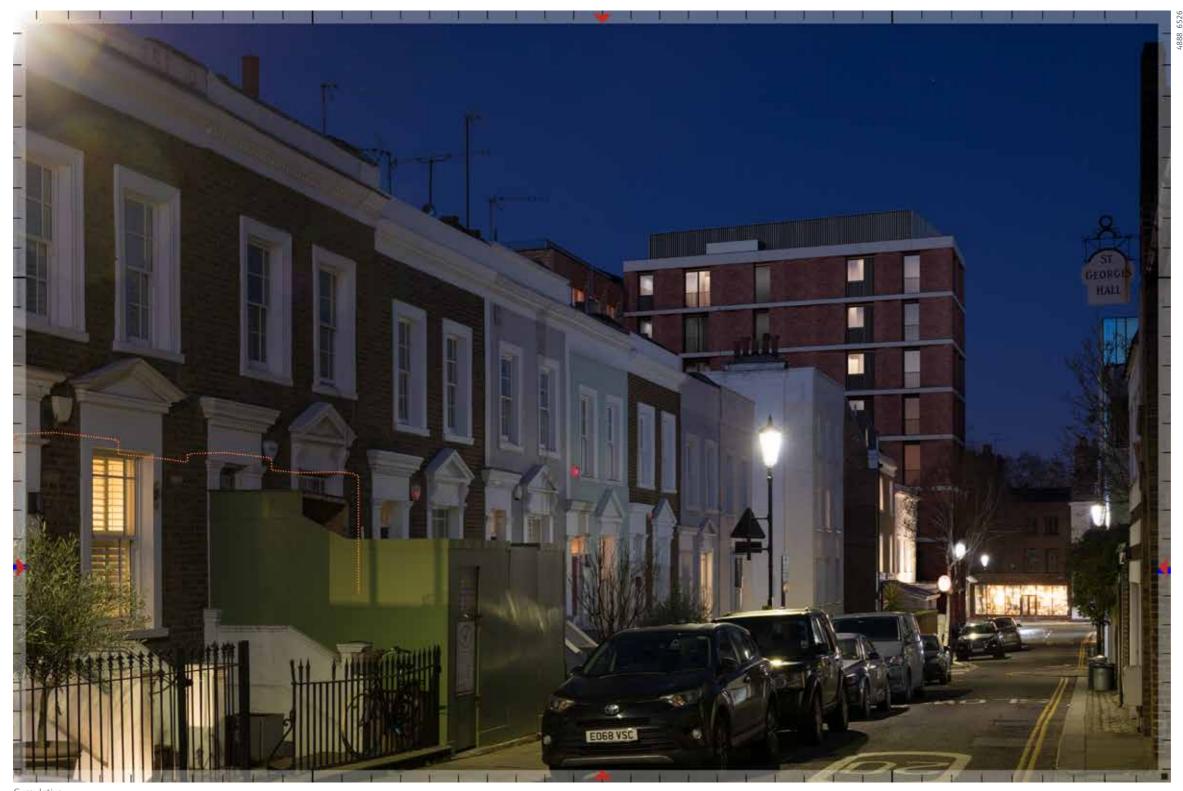
- 6.163 The street context within the view is as described for View 18. At night, the streetlights are the dominant form of external lighting within the view, although internal lighting within shopfronts on Kensington Church Street and external floodlighting of the Baptist Chapel are also eye-catching. Internal and some external lighting of houses is also evident.
- 6.164 This is view of **medium** sensitivity.



Proposed

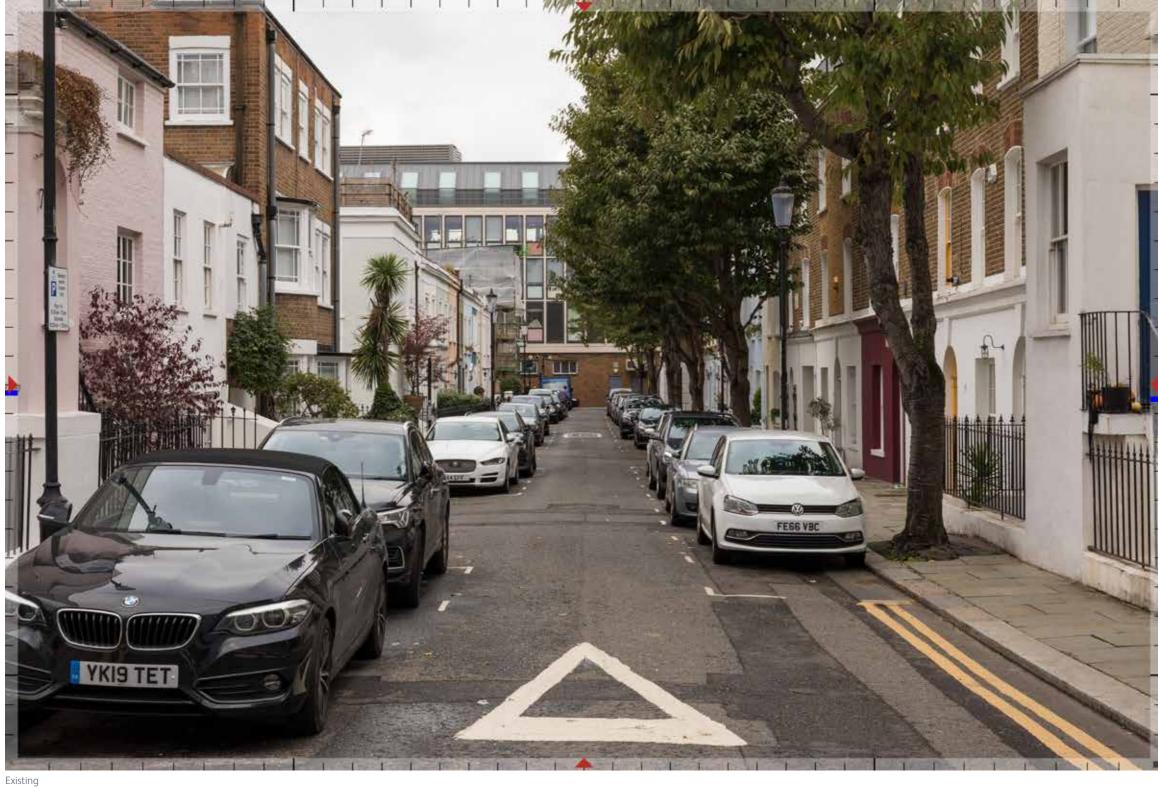
6.165 The appearance and visual impact of the Proposed Development would be broadly as described for the daytime view, albeit the detailed elevational approach would not be as visible at this distance. Internal lighting within the residential accommodation and medical use would be visible, in a similar manner to that within existing buildings in the view. The streetlights would remain the dominant external light source.

Magnitude of impact: medium

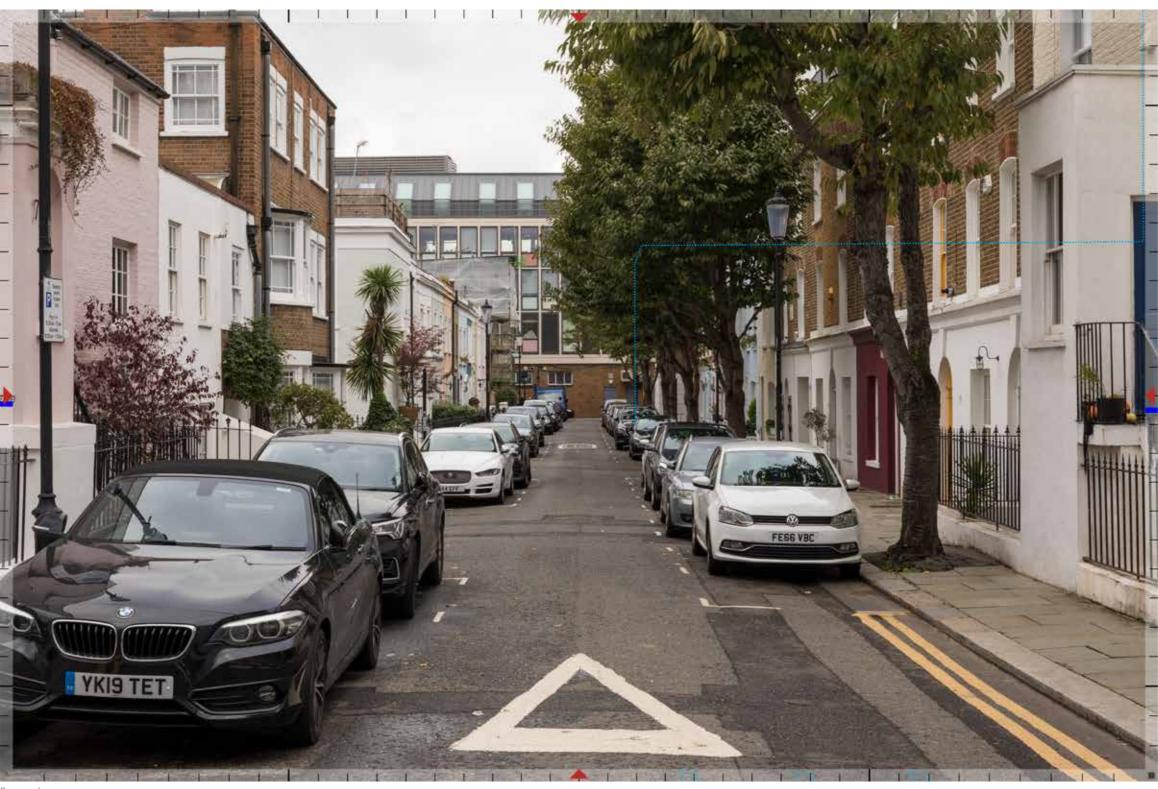


6.166 There would be no cumulative schemes visible in this view, and the effect would be unchanged compared to that for the Proposed Development considered on its own.

Magnitude of impact: medium



- 6.167 This viewpoint is located on the southern side of Kensington Place, approximately 45m south-west and west of the Site, and the view is looking north along Jameson Street in the Kensington Conservation Area.
- 6.168 Jameson Street is lined with Victorian terraces of various heights, interspersed with a threestorey 1930s brick house. Small trees line the eastern side of the street. The view is terminated by the rear elevation of David Game House. Newcombe House is not visible from here.
- 6.169 This is a view of **medium** sensitivity.

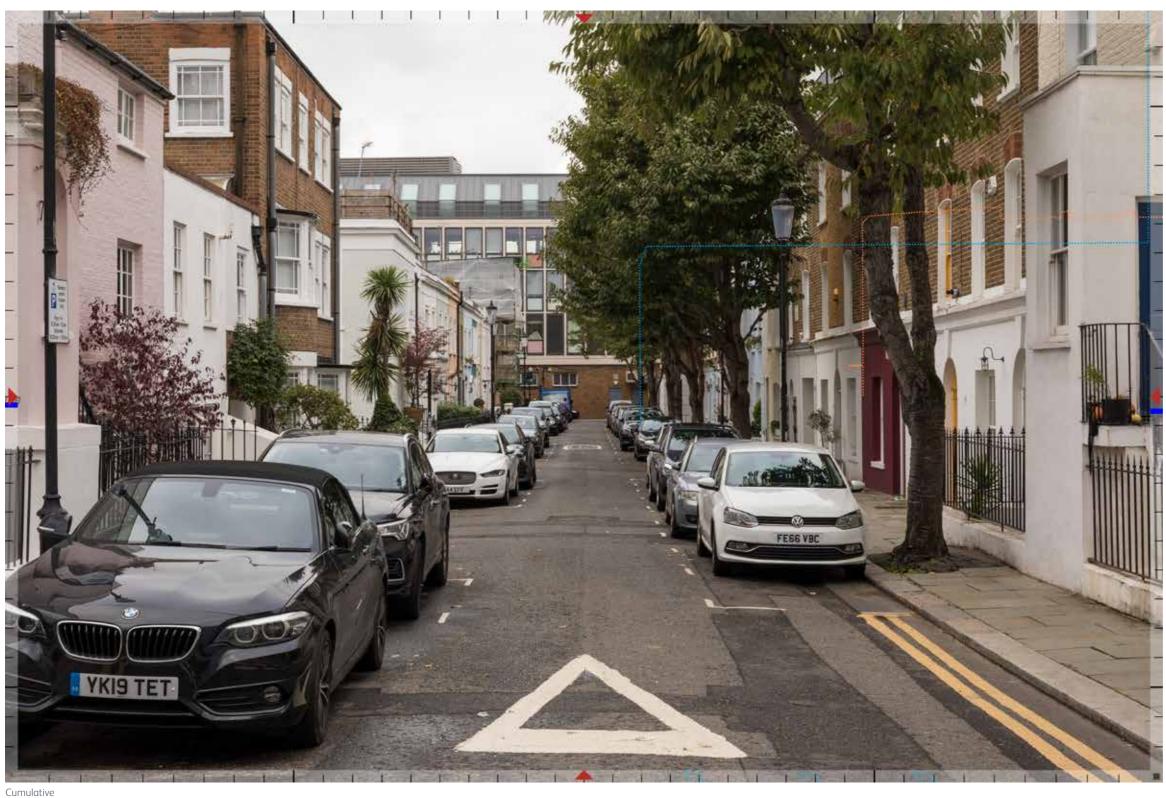


Proposed

6.170 The Proposed Development would not be visible and the view would be left unchanged.

Magnitude of impact: none

Scale and nature of effect: no effect



6.171 There would be no cumulative schemes visible in this view, and the effect would be unchanged compared to that for the Proposed Development considered on its own.

Magnitude of impact: none

Scale and nature of effect: no effect





- 6.172 This viewpoint is located on the southern side of Hillgate Place, at the junction with Jameson Street, approximately 40m west of the Site. It is located in the Hillgate Village sub-area of the Kensington Conservation Area.
- 6.173 Jameson Street is lined by a three storey early/ mid-19th century brick-faced terrace, which backs onto the Notting Hill Gate railway station cutting, occupying most of the foreground of the view. The rear of David Game House is visible at the end of the street on the left, with Newcombe House rising beyond towards the centre of the view, albeit largely screened from view by streets trees. The context of the terrace is clearly very urban.
- 6.174 The sensitivity of the view is **medium**.



- Newcombe Tower within the Proposed Development would appear in the centre of the view. While somewhat greater in apparent scale than the existing Newcombe House, it would remain below the height of the tree canopy in the foreground and it would be largely screened from view by the tree foliage in summer, such that it would be difficult to discern.
- 6.176 It would be more visible in winter, albeit remaining screened by branches to some extent. It would appear as a high quality marker of the District Centre in such winter views and would form part of a townscape layer within the view together with David Game House; while close to the historic terraces in the foreground, this layer of modern townscape would be clearly distinct and separate from them.

Magnitude of impact: low (summer), medium-high (winter)

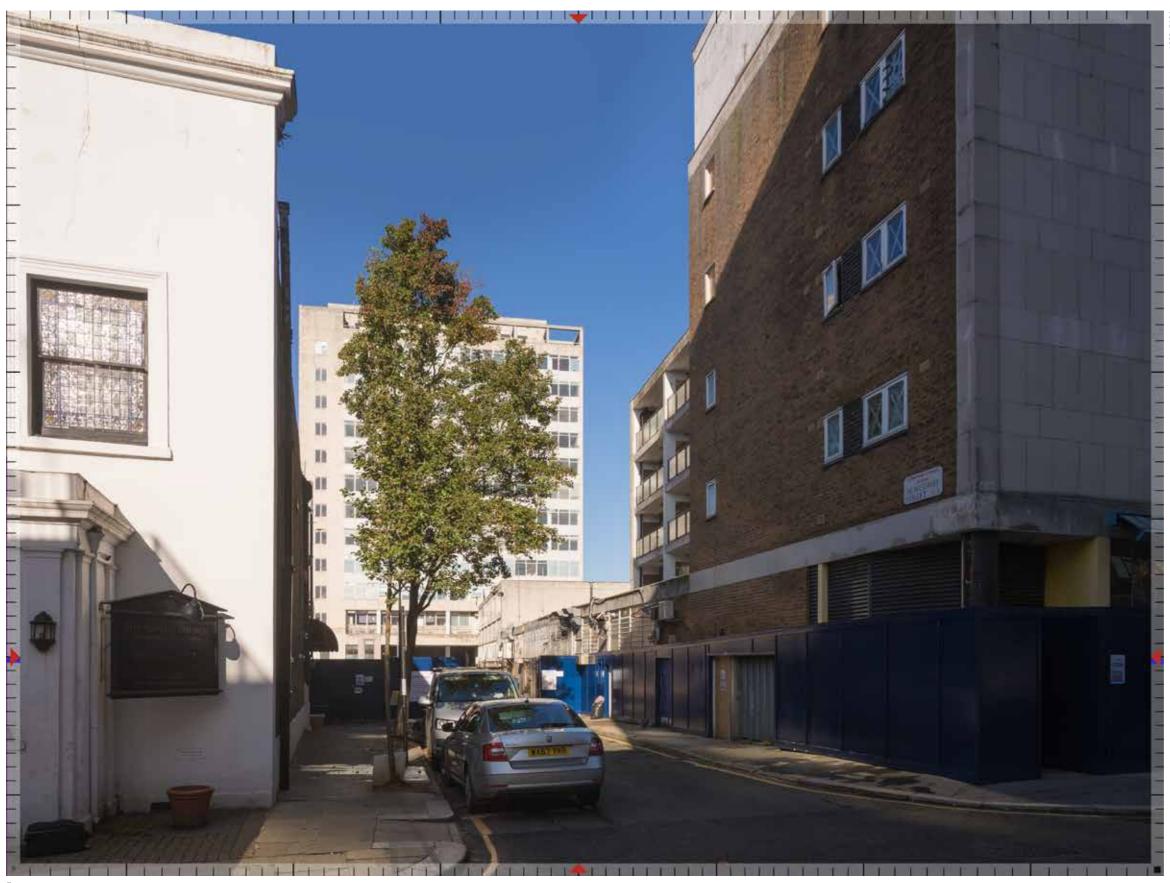
Scale and nature of effect: minor and neutral (summer), moderate-major and beneficial (winter).



6.177 There would be no cumulative schemes visible in this view, and the effect would be unchanged compared to that for the Proposed Development considered on its own.

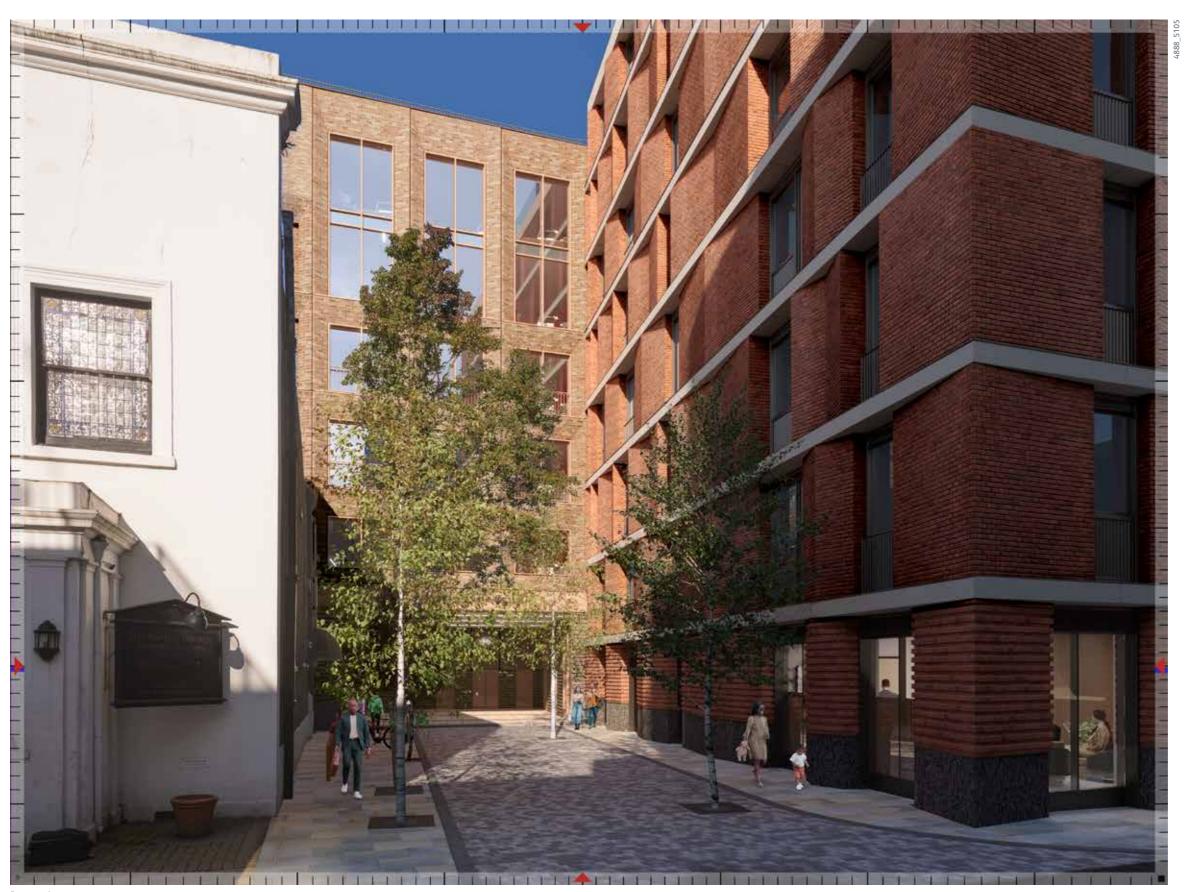
Magnitude of impact: low (summer), medium-high (winter)

Scale and nature of effect: minor and neutral (summer), moderate-major and beneficial (winter).





- 6.178 This viewpoint is located on the southern side of Kensington Place, immediately south of the southern end of the Site, and the view is looking north along Newcombe Street, the existing service road to the Site. This view location is in the Hillgate Village sub-area of the Kensington Conservation Area. The Site is not within $\boldsymbol{\alpha}$ conservation area.
- 6.179 To the west (left) is the mid-19th century rendered Kensington Place Bethesda Baptist Chapel (established 1866). Royston Court, a 1950s apartment block with ground floor retail on the southern end of the Site, lies to the east (right). Past the backs of the retail units on the right, refuse bins and a surface car park rises the broad south elevation of Newcombe House.
- 6.180 The undifferentiated massing and drab elevations of Newcombe House are detrimental to the quality of the view. Royston Court, with its bland frontages with little articulation or depth, similarly contributes nothing positive to the view, and the rest of the Site has a generally ad hoc and incoherent appearance. The townscape and architectural value of the view as a whole is therefore low, except for the Victorian Chapel.
- 6.181 This view is of **low-medium** sensitivity overall.



Proposed

6.182 While the Medical/ Affordable Block and the KCS Office Block would appear across much of the view at this short range from the Site, their apparent scale would not be overwhelming; the Medical/ Affordable Block would represent a modest increase in scale compared to Royston Court, while the set-back KCS Office Block would have a lower apparent height than the Baptist Chapel further in the foreground.

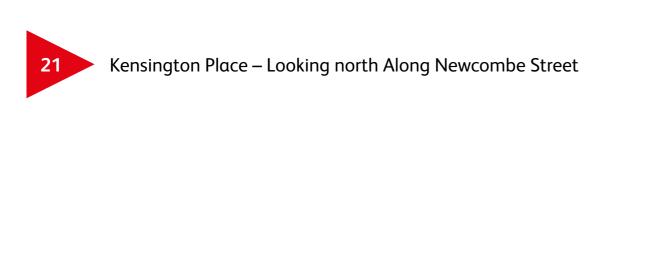
6.183 The buildings within the Proposed Development would provide strong definition of Newcombe Street and Kensington Place, and the medical reception in the ground floor of the Medical/ Affordable Block would provide some animation at ground floor to these streets. The proposed and additional tree planting and landscaping would enhance the public realm along Newcombe Street.

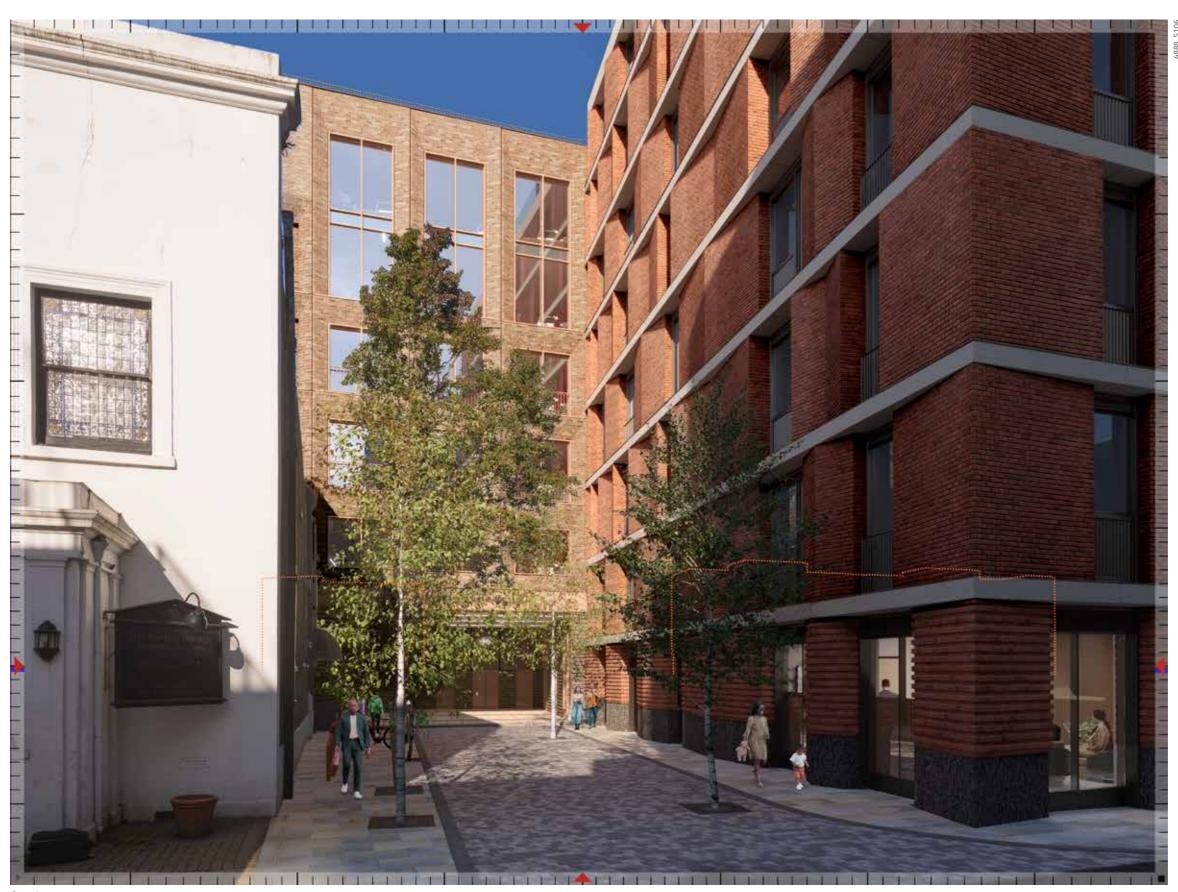
6.184 The Medical/ Affordable Block would have the character of a modern interpretation of the 19th and early 20th century apartment blocks in the local area, with its regular window bays and use of red brick and concrete as materials. The angling of the reveals would provide its frontages with depth and articulation, and variety from floor to floor, and the channelled nature of the ground floor would provide visual interest at a detailed level. The KCS Office Block would have a calm and ordered façade based on regular bays, with the graduation from single to double-height glazing in the upper floors providing a sense of order.

6.185 Taken together, the Medical/ Affordable Block and the KCS Office Block would appear as related and forming part of a coherent whole while having sufficient differences to provide visual variety. They would replace a messy view across the existing Site with a view that would have a composed quality, and they would provide the Baptist Chapel with a much improved urban context.

Magnitude of impact: high

Scale and nature of effect: major, beneficial



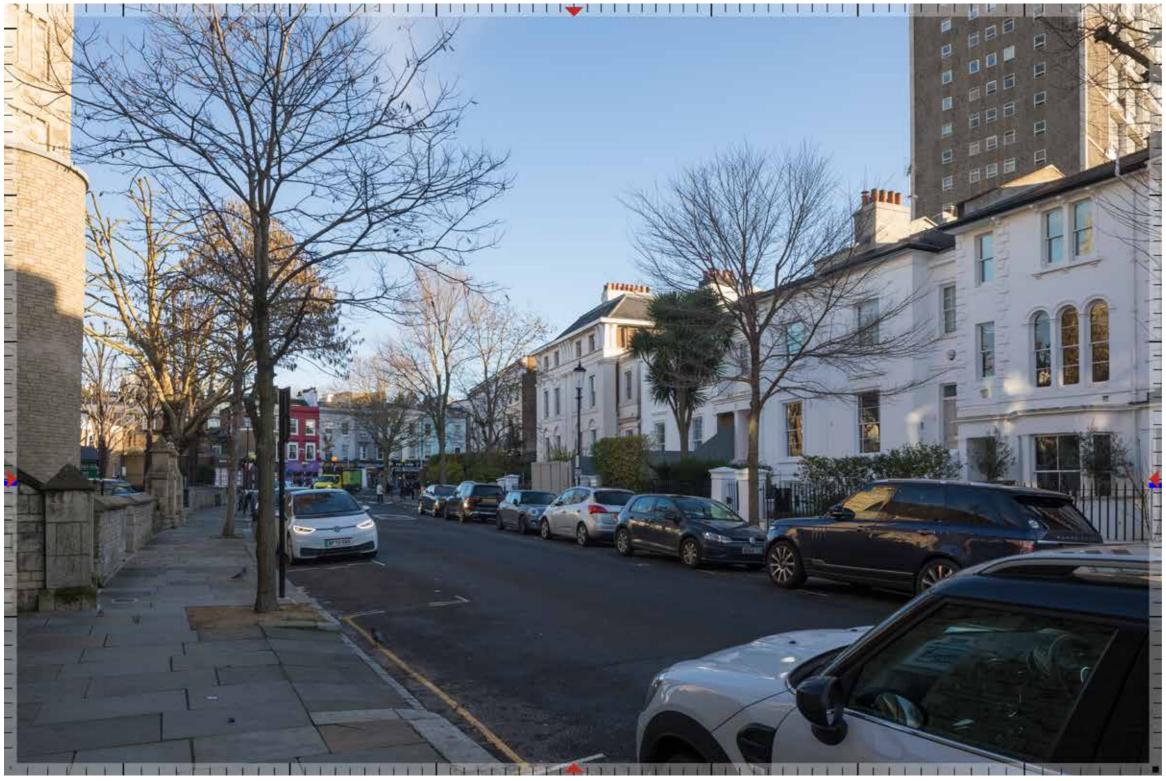


Cumulative

6.186 There would be no cumulative schemes visible in this view, and the effect would be unchanged compared to that for the Proposed Development considered on its own.

Magnitude of impact: high

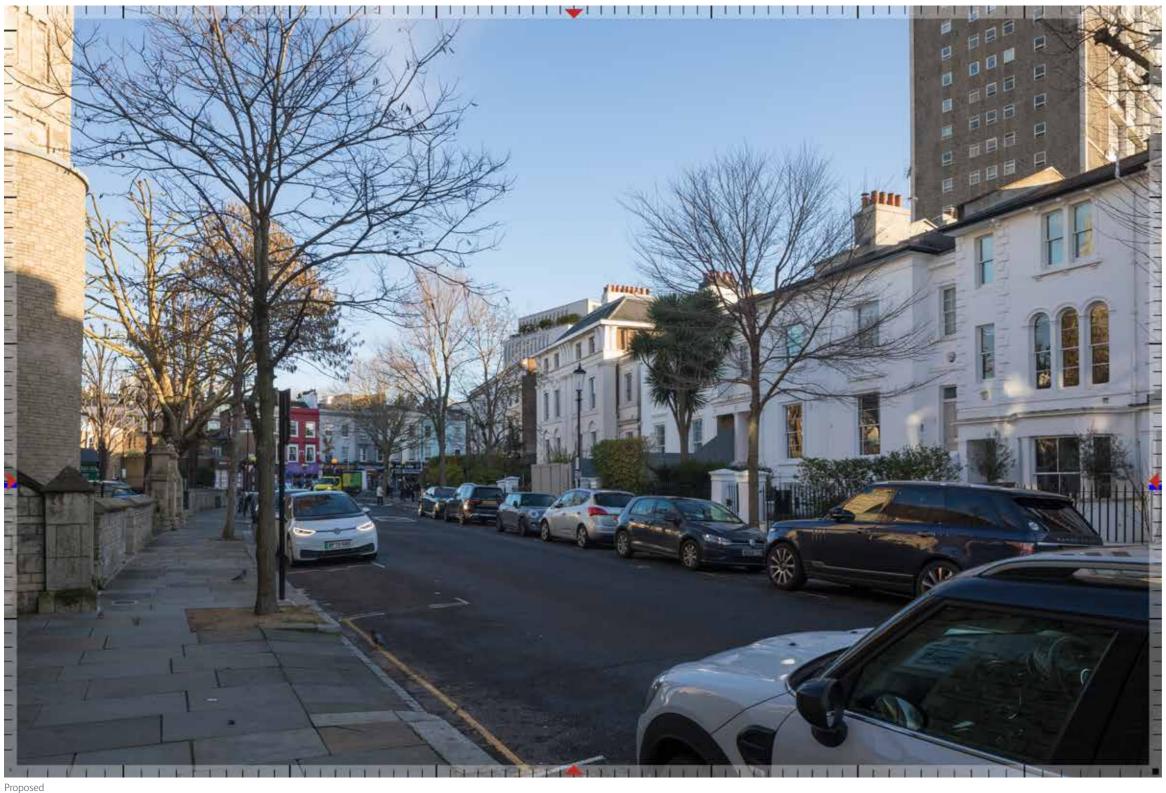
Scale and nature of effect: major, beneficial





- 6.187 This viewpoint is located on the northern side of Ladbroke Road, approximately 230m northwest of the Site, and the view is looking southeast. It is located in the Ladbroke Conservation Area.
- 6.188 The southern side of the road, right in the image, includes three-four storey stucco rendered mid-19th century residential buildings. Campden Hill Tower defines the western end of the Notting Hill Gate District Centre, rising above the stucco buildings on Ladbroke Road on the right side of the image, but Newcombe House is not visible.
- 6.189 This is a view of **medium** sensitivity.

Existing

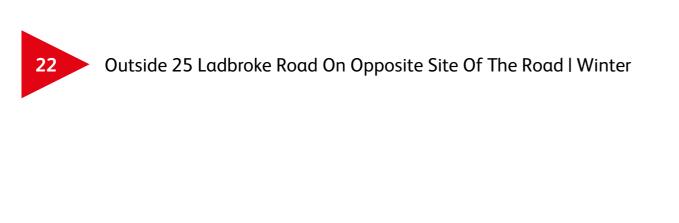


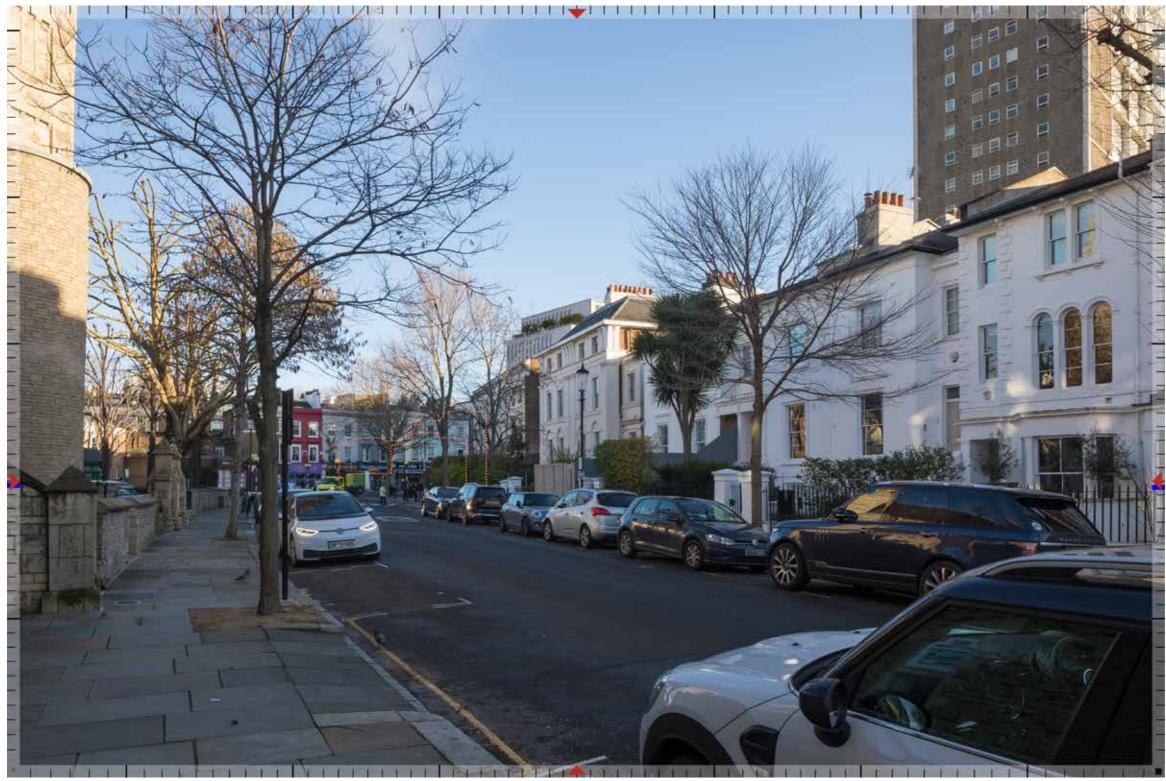
Part of the upper floors of the Newcombe Tower within the Proposed Development would appear in the middle distance, behind houses within the Ladbroke Conservation Area. While a new addition to the skyline from this position, the Proposed Development's appearance in the view would be consistent with the existing character of the view, which includes Campden Hill Towers appearing at a much greater apparent height directly behind houses on the southern side of Ladbroke Road. The Proposed Development would form part of a background layer of townscape with Campden Hill Towers, distinct and separate from the houses in the foreground, and acting as a high quality landmark for the District Centre.

6.191 The regular and ordered elevations of the Proposed Development, and the light materials with terrace garden, would be apparent to some extent at this distance.

Magnitude of impact: low

Scale and nature of effect: minor, neutral





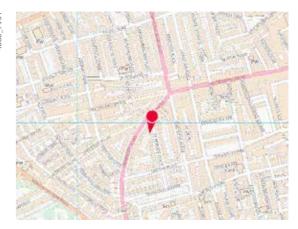
Cumulative

There would be no cumulative schemes visible in this view, and the effect would be unchanged compared to that for the Proposed Development considered on its own.

Magnitude of impact: low

Scale and nature of effect: minor, neutral





- 6.193 This viewpoint is located on the eastern side of Pembridge Place, at the junction with Pembridge Villas, approximately 600m north of the Site, and the view is looking south. It is within the Pembridge Conservation Area.
- 6.194 An avenue of trees along Pembridge Place screens buildings to some extent, although the white stucco houses along Pembridge Place remain visible. Newcombe House is not visible.
- 6.195 This is α view of **medium** sensitivity.



Proposed

6.196 The top eastern part of the proposed Newcombe Tower would be visible. It would lie in the middle distance and would be screened by tree branches to a considerable extent, even in winter, and is likely to be barely discernible through foliage in summer. It would appear separate and distinct from the buildings within the Pembridge Conservation Area in the foreground of the view, and to the limited extent that it would be visible, its light colouration would relate well to the stucco buildings of Pembridge Place.

> Magnitude of impact: low (winter), very low (summer)

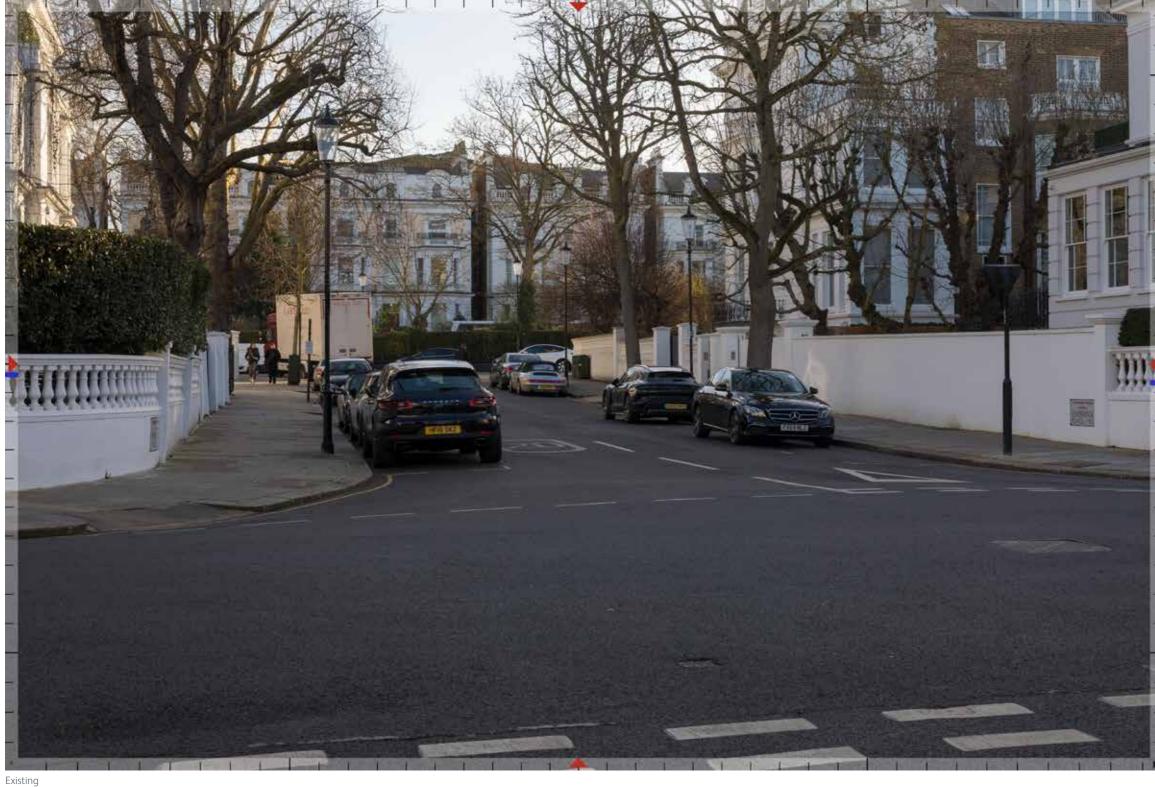
> Scale and nature of effect: minor (winter), negligible (summer), neutral

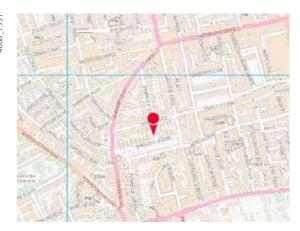


6.197 There would be no cumulative schemes visible in this view, and the effect would be unchanged compared to that for the Proposed Development considered on its own.

> Magnitude of impact: low (winter), very low (summer)

> Scale and nature of effect: minor (winter), negligible (summer), neutral





- 6.198 This viewpoint is located on Pembridge Place, at the junction with Dawson Place. It is located further south than the previous view, approximately 400m north of the Site, and the view is looking south. It is within the Pembridge Conservation Area.
- 6.199 The rear facades of two of the listed buildings on Pembridge Square are visible, with the stucco fronted buildings on the southern side of the square, also listed, visible further in the distance through the trees. Newcombe House is not visible.
- 6.200 This is a view of **medium** sensitivity.



Proposed

6.201 The top of the Newcombe Tower within the Proposed Development would appear in the middle distance. It would be screened to a considerable extent by tree branches in this winter view, and in summer it is likely that it would be barely discernible through foliage, if at all.

6.202 While visible behind listed buildings on the southern side of Pembridge Square, the Proposed Development would appear further in the distance and clearly separate from them. To the limited extent it could be seen and appreciated, it would appear as a high quality landmark for the District Centre, with materials that would relate well to the foreground buildings.

> Magnitude of impact: low (winter), very low (summer)

> Scale and nature of effect: minor (winter), negligible (summer), neutral



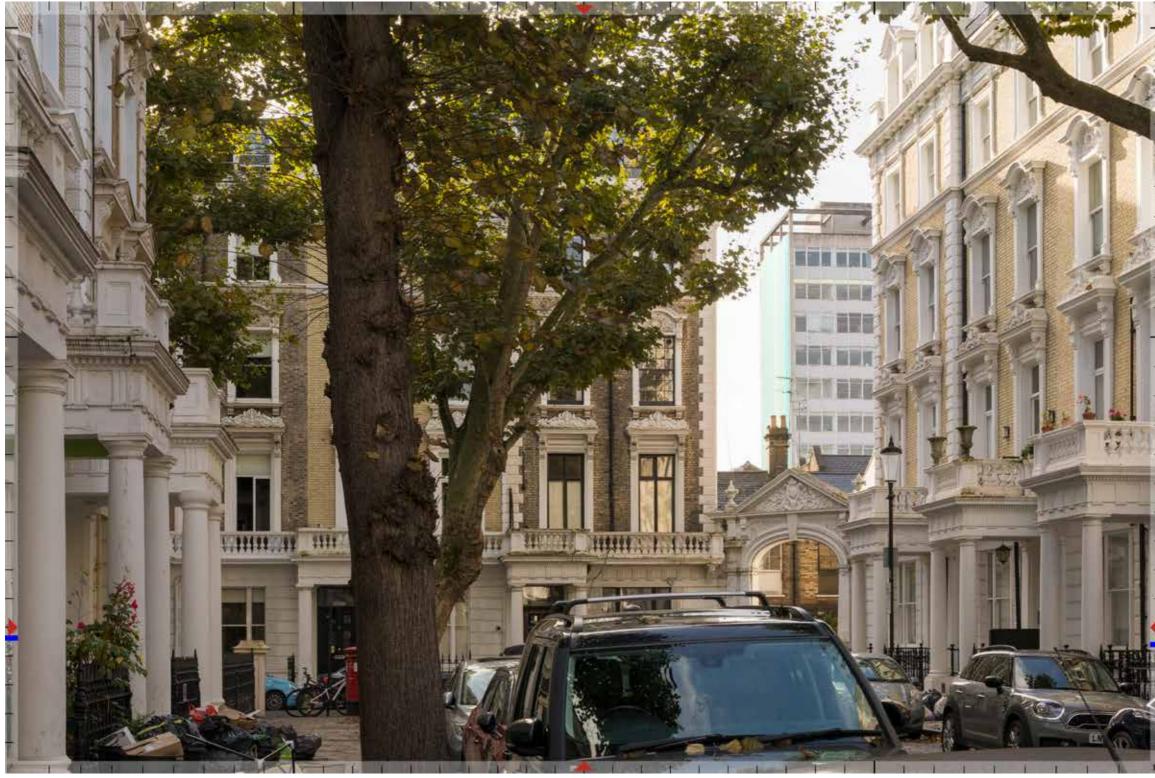
Cumulative

6.203 There would be no cumulative schemes visible in this view, and the effect would be unchanged compared to that for the Proposed Development considered on its own.

> Magnitude of impact: low (winter), very low (summer)

> Scale and nature of effect: minor (winter), negligible (summer), neutral

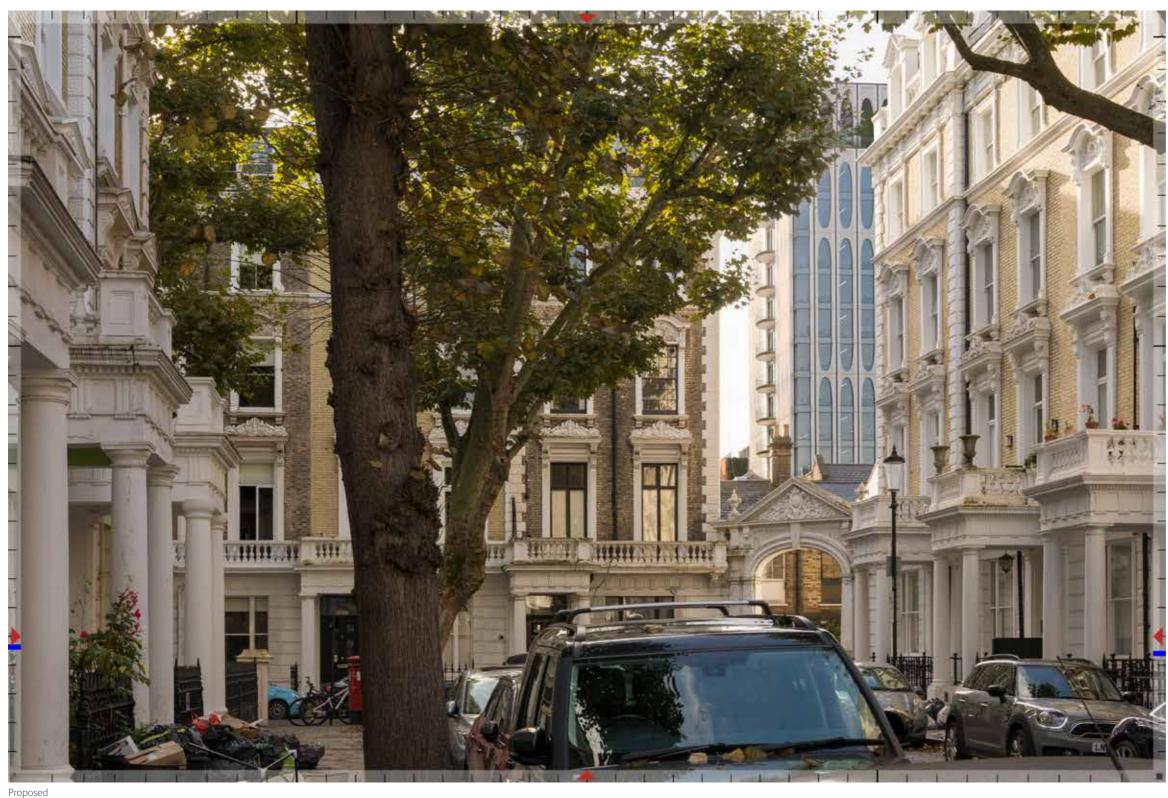
Cumulative







- 6.204 This viewpoint is located in the western section of Linden Gardens, which takes a loop form, and on the eastern side of the street, approximately 125m from the Site. The view is looking south in the direction of the Site.
- 6.205 This view is towards the southern end of the Pembridge Conservation Area and is taken where the mid-19th century Italian Renaissance style terraced houses create a tight enclosure to the street space – a little further north the street enclosure is fragmented by the underground tube line. The four storey terraced houses, of brickwork with stone dressings including porticos and heavily modelled door and window cases, have a tall, vertical emphasis.
- 6.206 Newcombe House, located across Notting Hill Gate, is visible through the corner gap beyond the grade II listed entrance arch from Linden Gardens, and contrasts with the dominant foreground character. It is drab in appearance, with undifferentiated massing.
- 6.207 This is a view of **medium** sensitivity overall.



The Proposed Development would appear to the right of centre in the image. While the Newcombe Tower within it would have a noticeably greater apparent scale than the existing Newcombe House, its apparent height would be lower than that of the buildings closest to the viewpoint, and would sit comfortably in the view overall. It would appear separate and distinct from the historic buildings in the foreground. A small part of the KCS Office Block would also be visible, with minimal visual impact.

The Proposed Development would be of substantially higher quality than the existing building on the Site. The expression of the Newcombe Tower as being formed of three linear elements of different heights would be evident to some extent from this point, helping to break up its overall massing and providing it with a distinctive form. The architecture would have a clear sense of order, with window bays arranged in a regular manner horizontally, and arranged into progressively smaller groups vertically. The frontages of the Newcombe Tower would have a considerably greater sense of depth and articulation than those of the existing building, and its light colouration would relate well to the buildings in the foreground.

Magnitude of impact: medium

Scale and nature of effect: moderate, beneficial

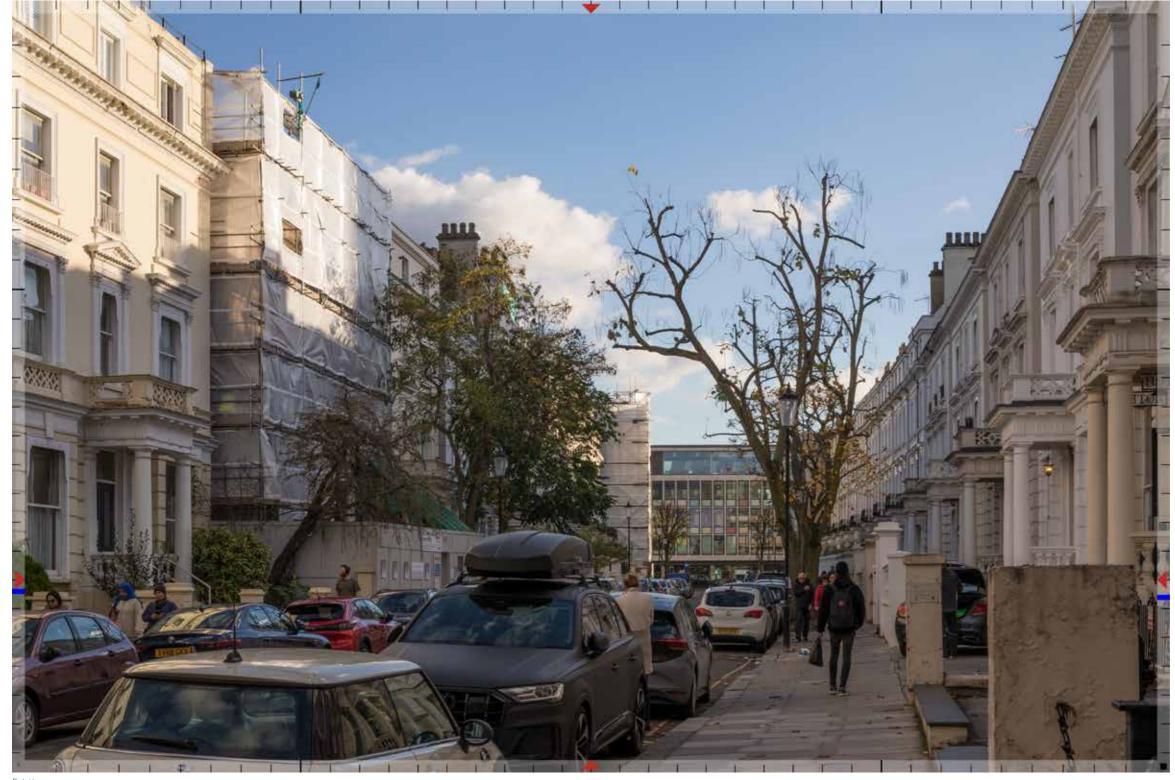


Cumulative

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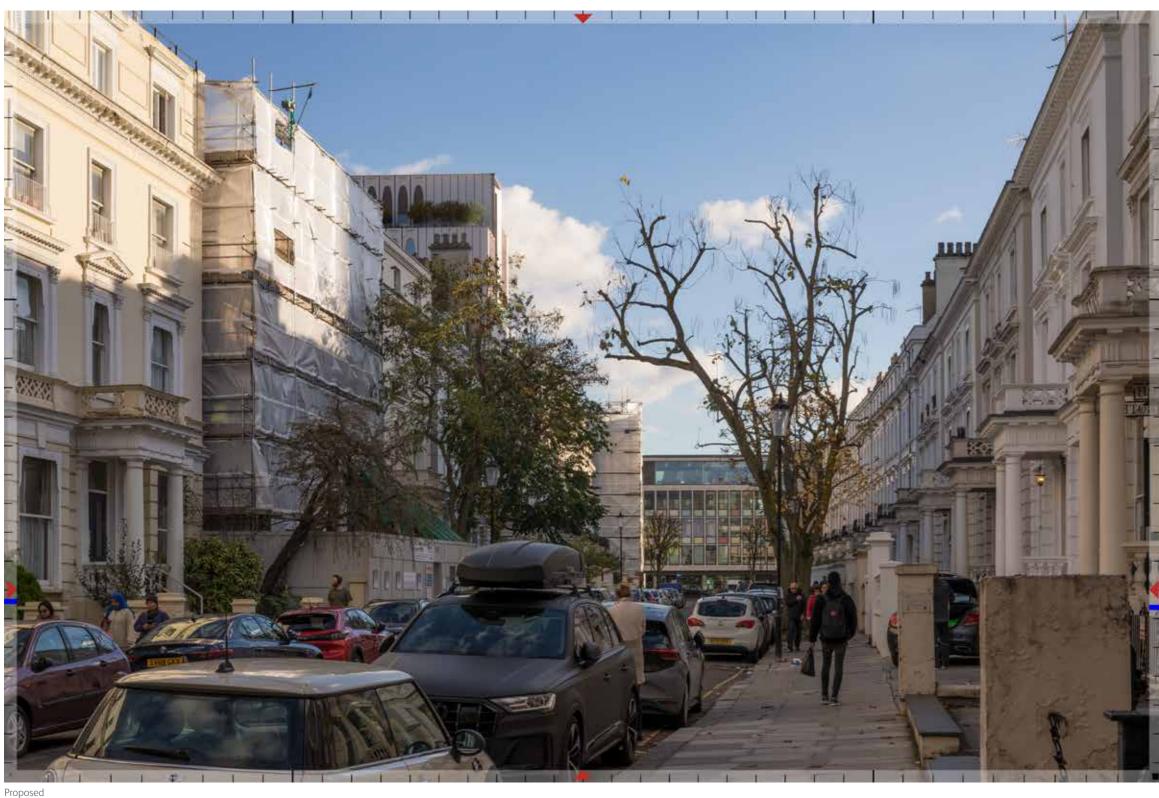
Magnitude of impact: medium

Scale and nature of effect: moderate, beneficial





- 6.211 This viewpoint is located on the western side of Pembridge Gardens, approximately 75m from the Site, and the view is looking south in the direction of the Site. It is located within the Pembridge Conservation Area.
- 6.212 The street is lined with grade II listed mid/late 19th century terraces of four storeys in height including attics, with roof dormers above. A 'bottle neck' narrows the street where it meets Notting Hill Gate with two modern buildings: the earlier of the two on the left exposes its brick party wall (under scaffolding at the time of the photograph).
- 6.213 The top of Newcombe House rises to a small extent to one side across Notting Hill Gate, screened to a considerable extent by trees, and David Game House, with its multi-coloured spandrel panels, concludes the street vista. Pembridge Gardens therefore has an established modern urban context that includes a tall building, but the quality of the modern architecture is mixed.
- 6.214 This is a view of **medium** sensitivity.



6.215 Part of the Newcombe Tower within the Proposed Development would appear to the left of centre within the image. While it would have a noticeably greater apparent scale than the existing Newcombe House, its apparent height would be lower than that of the buildings closest to the viewpoint and would sit comfortably within the view overall.

6.216 The Proposed Development would be of substantially higher quality than the existing building on the Site. While its distinctive form and high quality architecture would not be fully apparent, the expression of the proposed Newcombe Tower as being formed of three linear elements of different heights would be evident to some extent, as would the arrangement of window bays in an ordered and regular manner. The light colouration of the proposed Newcombe Tower would relate well to the stucco buildings in the foreground, and the garden terrace would be an attractive feature towards the top of the building.

Magnitude of impact: medium

Scale and nature of effect: moderate, neutral



6.217 The cumulative scheme at 66-74 Notting Hill Gate would be visible at the end of Pembridge Gardens, closer to the viewpoint than the Proposed Development, and with a lower apparent height. It would have limited visual impact but to the extent it would be seen it would consolidate the existing character of the view.

Magnitude of impact: medium

Scale and nature of effect: moderate, neutral



- 6.218 This viewpoint is located on the eastern side of Kensington Palace Gardens, approximately 280m south-east of the Site, and the view is looking north-west. This is a private road with restricted access, and it is located within the Kensington Palace Conservation Area.
- 6.219 The houses at the northern end of the street, as seen in this view, are mostly Italianate, while those at the southern end are mostly in the Queen Anne style. For much of the 20th century a large proportion of the houses were occupied by embassies and ambassadors' residences, though now some are privately owned.
- 6.220 Nos. 18-19 Kensington Palace Gardens, on the left side of the image, is grade II* listed. No. 20 to its right is grade II listed. Newcombe House is visible in the distance between them, albeit obscured by trees to a considerable extent, even in this winter image.
- 6.221 This is a view of **medium** sensitivity.



Proposed

Part of Newcombe Tower would be visible to the left of centre in the image; while somewhat taller than the existing Newcombe House, the Newcombe Tower would remain lower in apparent height than the mansion houses in the foreground. A small part of the top of the KCS Office Block would be seen at a much lower apparent height than the Newcombe Tower, and would be barely discernible at this distance. Both new buildings would be seen in the middle distance and screened to a considerable extent, including by evergreen trees. They would be an unobtrusive background element in the view, distinct and separate from the listed buildings and Conservation Area closer to the viewpoint.

6.223 To the limited extent it would be seen, the regular bays of the Newcombe Tower would have a strong sense of order and the cladding would provide depth and articulation. The light materials would relate well to the stucco houses in the foreground.

6.224 Considerably less of the Proposed Development would be visible in summer, reducing its visual impact.

> Magnitude of impact: low (winter), very low (summer)

> Scale and nature of effect: minor (winter), negligible (summer) neutral



6.225 There would be no cumulative schemes visible in this view, and the effect would be unchanged compared to that for the Proposed Development considered on its own.

> Magnitude of impact: low (winter), very low (summer)

> Scale and nature of effect: minor (winter), negligible (summer) neutral

Townscape Assessment

6.226 An assessment of the effect of the Proposed Development on the identified TCAs, informed by the views assessment, is set out below. While reference is made to heritage assets within TCAs, the assessments are of townscape effect only; reference should be made to the Heritage Statement prepared by MOLA for assessment of the effects of the Proposed Development on the heritage significance of heritage assets.

TCA 1: Notting Hill Gate

- 6.227 The Proposed Development would reinforce the character of this TCA as a District Centre containing medium to large scale modern and post-war buildings in close proximity to lower scale historic development. Maintaining the existing eastwest orientation of Newcombe House in the new Newcombe Tower would allow it to continue to have a dynamic visual relationship with Campden Hill Towers, which is aligned northsouth, and together they would help to mark the heart of the District Centre.
- 6.228 The Proposed Development would represent a substantial improvement on the existing buildings in terms of its architectural and visual quality, which would be of great benefit to the character of the TCA. The manner in which the Newcombe Tower would appear to comprise three linear elements of different heights would provide it with a visually interesting form and would contrast favourably with the undifferentiated massing of the existing tower. The architecture of the Newcombe Tower would have a strong sense of order, with a distinct base, middle part of the building, and top. The elevations would have depth and articulation, with the elliptical profile of the frame around the window bays and concave solid panels providing an elegant and distinctive appearance. The stepped form of the KCS Office Block would have a sculpted quality, and deep reveals to this building and the Medical/ Affordable Block would give substantial depth and articulation to the frontages of these buildings.
- 6.229 The provision of new public realm of a high quality including an improved public space on Notting Hill Gate and a wider pavement including a colonnaded area to Kensington Church Street – would be a significant benefit of the Proposed Development to this TCA. Other urban design enhancements would be provided by the animation of surrounding streets with active ground floor uses, and the opening up of a new route from Notting Hill Gate to Uxbridge Street.
- 6.230 The Proposed Development would be consistent with the broad form and scale of existing buildings which form part of the context in which the historic elements within this TCA are experienced, and its architectural and visual quality would be much higher than that of the existing Newcombe House when seen in views together with such heritage assets in this TCA.

- 6.231 The ZVI indicates that there would be visibility of the Proposed Development along the whole length of this TCA. The views provided from within this TCA show that this visibility would be greatest closest to the Site, such that the greatest beneficial impact from the high architectural quality of the Proposed Development would be within approximately 100m of the Site. The extent of the Proposed Development's visibility would reduce markedly towards the eastern and western ends of the TCA as it would become more hidden by foreground buildings and would typically be screened by trees, often to a considerable extent.
- 6.232 The Proposed Development would have a high magnitude of impact on this TCA overall. Taking into account the **low-medium** sensitivity of the TCA, this would result in α moderate-major scale of effect. The nature of effect would be **beneficial**.

TCA 2: Kensington

- 6.233 The ZVI indicates that, in a similar manner to the existing development on Site, there would be widespread visibility of the Proposed Development in the northern half of this TCA (north of Edge Street, Kensington Place and Aubrey Walk) while visibility south of this would be limited (largely to the gap along the railway cutting extending south to Bedford Gardens, and along the main road of Kensington Church Street, which is aligned on the Site), with no visibility from much of this part of the TCA.
- 6.234 Where seen, the existing Newcombe House appears as a distinct element beyond this residential and low-scale TCA, lying in the near or middle distance and relating to a main road condition and a separate TCA covering the District Centre (which is also marked by other post-war and modern buildings, most notably Campden Hill Towers). Newcombe House is a drab townscape presence in such views, and the lower buildings on the Site along Kensington Church Street similarly detract from the townscape context around this TCA.
- 6.235 The Proposed Development would maintain the existing townscape relationship between TCA 2 and the TCA within which the Site sits, appearing as part of a separate townscape area beyond TCA 2 and comprising the District Centre. However, the visually interesting form and more varied massing of the Proposed Development compared to the existing buildings on the Site, and its substantially improved architectural and visual quality, would enhance the townscape views in which it would be seen from TCA 2.
- 6.236 The KCS Block would be particularly relevant to this TCA. The sculpted quality of this block would be visually interesting and the higher levels of the building would be effectively recessed away from the low rise residential area to the west of it in TCA 2. Deep reveals would give substantial depth to the frontages of the building, and the use of brick would be sympathetic to the materiality of many buildings in TCA 2.

- 6.237 The provision of new high quality public realm and urban design benefits would also be of benefit to this TCA, most notably the opening up of a new route from Uxbridge Street to Notting Hill Gate, allowing a more direct connection between TCA 2 and TCA 1, and the provision of a wider pavement including a colonnaded space along the western side of Kensington Church Street.
- 6.238 The Proposed Development would be consistent with the broad form and scale of existing buildings which form part of the local and wider townscape context in which the historic elements within this TCA are experienced, including the Kensington Conservation Area. Its architectural and visual quality would be much higher than that of the existing Newcombe House when seen in views together with heritage assets in this TCA.
- 6.239 The Proposed Development would have a magnitude of impact ranging from **low** in the southern part of the TCA to **medium-high** in the northern part of this TCA. Taking into account the **medium** sensitivity of the TCA, this would result in a scale of effects ranging from **minor** to **moderate-major**. The nature of effect would be **beneficial**.

TCA 3: Kensington Palace

- $\,$ 6.240 $\,$ The ZVI indicates that, in a similar manner to the existing development on Site, there would be considerable areas with some visibility of the Proposed Development in the northern part of the TCA, particularly along Kensington Mall and Kensington Church Street, while visibility south-east of these streets would be patchy and largely limited to small areas on the north-south routes of Brunswick Gardens and Palace Gardens Terrace.
- 6.241 Where seen, the existing buildings on the Site appear as elements relating to the District Centre, beyond this largely residential and low to medium scale TCA. They add nothing positive to the townscape context around this TCA. The Proposed Development would be similarly seen as a townscape element distinct and separate from this TCA. However, it would be a substantial improvement on the existing buildings on Site in terms of its more visually interesting form and massing, and its high architectural and visual quality, and it would enhance the townscape views in which it would be most visible from TCA 3.
- 6.242 The KCS Office Block and Medical/ Affordable Block would be particularly relevant to this TCA. The sculpted quality of the KCS Office Block would be visually interesting and deep reveals would give substantial depth to the frontages of the building. The regular arrangement of the bays would result in a rhythm and articulation to the Kensington Church Street frontage that would echo that of local terraced streets. The Medical/ Affordable Block, in its red brick and concrete materiality and frontages with regular bays, would relate well to the historic apartment blocks in seen from this TCA.

- 6.243 The provision of new high quality public realm and urban design benefits would also be of benefit to this TCA, most notably the provision of a wider pavement including a colonnaded space to Kensington Church Street and improved public space on the corner of Kensington Church Street and Notting Hill Gate.
- 6.244 The Proposed Development would be consistent with the broad form and scale of existing buildings which form part of the local and wider context in which the historic elements within this TCA are experienced, including the Kensington Palace Conservation Area. Its architectural and visual quality would be much higher than that of the existing Newcombe House when seen in views together with such heritage assets
- The Proposed Development would have a magnitude of impact ranging from **low** in the southern part of the TCA to **medium-high** in the northern part of the TCA. Taking into account the **medium-high** sensitivity of the TCA, this would result in a scale of effects ranging from **minor-moderate** to moderate-major. The nature of effect would be beneficial.

TCA 4: Pembridge

- 6.246 The ZVI indicates that, in a similar manner to the existing development on Site, there would be considerable areas of visibility of the Proposed Development in the southern part of the TCA, particularly along Pembridge Gardens and the western part of Linden Gardens, and small areas of visibility further north within the TCA, with no visibility from much of it.
- Views 25 and 26 demonstrate that visibility of the Proposed Development from Linden Gardens and Pembridge Gardens would relate primarily to the Newcombe Tower and be partial in nature. The Linden Gardens view is through a gap in the terrace and takes in the eastern part of the Newcombe Tower, while only the top western part of it would be seen from Pembridge Gardens. Although seen to a somewhat greater extent in these views than the existing Newcombe House, the Proposed Development would be a substantial improvement in terms of its more visually interesting form and massing, and its high architectural and visual quality. As for the existing development on Site, it would be seen as a townscape element distinct and separate from the townscape of TCA 4 in the foreground of the views.
- From other points of lesser visibility, a small amount of the Proposed Development would typically be seen, in an incidental manner and often screened by trees, with no significant impact on the townscape in the foreground.
- 6.249 The provision of new high quality public realm and urban design benefits would also be of benefit to this TCA, most notably the improved public space on the corner of Kensington Church Street and Notting Hill Gate which would be visible at the southern end of the TCA.

- 6.250 The Proposed Development would be seen, in a similar manner to the existing development on the Site, as a small element of the local and wider context in which the historic elements within this TCA are experienced. While visible to a slightly greater extent than the existing development on Site in some views including such heritage assets, its architectural and visual quality would be much higher than that of the existing Newcombe House.
- 6.251 The Proposed Development would have a magnitude of impact ranging from **very low** in the northern part of the TCA to **medium** in the southern part of the TCA. Taking into account the **medium** sensitivity of the TCA, this would result in a scale of effect ranging from **negligible** to **moderate**. The nature of effect would be beneficial.

TCA 5: Ladbroke

- 6.252 The ZVI shows that, in a similar manner to the existing development on the Site, the Proposed Development would not be seen from most of the TCA. Visibility would be largely confined to the south-east corner of the TCA, particularly around the junction of Kensington Park Road and Ladbroke Road, with some visibility further north along Kensington Park Road.
- 6.253 Views 12 and 13 from Kensington Park Road show that the Proposed Development would be seen in the near or middle distance from these points, at a greater apparent scale than the existing Newcombe House and, in View 12, at a lower apparent height than Campden Hill Towers which is also seen in this view. It would form part of a background townscape elements in these views, denoting the District Centre of TCA 1, and distinct and separate from the townscape of TCA 5 in the foreground. The Proposed Development would be of much higher architectural and visual quality than the existing development on the Site in this and other such views.
- 6.254 View 22 from Ladbroke Road shows that, while it would form a new addition to the skyline from this position, the Proposed Development would appear consistent with the existing character of the view. It would be seen together with the existing Campden Hill Towers building and together with it would form part of a background layer of townscape marking the District Centre, distinct and separate from the houses in the foreground.
- 6.255 The provision of new high quality public realm and urban design benefits would also be of benefit to this TCA, most notably the improved public space on the corner of Kensington Church Street and Notting Hill Gate which would be close to the southern end of the TCA.
- 6.256 The Proposed Development would be seen, in a similar manner to the existing development on the Site, as a small element of the local and wider context in which the historic elements within this TCA are experienced. While visible to a slightly greater extent than the existing development on Site in some views including such heritage assets, its architectural

- and visual quality would be much higher than that of the existing Newcombe House.
- 6.257 The Proposed Development would have a magnitude of impact ranging from **very low** to **medium**, with the greatest impact at the south-east part of the TCA closest to the Site. Taking into account the **medium** sensitivity of the TCA, this would result in a scale of effect ranging from **negligible** to **moderate**. The nature of effect would be beneficial.

Townscape cumulative effects

- The three cumulative schemes are all located in TCA 1 and would reinforce the existing character of that TCA as a mixed-use District Centre containing a mix of medium and high-rise post-war and modern buildings together with lower scale historic buildings. Astley House and 146-164 Notting Hill Gate would represent considerable visual improvements on the previous or existing post-war buildings on these sites. As the cumulative schemes are low to medium rise, they would have little or no visual effect in respect of other TCAs.
- 6.259 Where seen with the Proposed Development, the mediumrise and horizontally emphasised nature of Astley House and 146-164 Notting Hill Gate would complement the townscape role of the Proposed Development, allowing the proposed Newcombe Tower to remain as one of an identifiable pair of taller buildings marking the heart of the District Centre, together with Campden Hill Towers.
- 6.260 Given their consistency with existing townscape character and limited visual impact, the cumulative schemes would not alter any of the overall assessments of the effect of the Proposed Development in respect of any TCA. The effects of the Proposed Development if the cumulative schemes were in place would remain the same as those for the Proposed Development considered on its own, as set out above.

7 Summary

- The Site is located in Notting Hill Gate District Centre, at the junction of an important east-west route through central London (Notting Hill Gate) with an important north-south route in the local area (Kensington Church Street). The existing buildings on the Site are drab, adding nothing positive to local and wider townscape and views, and the public realm around the Site is tired and unwelcoming.
- The Proposed Development would replace the existing buildings with three buildings of substantially higher architectural and visual quality. While the Proposed Development would have a greater overall scale than the existing development on Site, this increase would be a matter of degree rather than introducing a wholly new scale of development, and the design of the new buildings would effectively break down the appearance of their overall scale. The Proposed Development would be of a scale and architectural ambition commensurate with the location of the Site on a key junction in the District Centre.
- 7.3 The architecture of the Proposed Development would be of a high quality. The Newcombe Tower would have a visually interesting form, appearing to be composed of three linear elements of different heights in a manner that would also modulate the appearance of its overall massing. There would be a clear sense of order to its architecture, with an identifiable base, middle and top, and the grouping of window bays would provide it with a vertical emphasis. The elliptical frame to the window bays and concave solid cladding panels would have depth and articulation and would contribute to the frontages having an elegant appearance.
- The KCS Office Block would similarly have an identifiable base, middle and top, and elevations with a sense of order, including a rhythm of bays that would relate well to that of terraced plots in the surrounding residential areas. The manner in which the main building line on each floor would be progressively recessed from the west, and at the upper floors from the east, would effectively break up its overall scale. The predominantly brick materiality of the building would sit well with existing local buildings.
- 7.5 The Medical/ Affordable Block would have a relatively simple appearance, in red brick and concrete, with deep reveals to windows providing visual interest. It would echo, in a modern way, the form and appearance of more historic apartment blocks in the local area.
- The urban design and public realm benefits of the Proposed Development would be considerable. A new route would be opened up between Uxbridge Street and Notting Hill Gate, enhancing permeability. New public realm of a high quality would be provided around the Site, including Notting Hill Gate Square on Notting Hill Gate, and the pavement would be effectively widened through the provision of colonnaded space along Kensington Church Street.

- The verified views in the Section 6 assessment demonstrate that the greatest visual effects are on those views closest to the Site and along streets aligned on it, primarily Notting Hill Gate, Kensington Church Street, Kensington Park Road and Uxbridge Street. The visually interesting form of Newcombe Tower within the Proposed Development could generally be appreciated in such views, along with the strong sense of order in its architecture and the depth and articulation provided by the frame to the bays. In views along Kensington Church Street, the primarily brick frontages of the KCS Office Block and the Medical/ Affordable Block would relate well to the existing buildings in the view, and their frontages would have depth and articulation which would enliven the street scene compared to the drab existing buildings on the Site. The effect of the Proposed Development would be beneficial or neutral in each of the 27 assessed views.
- The images in Appendix A demonstrate there would be no or very low visibility of the Proposed Development from the viewpoints identified in Kensington Gardens, as shown through Views A1-A6, and in the viewpoints shown from Talbot Road, which are nearly 1km from the Site, with no significant visual effect arising in any of these views.
- The Proposed Development would reinforce and enhance the existing townscape character of the TCA in which it is located, TCA 1: Notting Hill Gate, which is that of a mixed use District Centre including both large scale post-war/ modern buildings, and lower scale historic buildings. It would be consistent with the existing relationship between TCA 1 and other TCAs in the local area, with the Proposed Development appearing as part of a separate townscape layer of development associated with a main road/ District Centre condition, distinct from the lower scale residential development which typically characterises the other TCAs. While the Proposed Development would be somewhat more visible and appear at a somewhat greater scale than the existing development on Site from other TCAs, the quality of townscape views in which it would appear would be enhanced through the high quality of its architecture. The improvements to permeability and the provision of high quality public realm would also be of benefit to the other TCAs, which all adjoin TCA 1.
- The cumulative schemes would reinforce the existing character of TCA 1 together with the Proposed Development, and would have little or no visual impact beyond that TCA. The linear form and medium rise nature of Astley House and 146-164 Notting Hill Gate would be complementary to the townscape role of the proposed Newcombe Tower as one of two taller, vertically emphasised buildings within the District Centre.
- The Proposed Development would be consistent with the existing townscape context in which heritage assets in the TCAs are experienced. It would be of a substantially higher visual quality than the existing buildings on Site when seen in views including heritage assets.

- 7.12 The Proposed Development would be consistent with planning policy and guidance in respect of its design quality and effect on townscape and views. In line with the Local Plan Policy CL12 Building Heights, the Proposed Development would constitute a rare taller local landmark building, which would have "...a wholly positive impact on the character and quality of the townscape." As required by the Local Plan Policy CL11 Views, the Proposed Development would protect and enhance views, vistas, gaps and the skyline that contribute to the character and quality of the area. In line with the Notting Hill Gate SPD, while the Proposed Development would represent a "modest increase in height over the existing building", it would provide "significant benefits to Notting Hill Gate" and deliver "an architecturally excellent building" which "does not have a harmful impact" on identified views.
- 7.13 The Proposed Development would be consistent with the draft local policy in the New Local Plan Review Publication, CD7: Tall Buildings, in that the Newcombe Tower would be of "…exemplary design quality…" including being "…well-integrated, at street level, with surrounding buildings and the streetscene…". It would have no significant effect in the views identified in Draft Policy CD14: Views and the Building Height SPD.
- 7.14 In summary, the Proposed Development would represent a substantial improvement on the existing situation on the Site, with a positive or neutral effect on views and townscape, and considerable urban design benefits.

References

- 1-1 Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended)
- 1-2 DCLG, National Planning Policy Framework (NPPF) (2021)
- 1-3 DLUHC, *Planning Practice Guidance (PPG)* (First published March 2014; thereafter continuously updated)
- 1-4 Ministry of Housing, Communities and Local Government (MHCLG) *National Design Guide* (2021)
- 1-5 Historic England, Historic England Advice Note 4: Tall Buildings (2022)
- 1-6 GLA, The London Plan 2021: Spatial Development Strategy for Greater London (March 2021)
- 1-7 GLA, London View Management Framework Supplementary Planning Guidance (LVMF SPG) (March 2012)
- 1-8 RBKC, Royal Borough of Kensington and Chelsea Revised Local Plan (September 2019)
- 1-9 RBKC, Royal Borough of Kensington and Chelsea New Local Plan Review Publication, Secretary of State submission (February 2023)
- 1-10 RBKC, Building Height in the Royal Borough SPD (September 2010)
- 1-11 RBKC, Notting Hill Gate SPD (May 2015)
- 1-12 WCC, Westminster City Council City Plan 2019-2040 (2021)
- 1-13 WCC, Metropolitan Views Draft SPD (October 2007)
- 1-14 WCC, Heritage, Views and Tall Buildings, Booklet No. 15 Westminster City Plan Revision (January 2015)
- 1-15 The Royal Parks, Kensington Gardens Management Plan (2016)
- 1-16 IEMA & The Landscape Institute, Guidelines for Landscape and Visual Impact Assessment (GLVIA) Third Edition (April 2013)
- 1-17 Landscape Institute, *Technical Guidance Note 06/19, Visual Representation of Development Proposals* (2019)
- 1-18 GLA, Character and Context Supplementary Planning Guidance (2014)
- 1-19 RBKC, Kensington Conservation Area Appraisal (KCAA) (February 2017)
- 1-20 RBKC, Pembridge Conservation Area Appraisal (PCAA) (2017)

- 1-21 RBKC, Ladbroke Conservation Area Appraisal (LCAA) (2015)
- 1-22 WCC, Bayswater Conservation Area Audit (CAA) (2000)
- 1-23 RBKC, Kensington Palace Conservation Area Proposals Statement (1997)

Appendix A

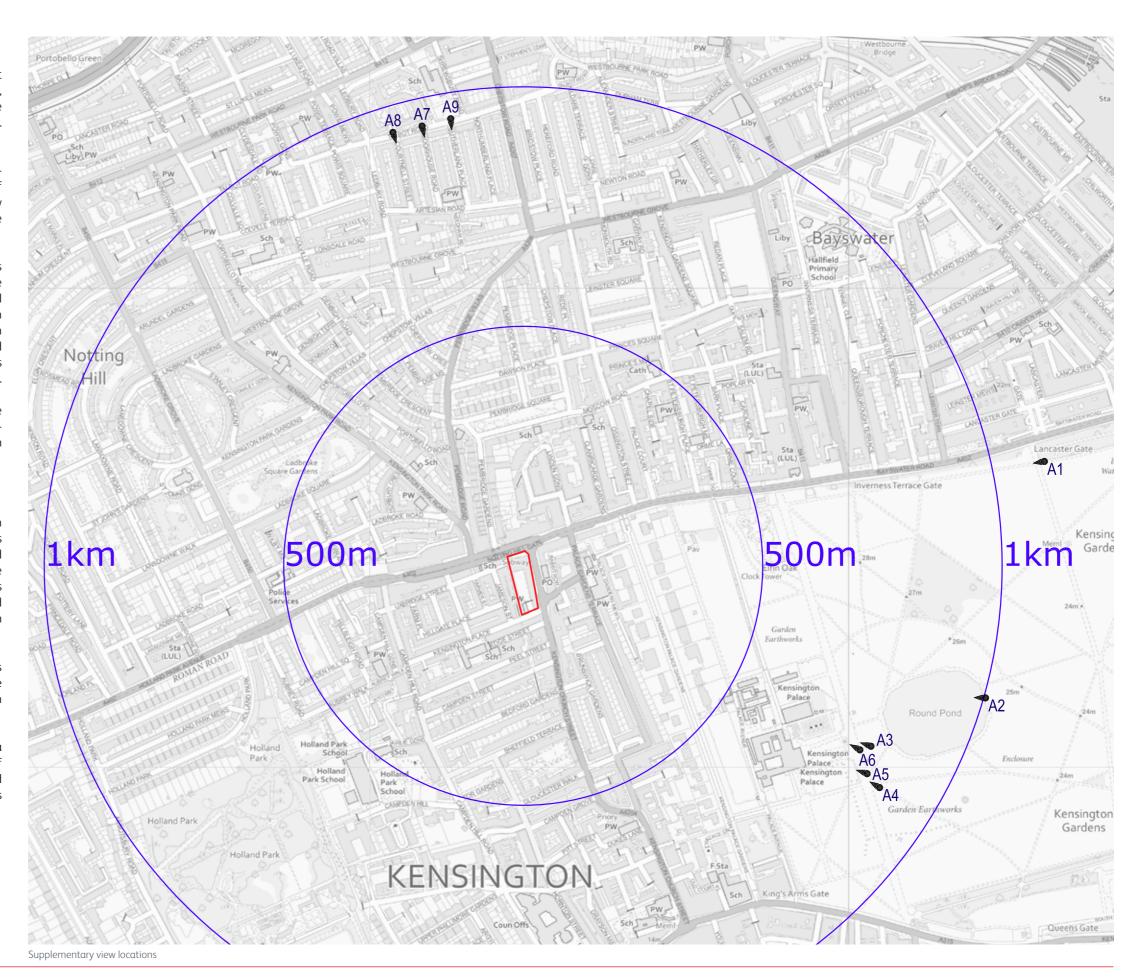
Supplementary Views

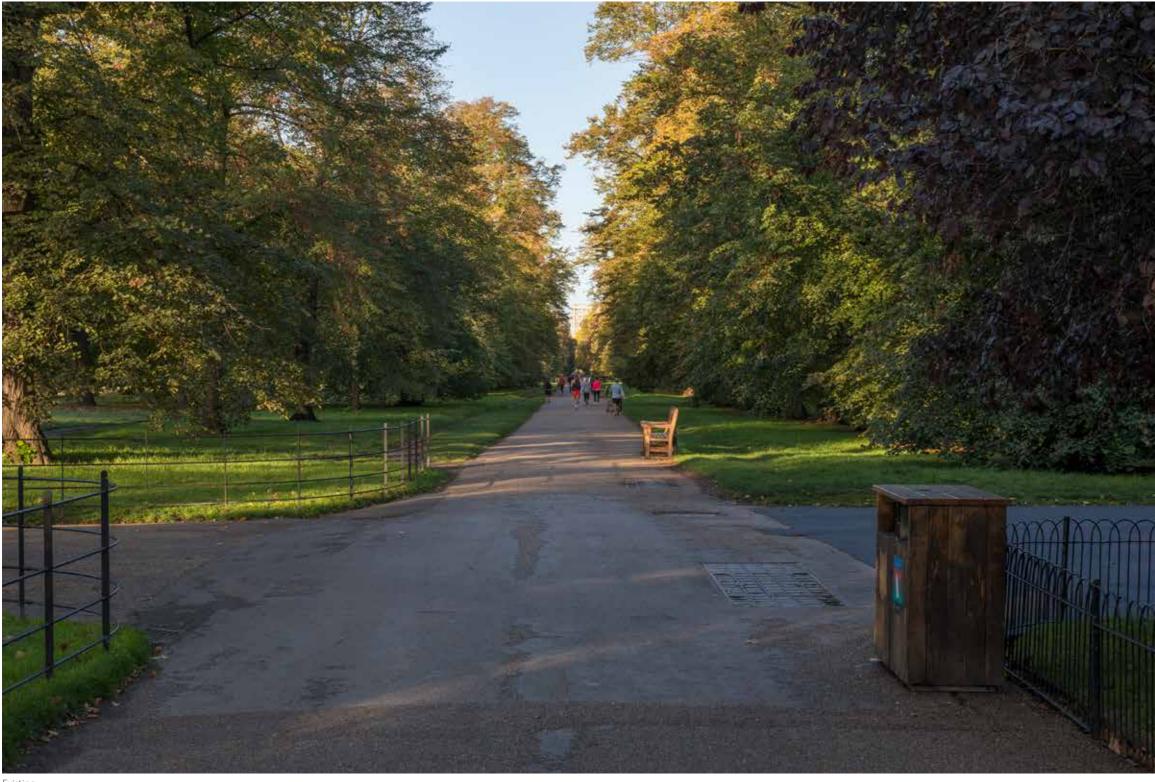
Introduction

- This following pages contain views prepared to supplement the AVRs in the main section of the report. In these views, the Proposed Development would either not be visible in the supplementary views or would be a minor visual presence. Accordingly, it was not necessary to prepare an AVR.
- A1.2 Each view is presented as a series of images showing a photograph of the existing condition alongside a study renders of the propsoed and cumulative conditions. These images show the massing of the Proposed Development combined with the Miller Hare London Model, including key consented schemes.
- Subject to the accuracy of the CAD model, these studies provide an accurate and consistent method for assessing the location, size, visibility and architectural form of the proposal relative to its context. The digital photograph taken from approximately the same location provides direct validation of the study render, and the photograph and render should always be assessed together in order that any differences between the model and the current state are made manifest.
- A1.4 Where it is likely that the Proposed Development will be discernible, and outline of the scheme has been superimposed on the study render in order to make clear the location of the Proposed Development.

Process – Comparative views

- From each view position a digital photograph has been taken using a conventional digital camera. Each location has also been recorded with supplementary photographs and field notes to allow its precise location to be revisited The National Grid coordinates and AOD height of the positions from which the photograph was taken have been estimated using field records, available mapping and using data from The London Model.
- A1.6 Using these estimated view coordinates a virtual camera has been defined. The Field of View and direction of view have been matched to the photograph by eye and have not been verified by survey.
- A CAD model was prepared by combining an extracted area of the Miller Hare London Model with the CAD models of the Proposed Development and models of other consented schemes. The full list of schemes used in the study render is shown in Appendix A1 "Supplementary Views"







Existing

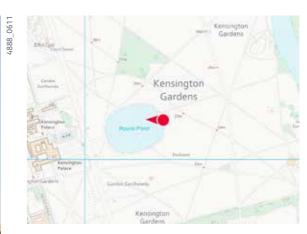


Proposed



Cumulative























Proposed





Cumulative





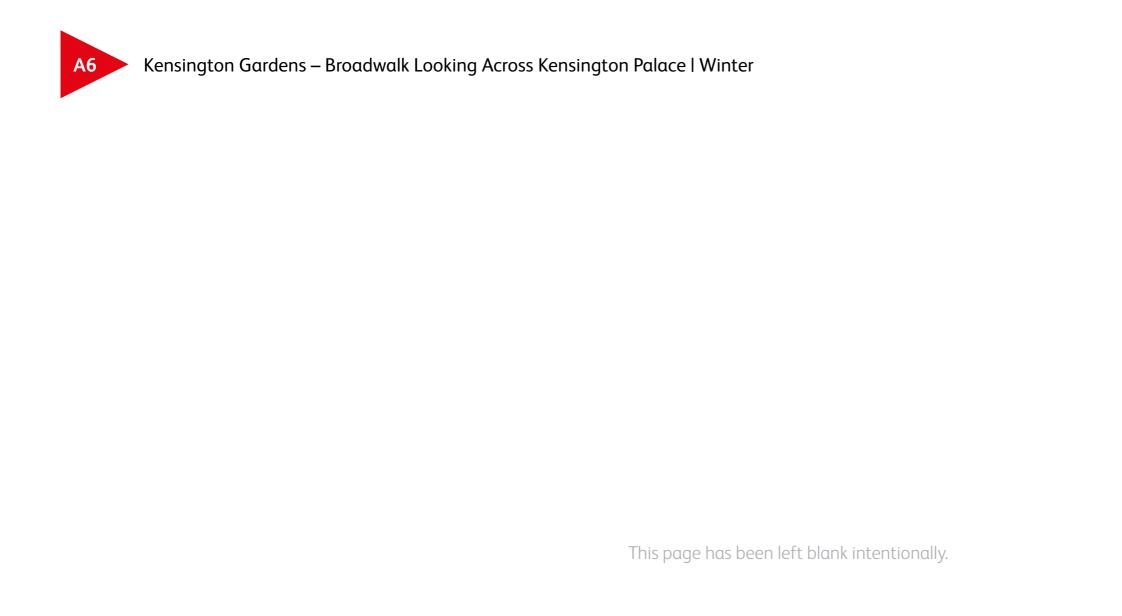


















Existing





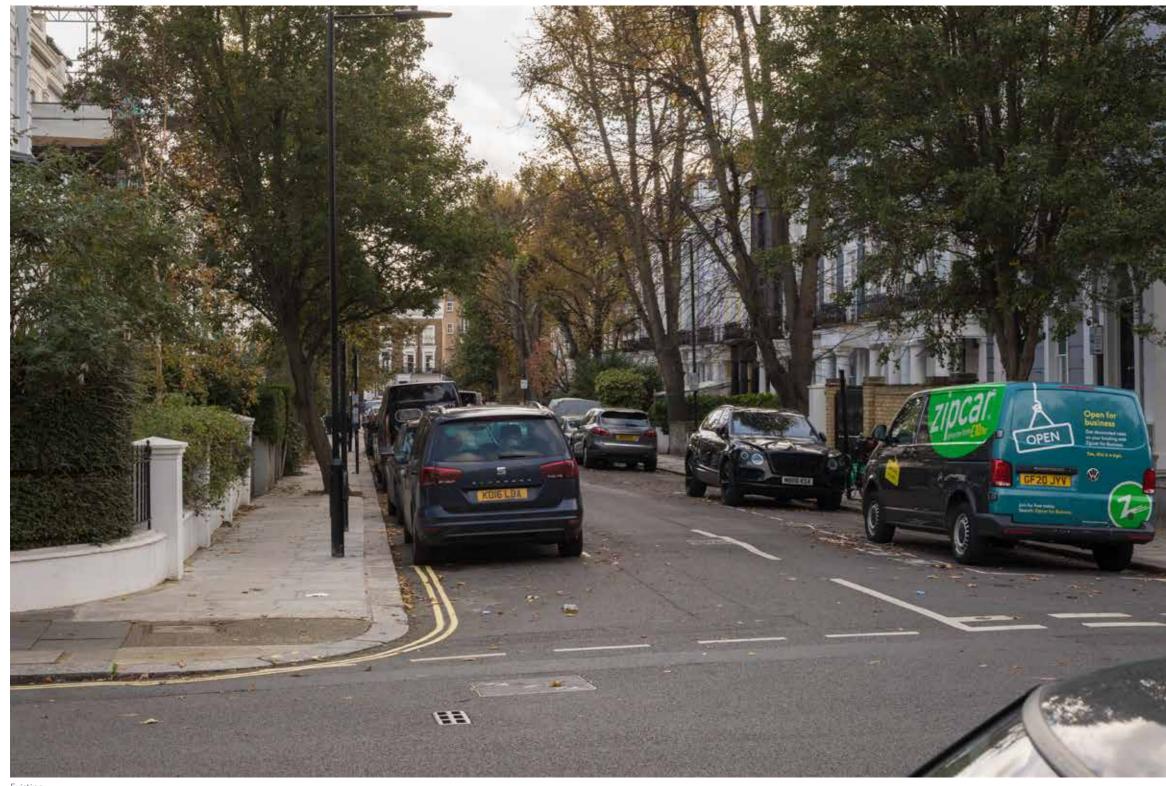


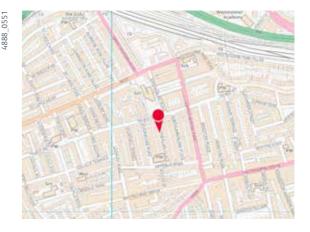


Existing









Existing

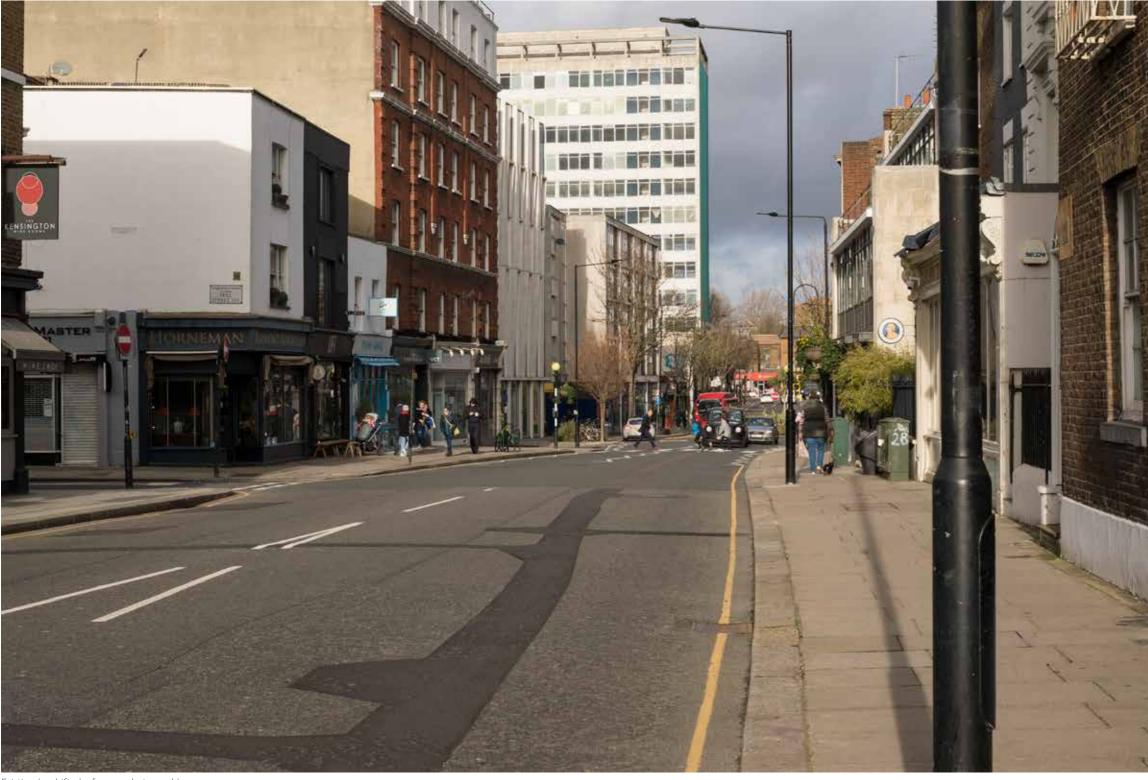


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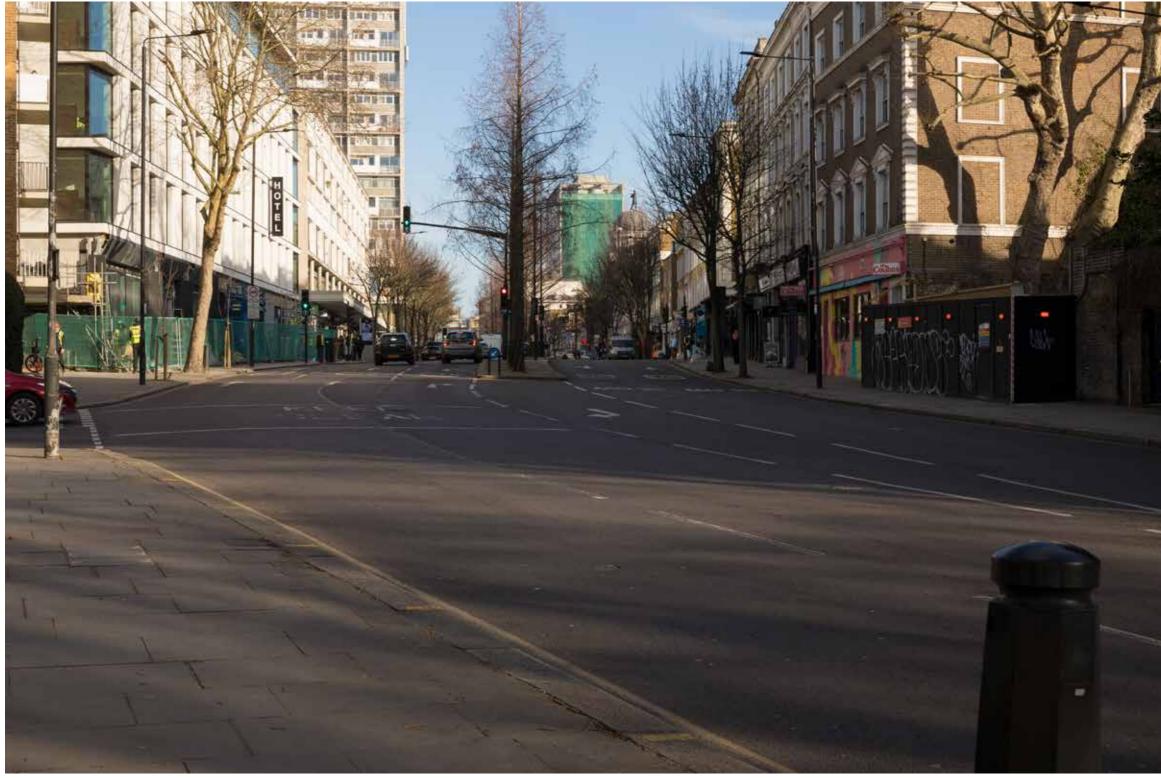
Appendix B

Unshifted baseline photography



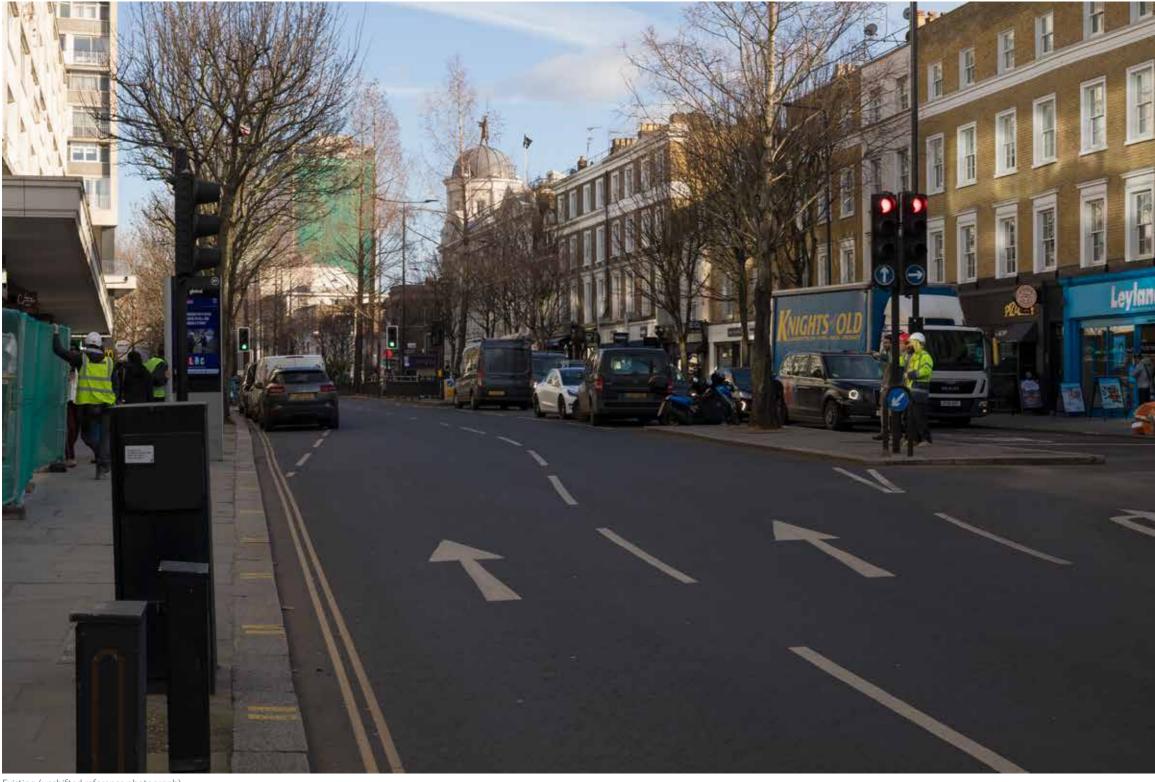


Existing (unshifted reference photograph)





Existing (unshifted reference photograph)





Existing (unshifted reference photograph)





Existing (unshifted reference photograph)





Existing (unshifted reference photograph)





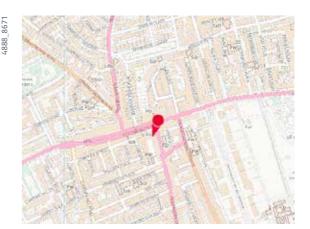
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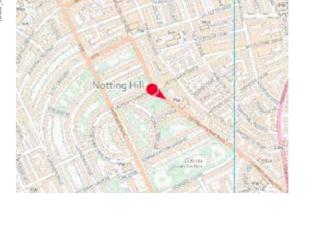
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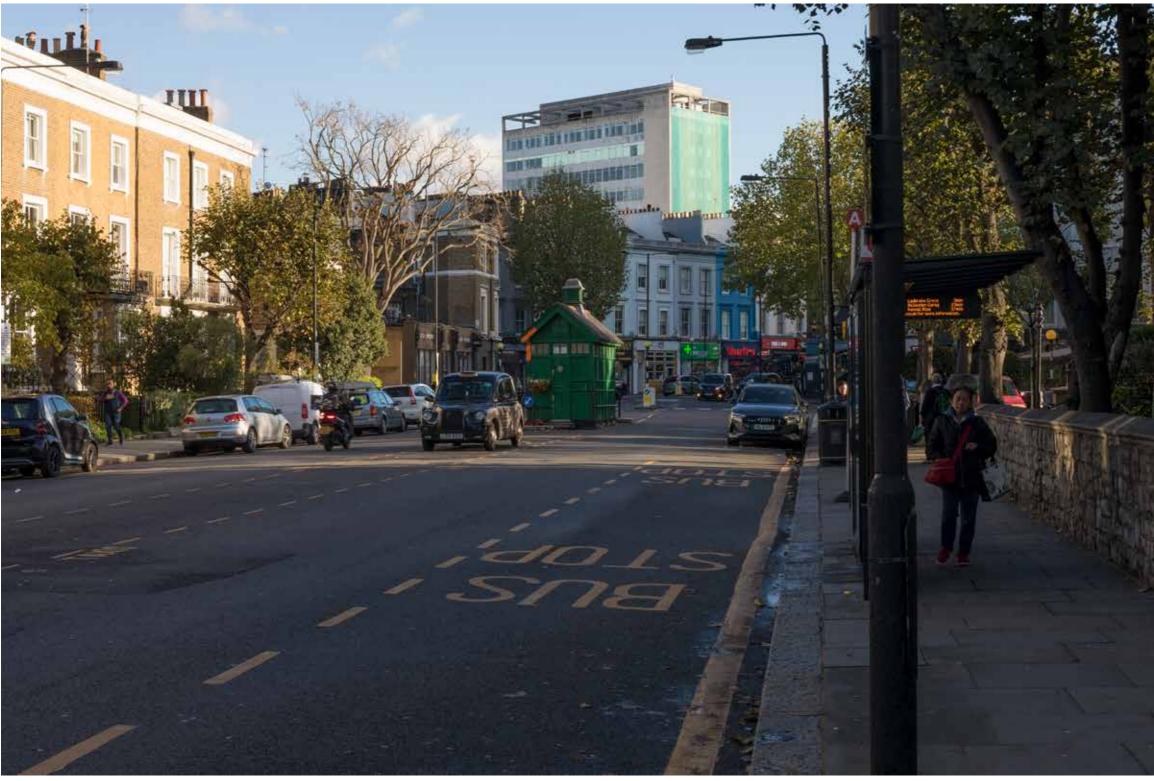


Existing (unshifted reference photograph)





Existing (unshifted reference photograph)





Existing (unshifted reference photograph)









Existing (unshifted reference photograph)





Existing (unshifted reference photograph)

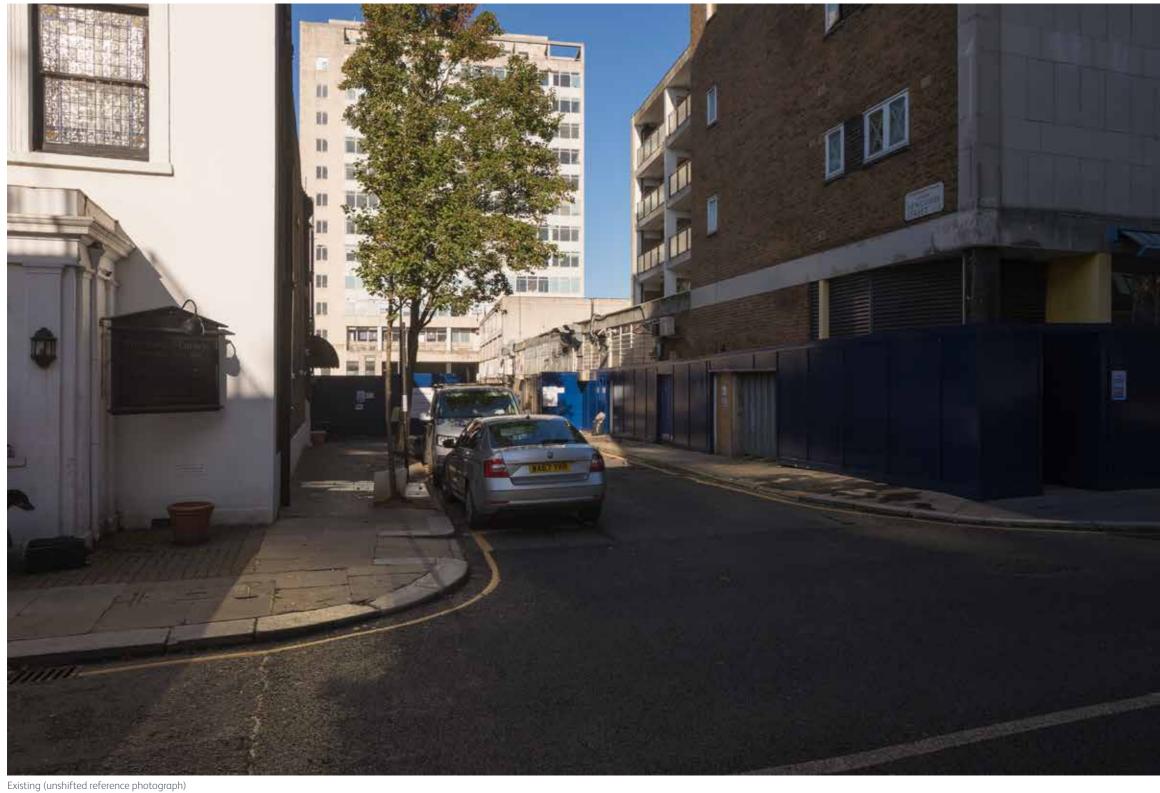


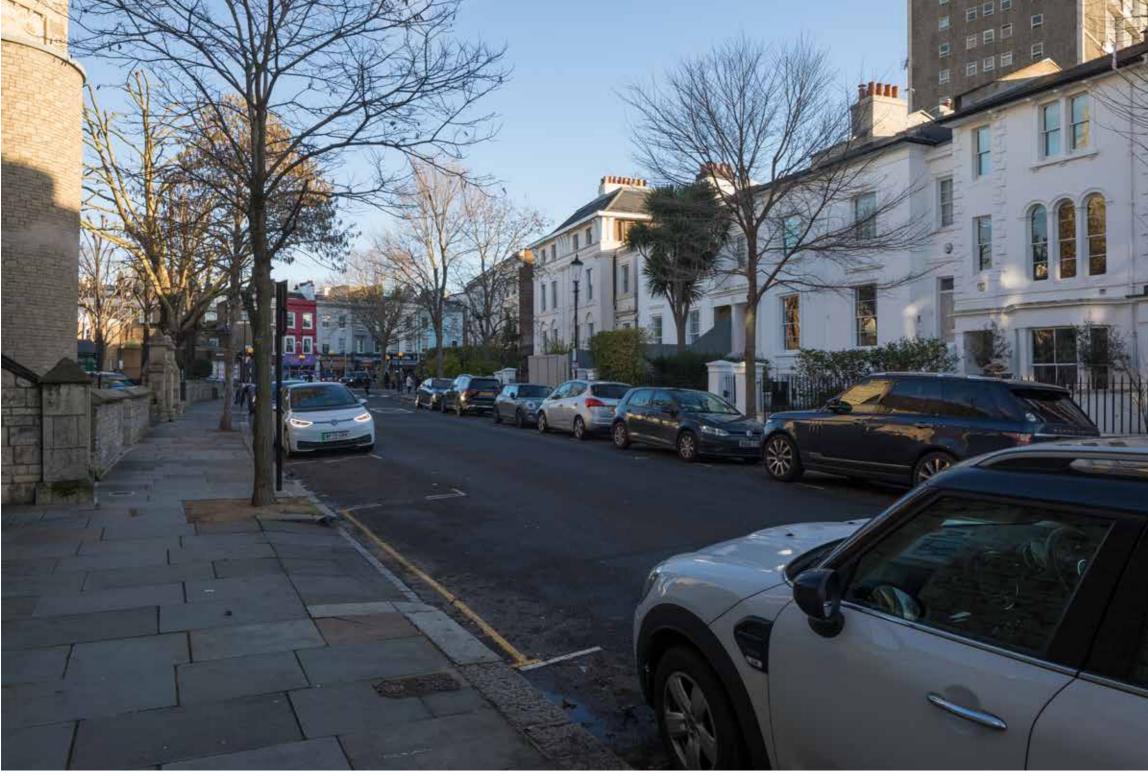


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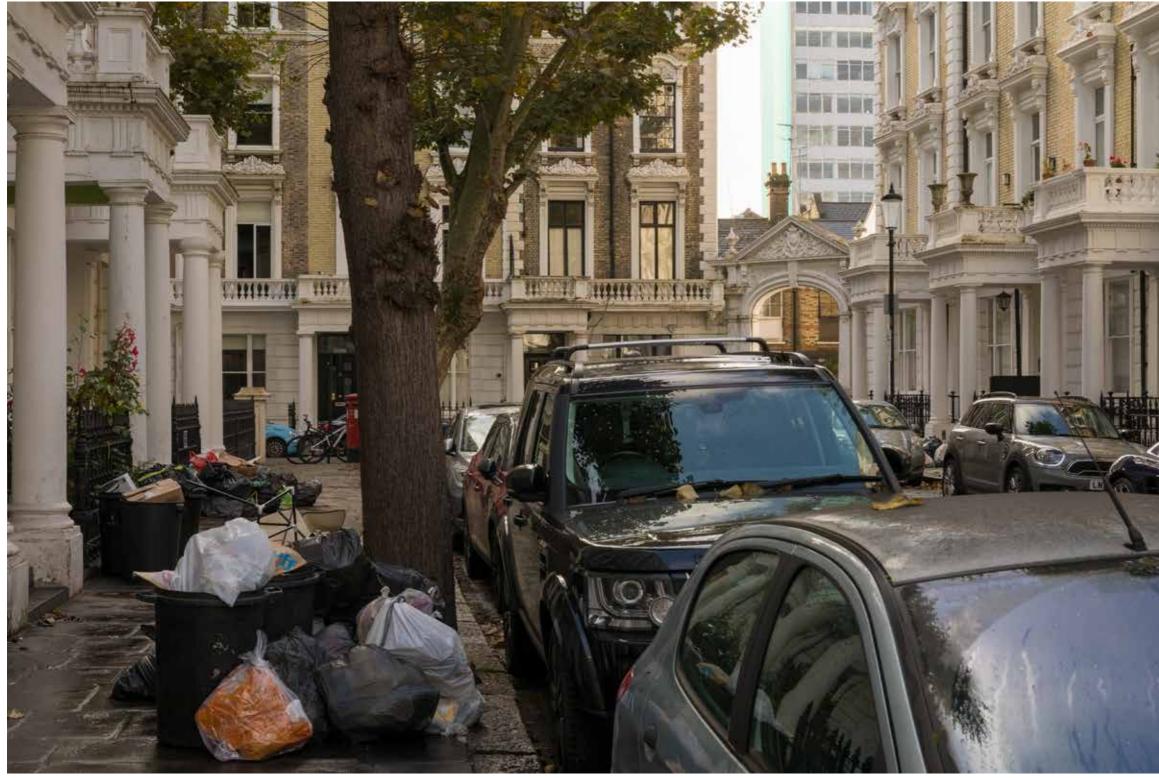
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Existing (unshifted reference photograph)





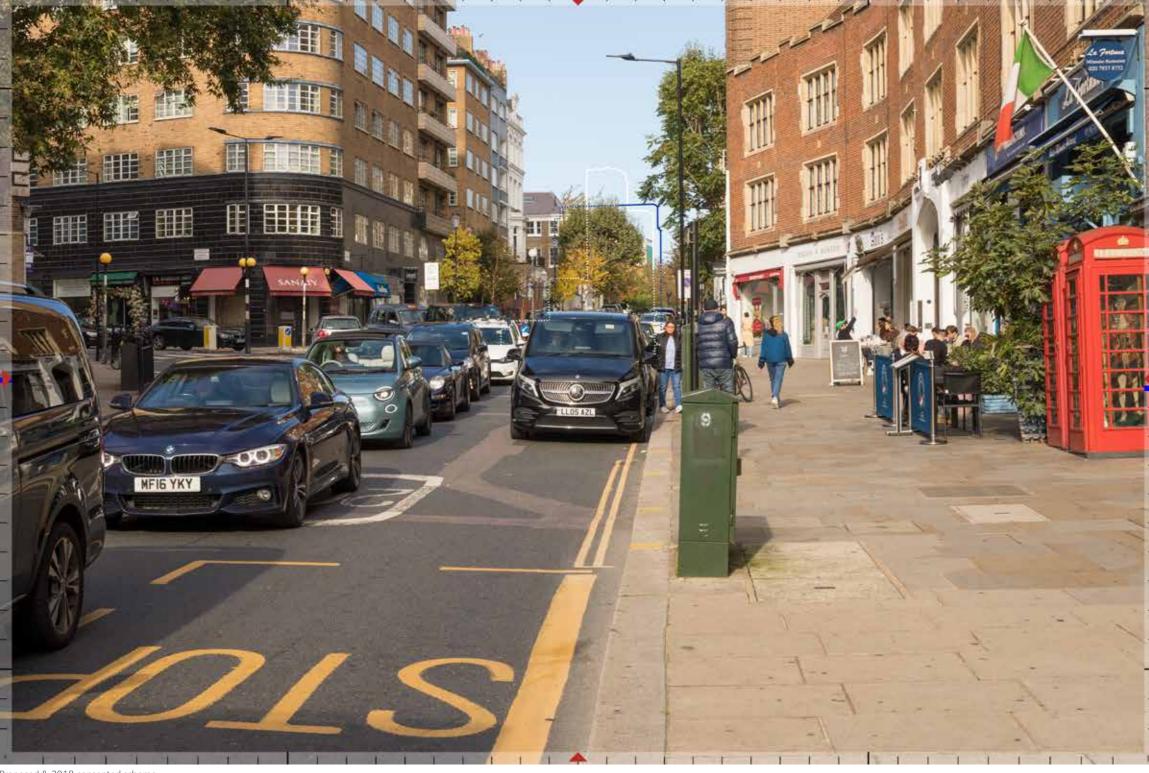
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Appendix C

c1 Comparison images with consented scheme

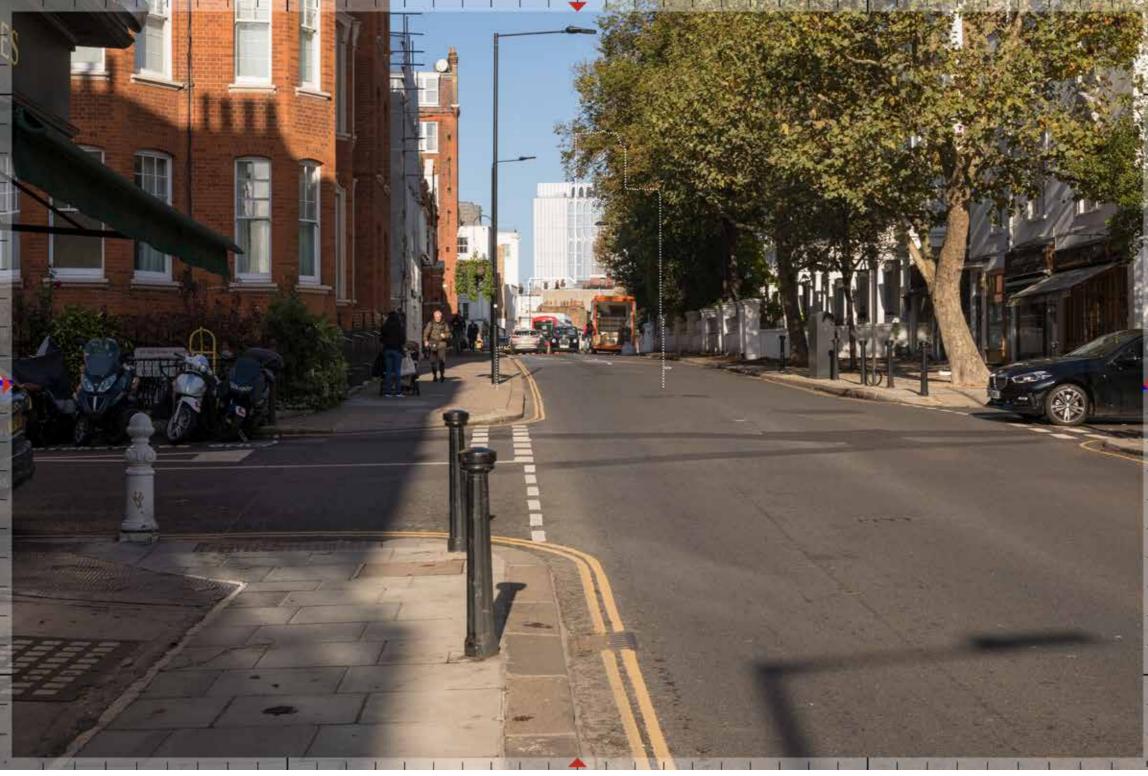
Introduction

A1.1 This following pages contain views which compare the consented scheme and the proposed scheme. In the views the consented scheme has been represented by a white wireline, the proposed scheme has been represented by $\boldsymbol{\alpha}$ blue wireline or a rendering.



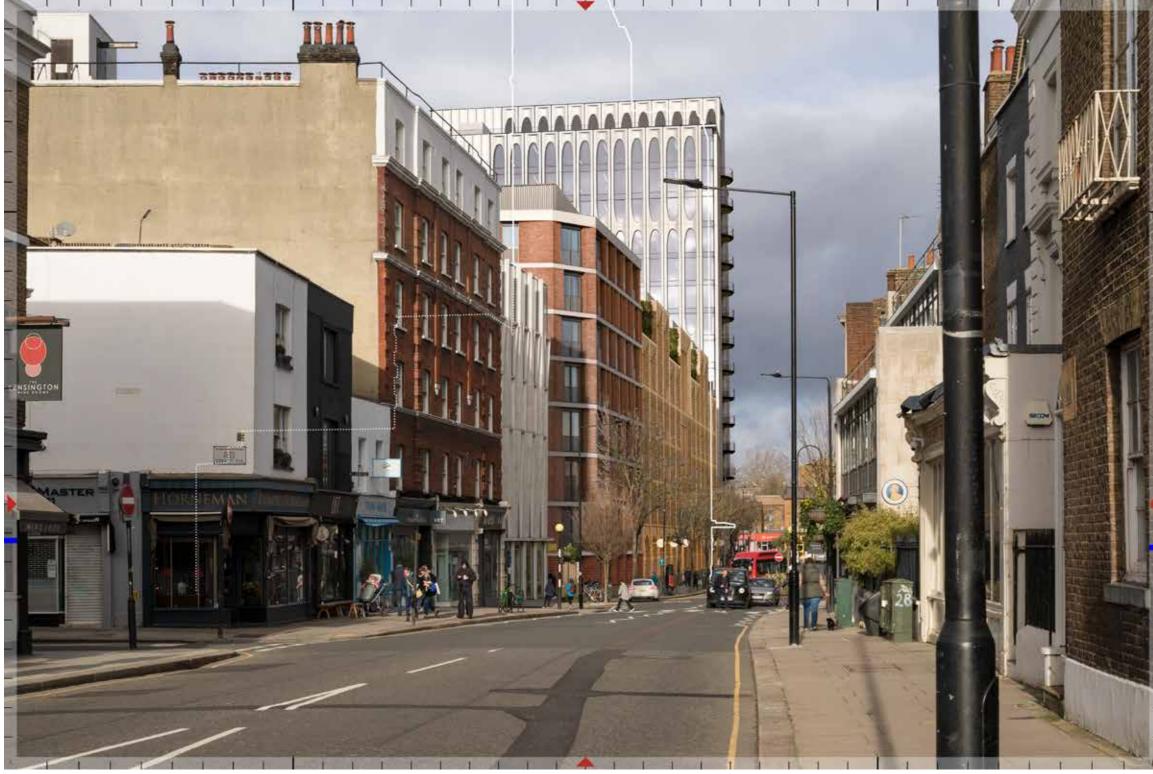


Proposed & 2018 consented scheme

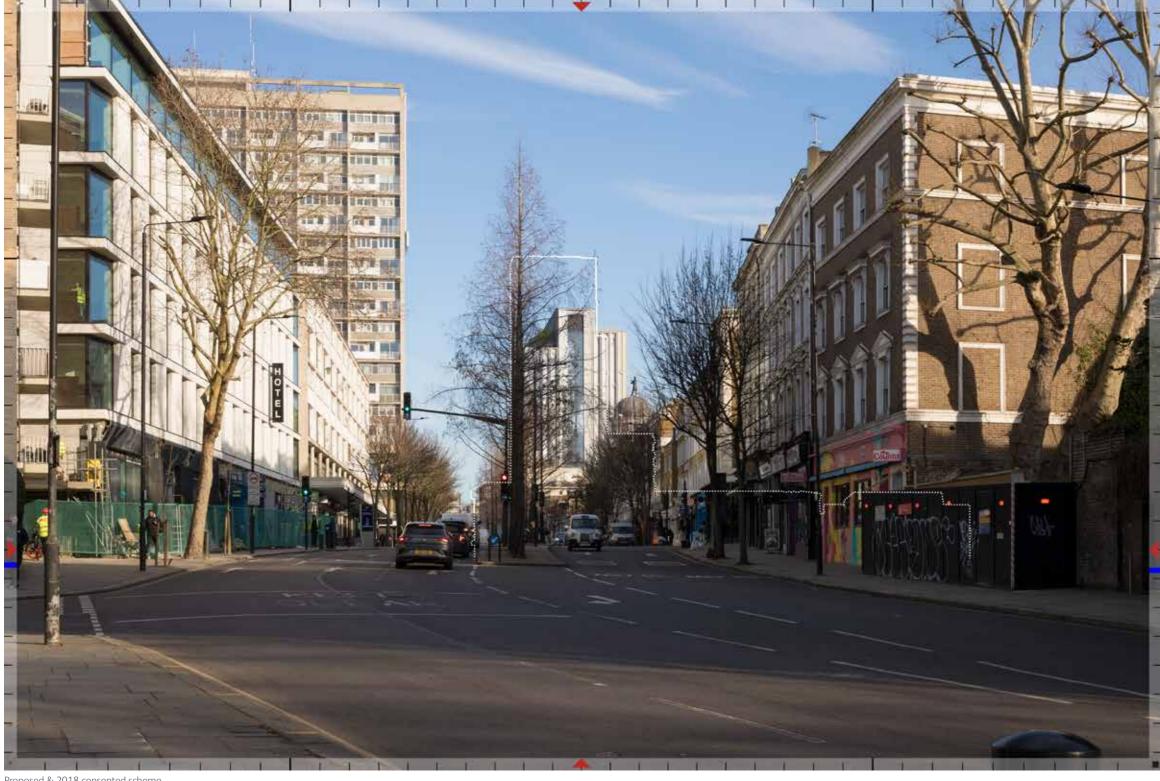


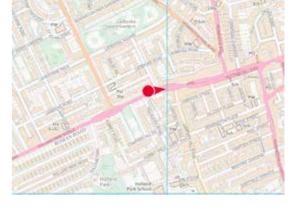


Proposed & 2018 consented scheme

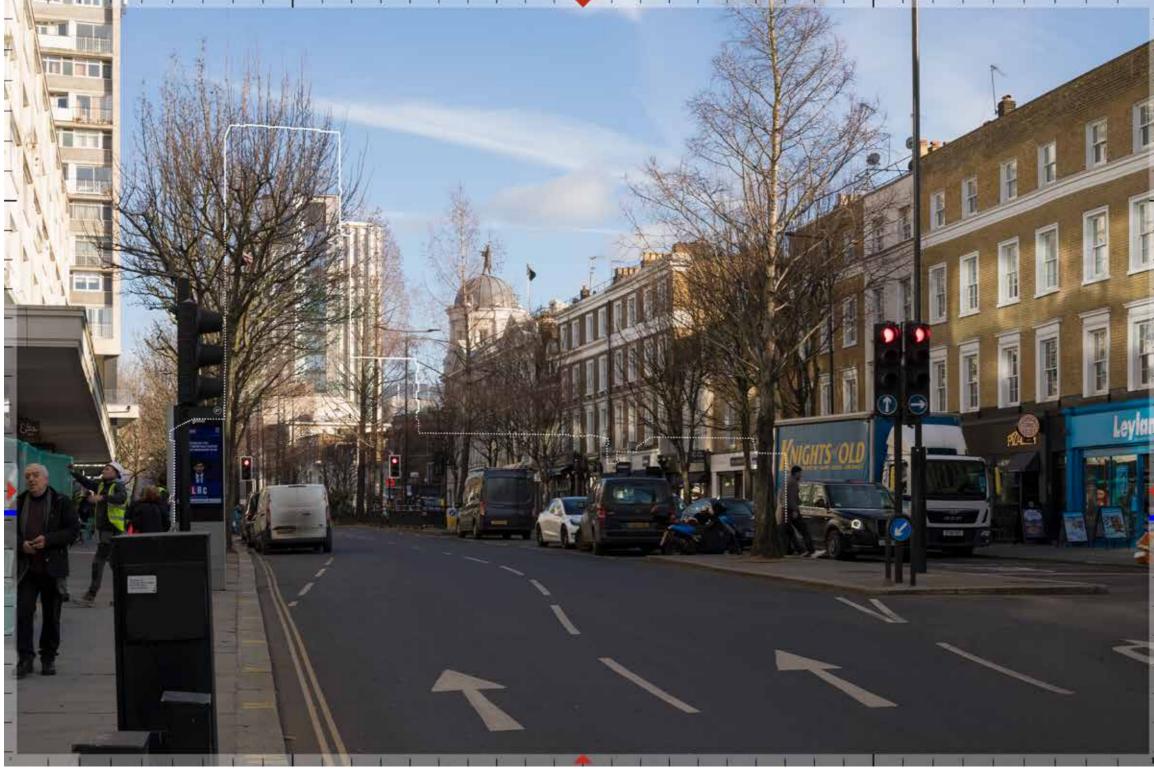




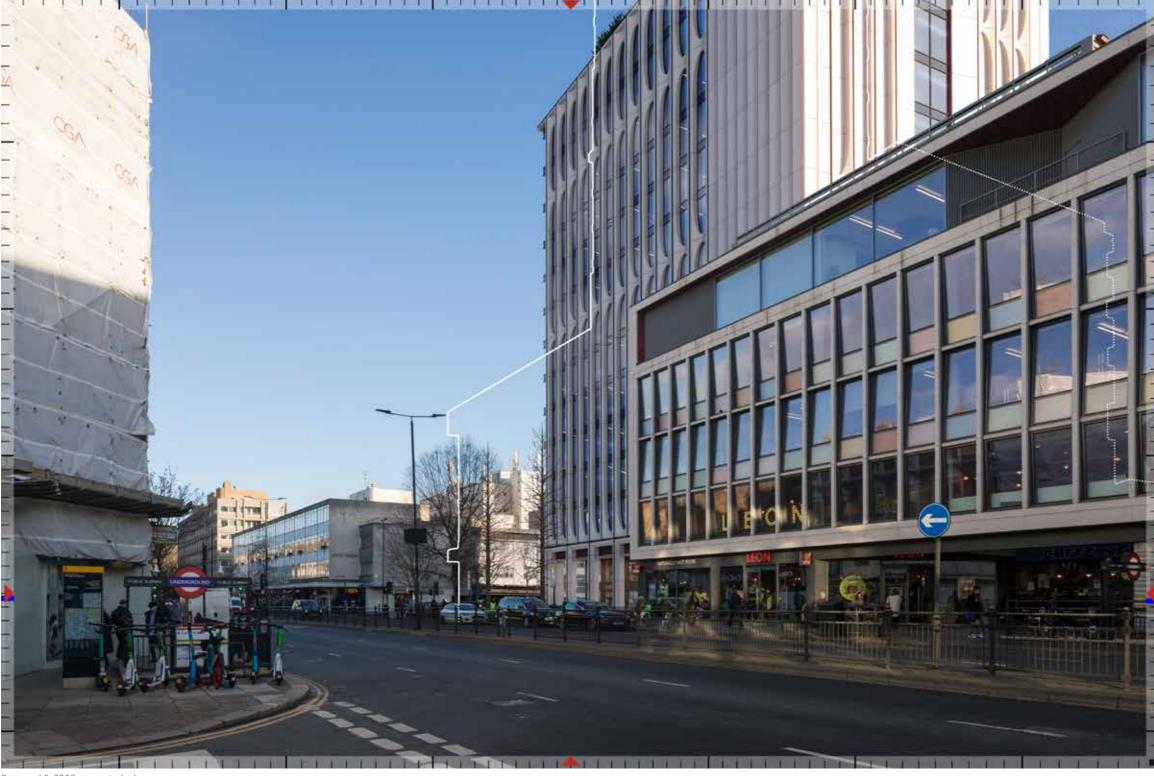


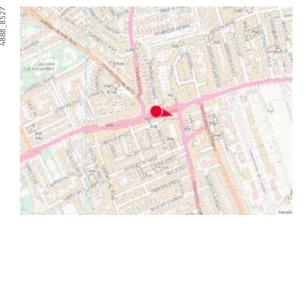


Proposed & 2018 consented scheme

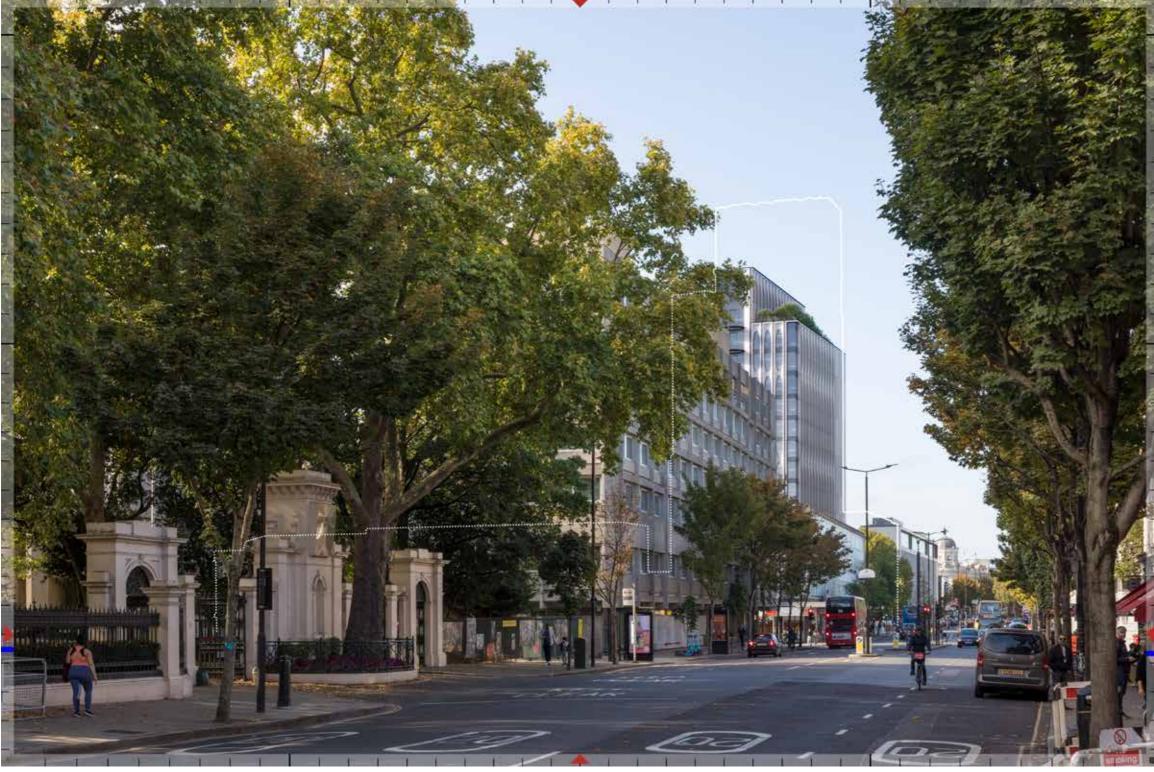








Proposed & 2018 consented scheme



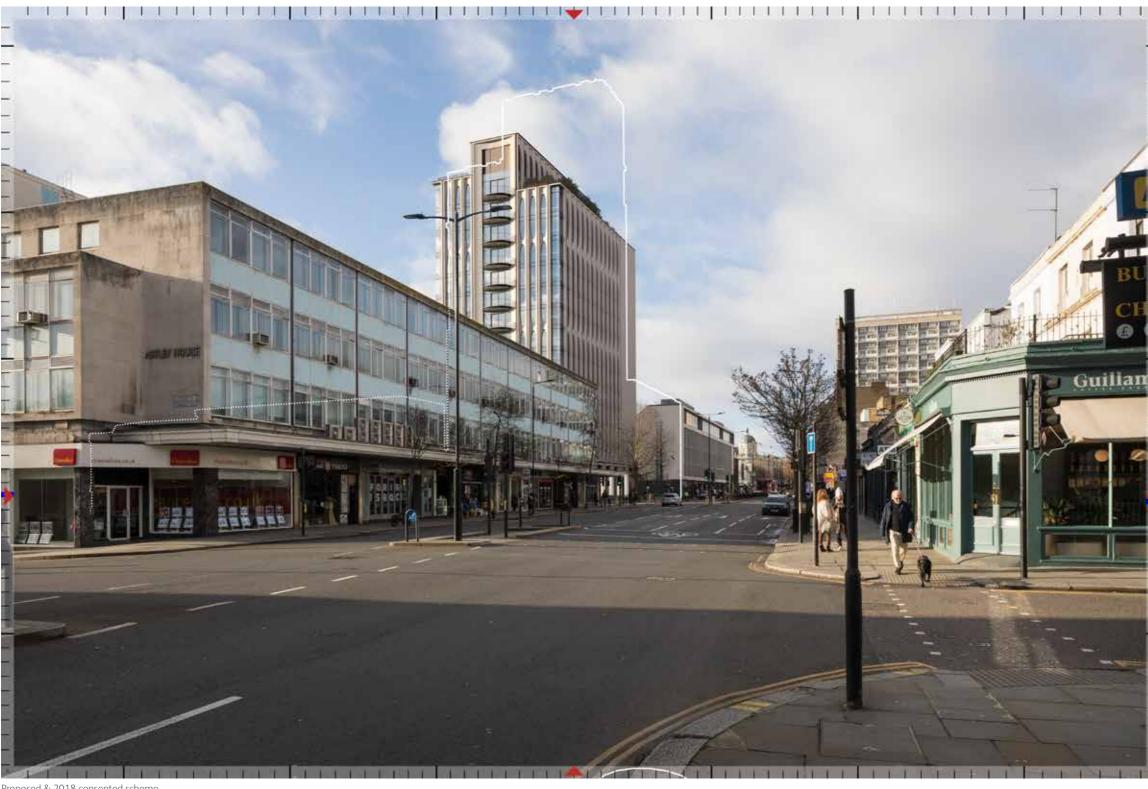


Proposed & 2018 consented scheme





Proposed & 2018 consented scheme



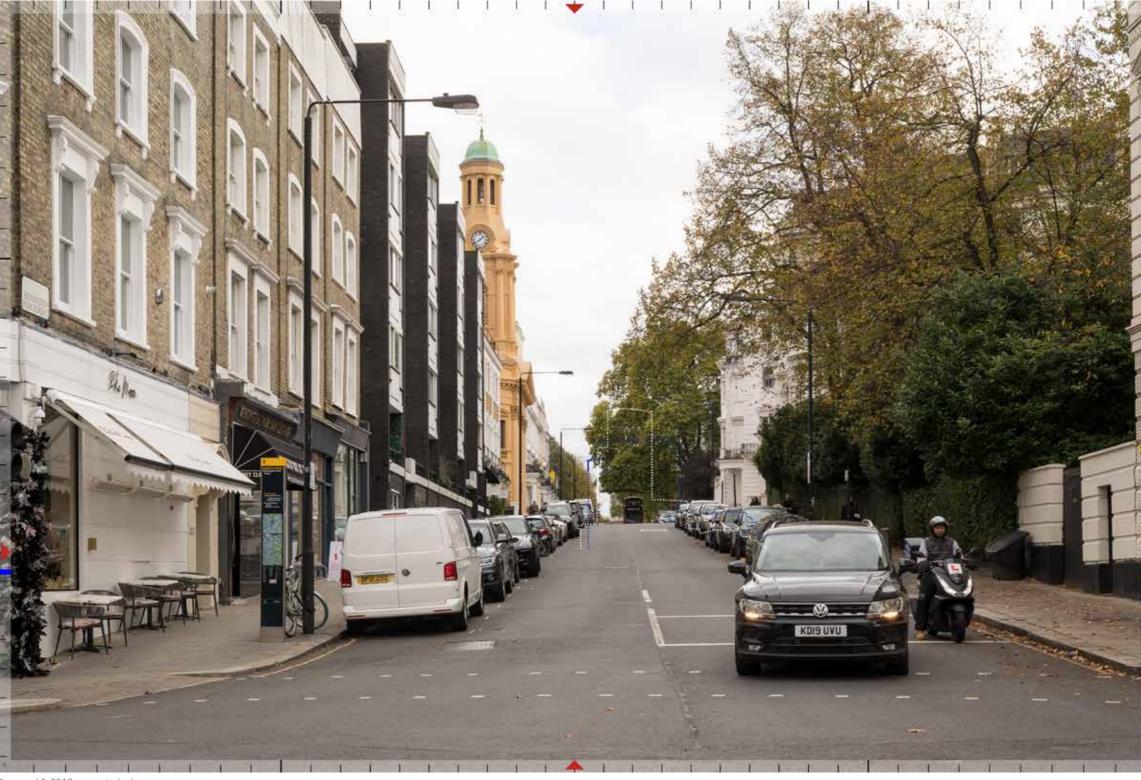


Proposed & 2018 consented scheme

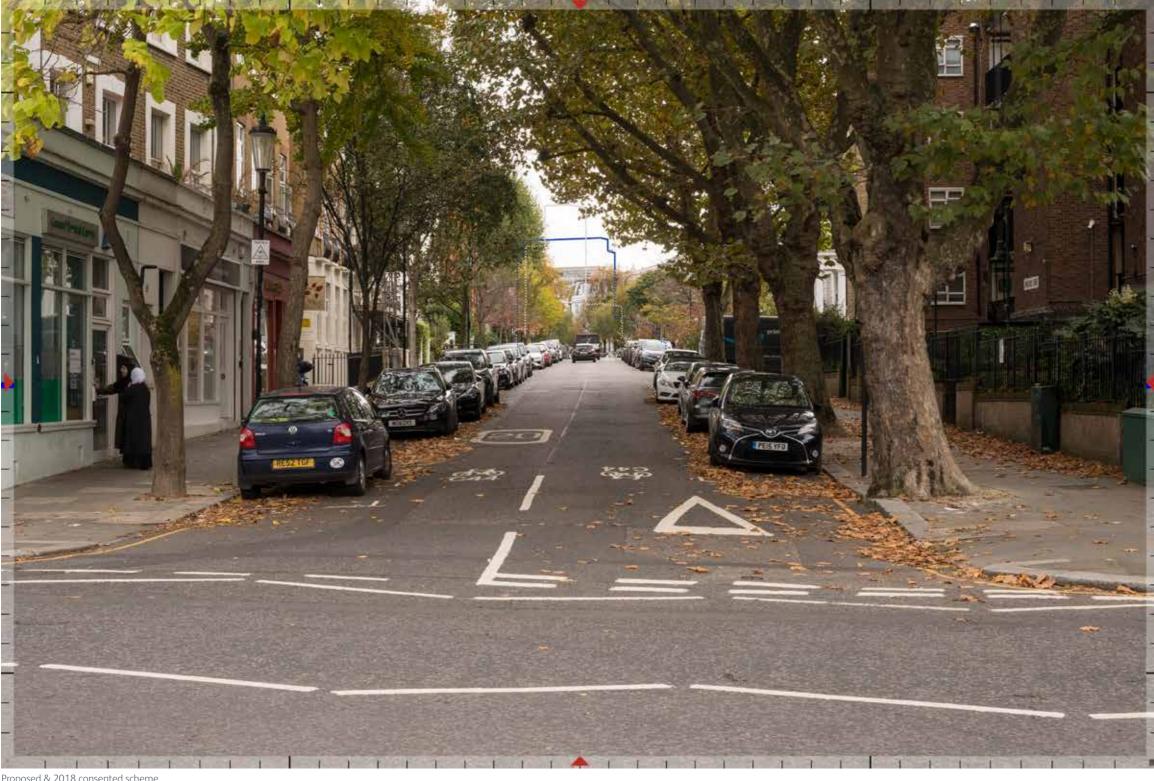


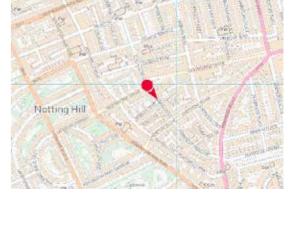


Proposed & 2018 consented scheme

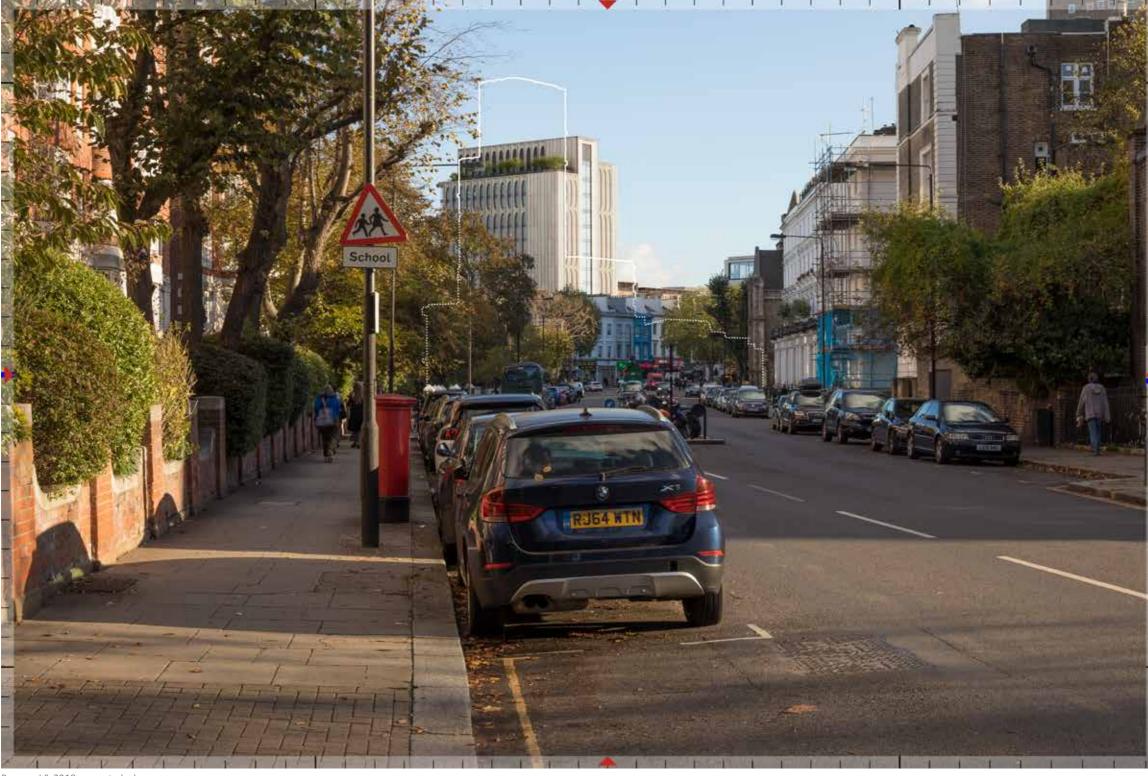


Proposed & 2018 consented scheme



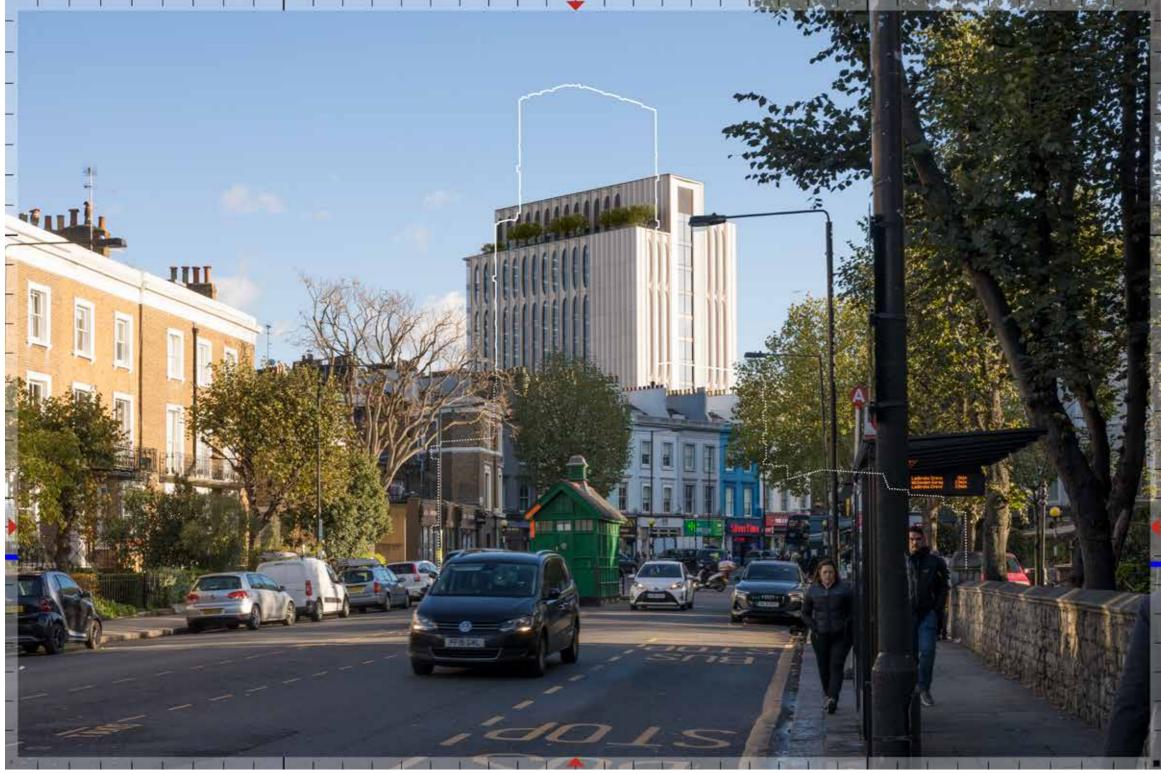


Proposed & 2018 consented scheme



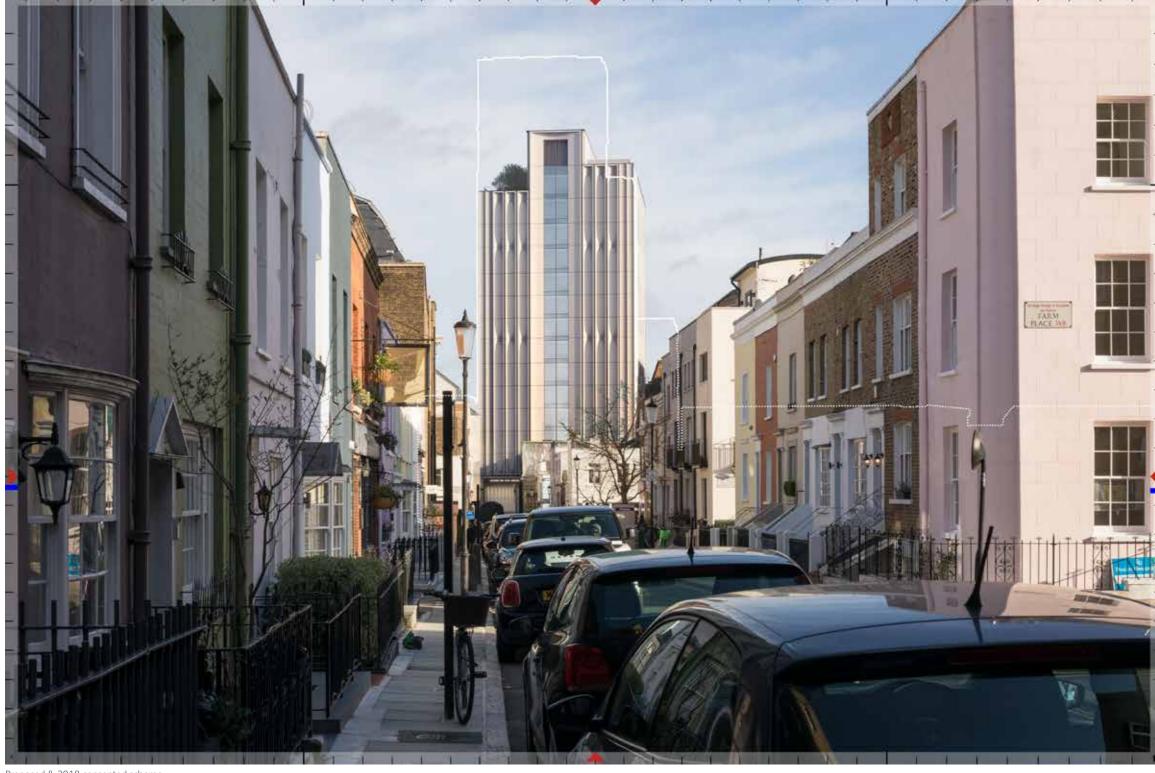


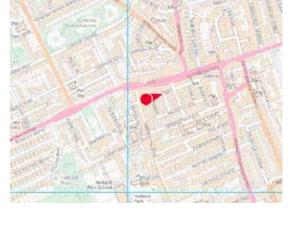
Proposed & 2018 consented scheme



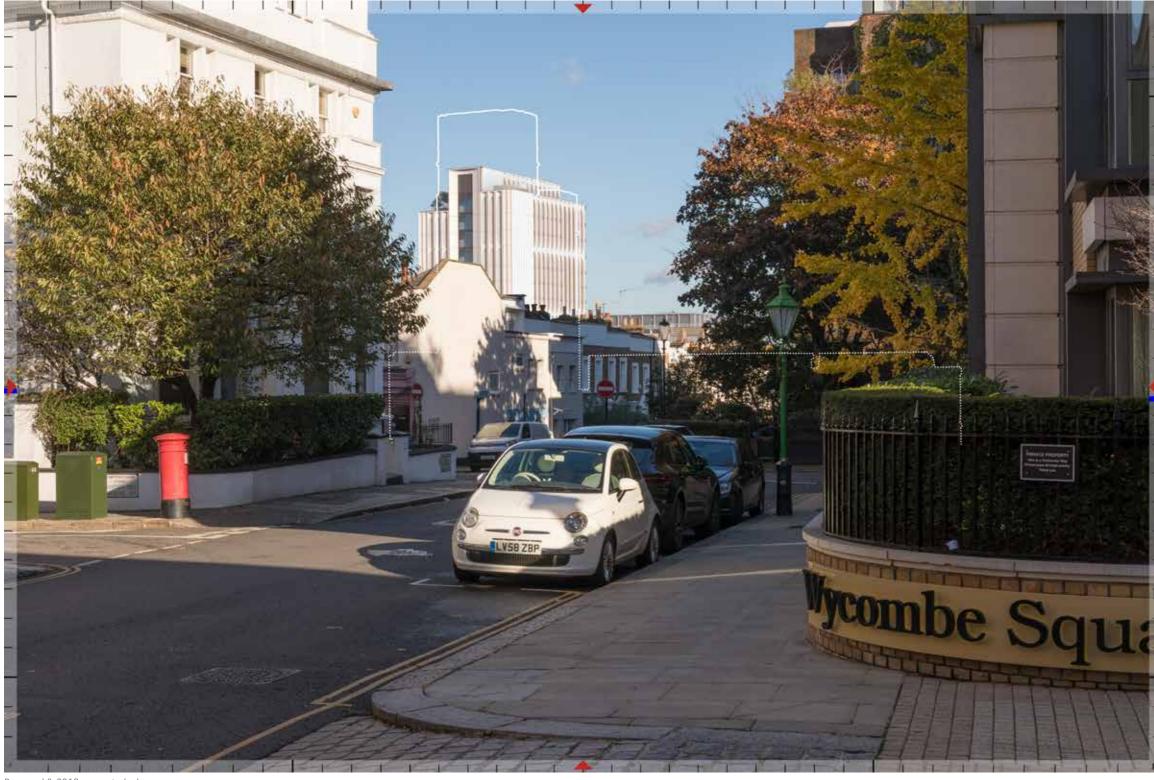


Proposed & 2018 consented scheme

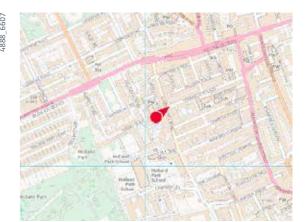


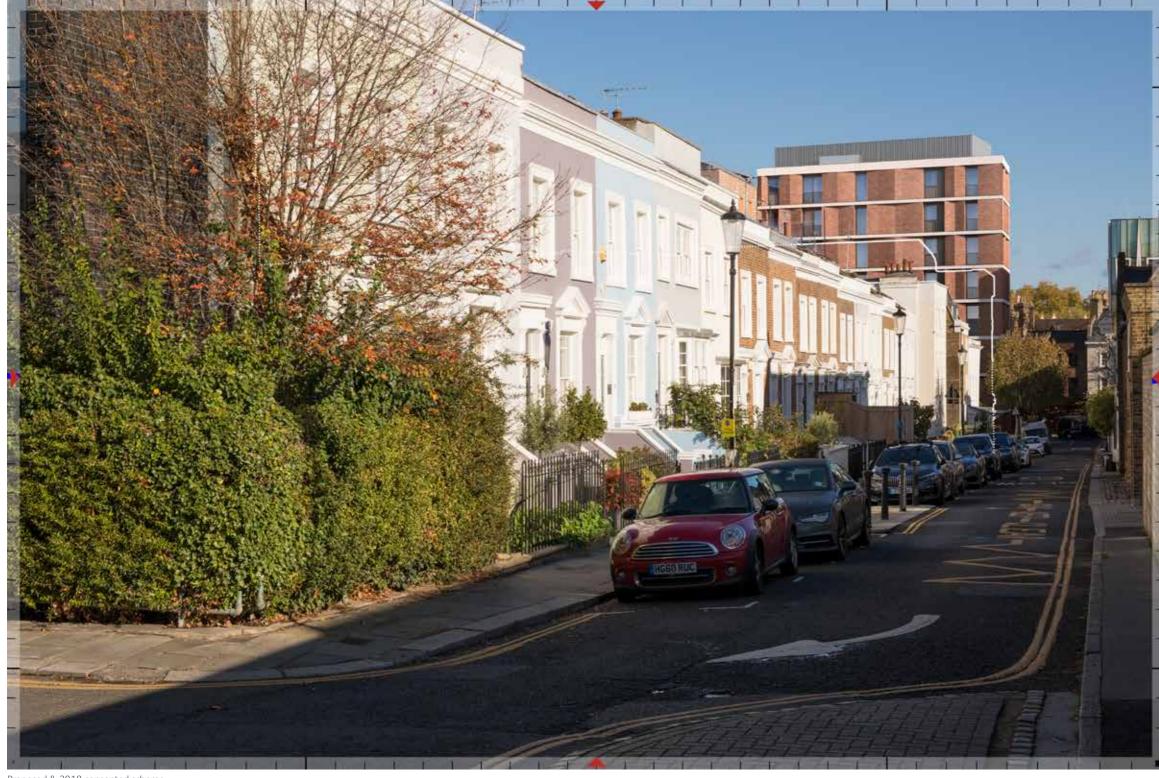


Proposed & 2018 consented scheme



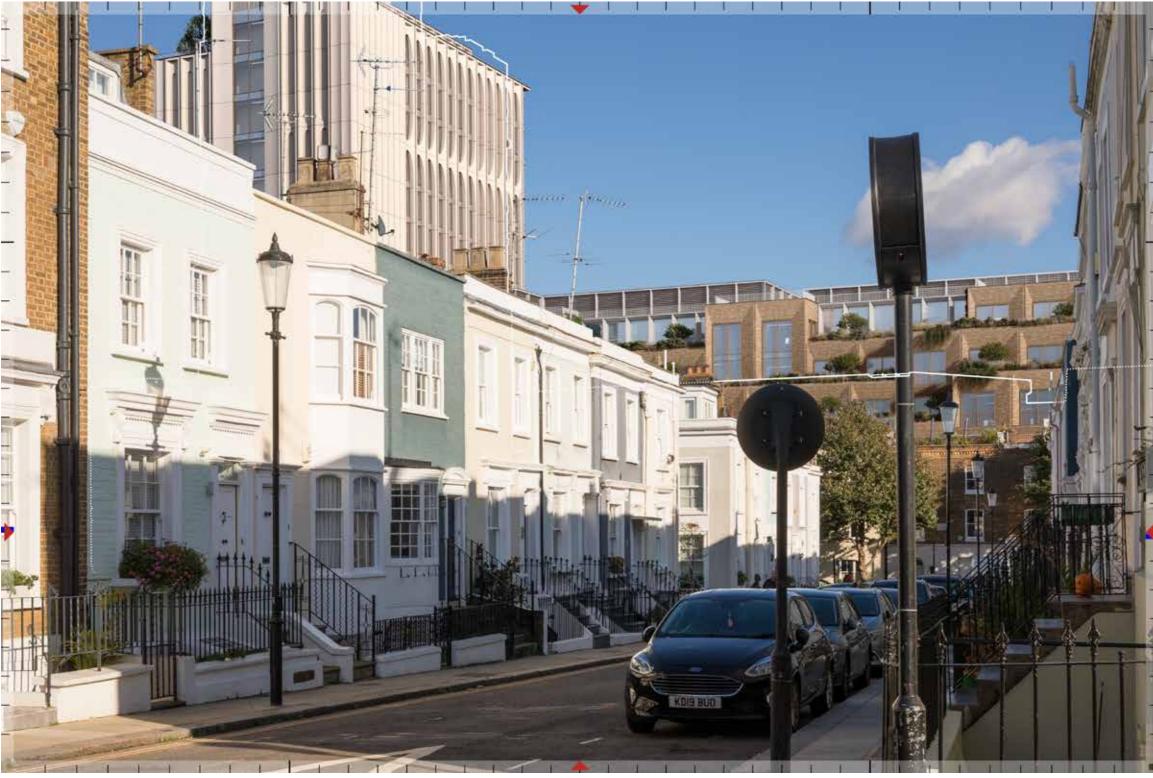






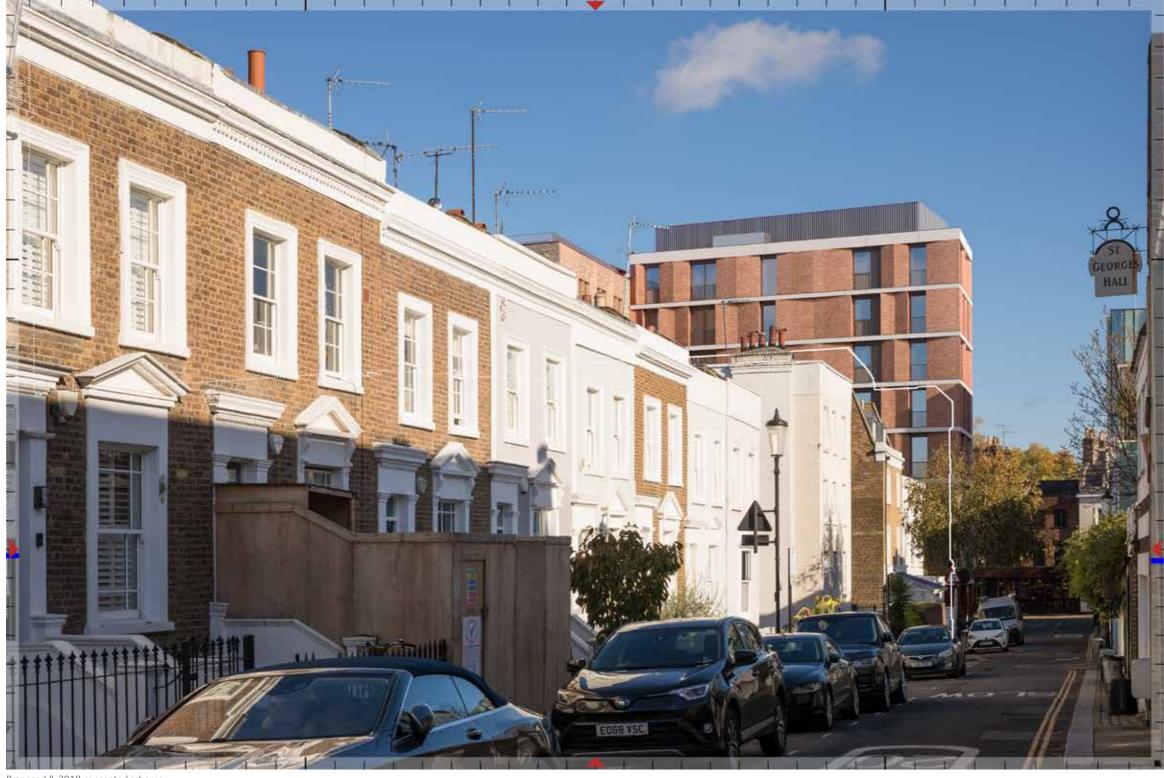


Proposed & 2018 consented scheme



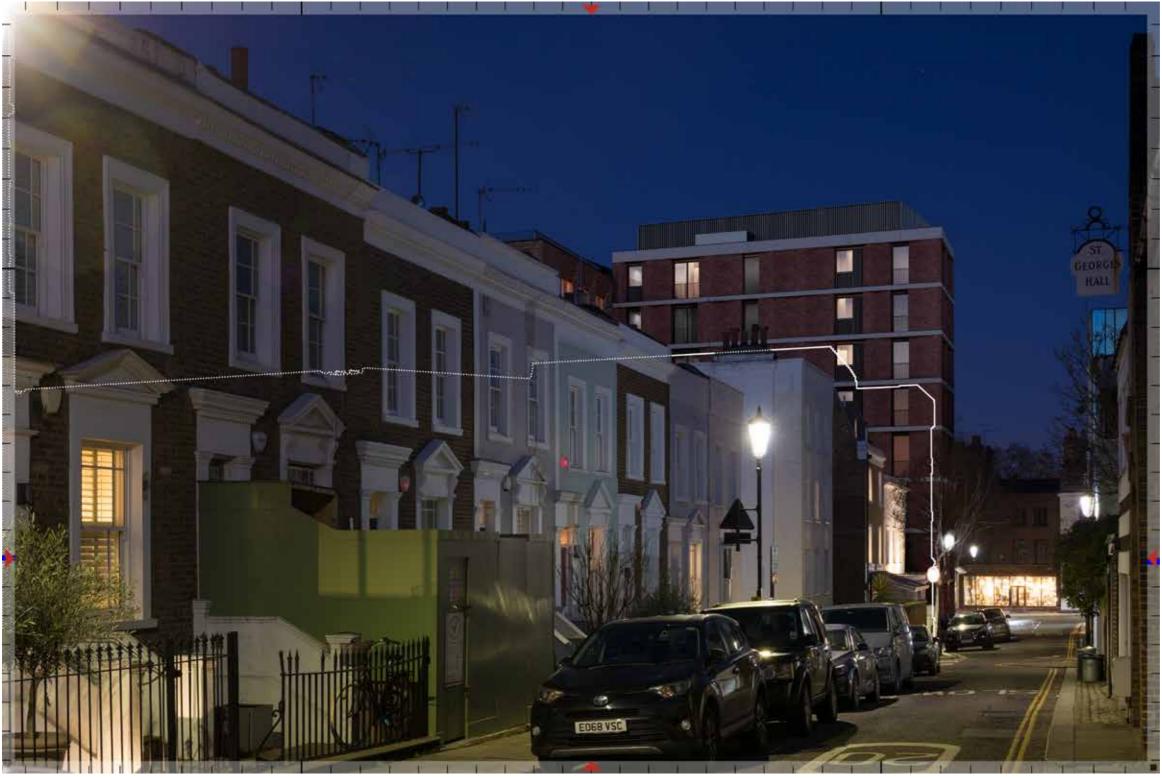


Proposed & 2018 consented scheme





Proposed & 2018 consented scheme





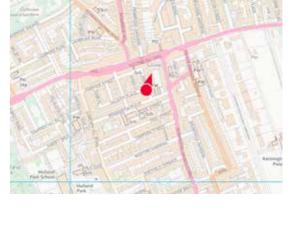
Proposed & 2018 consented scheme





Proposed & 2018 consented scheme



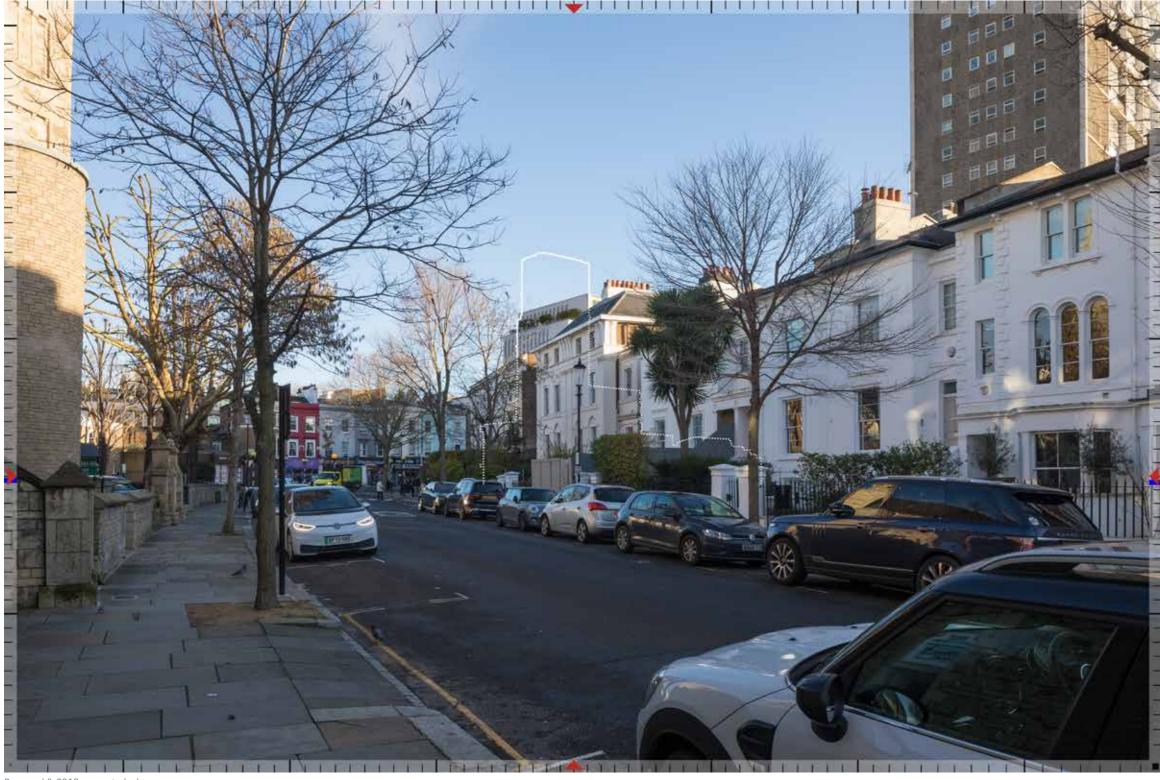


Proposed & 2018 consented scheme





Proposed & 2018 consented scheme

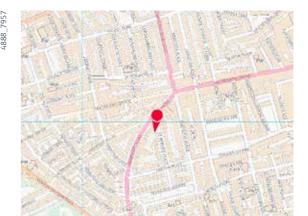


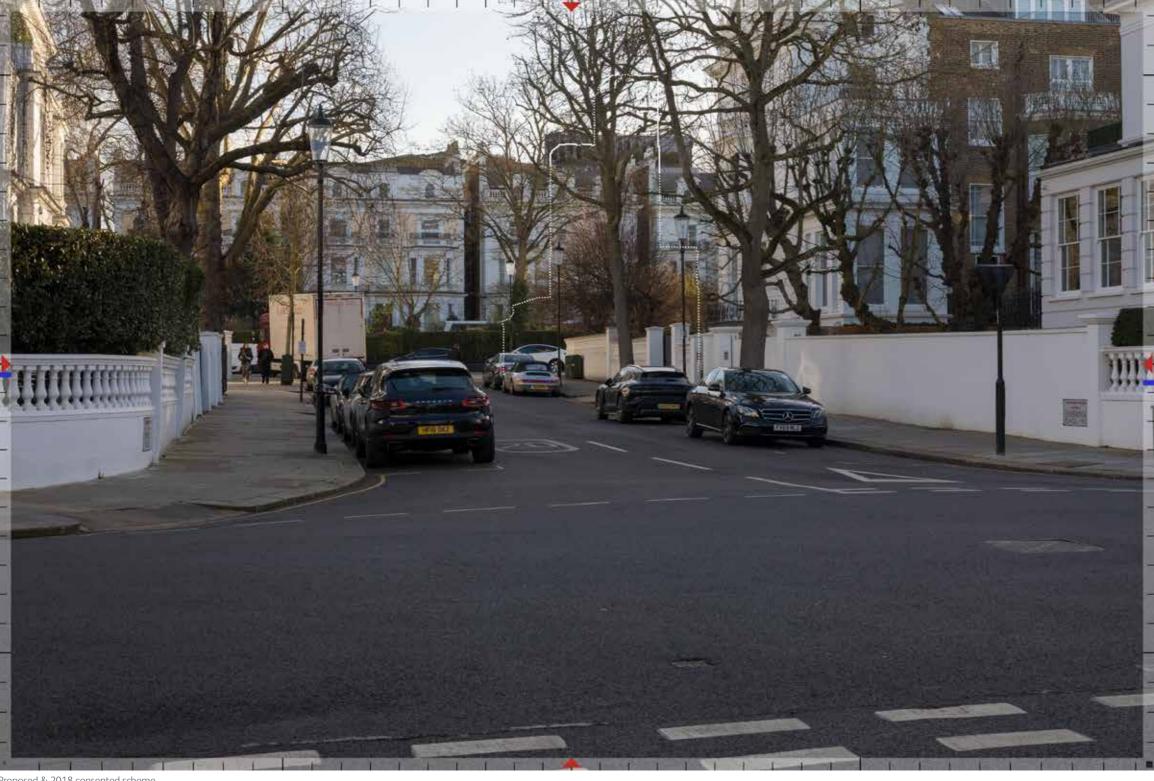


Proposed & 2018 consented scheme



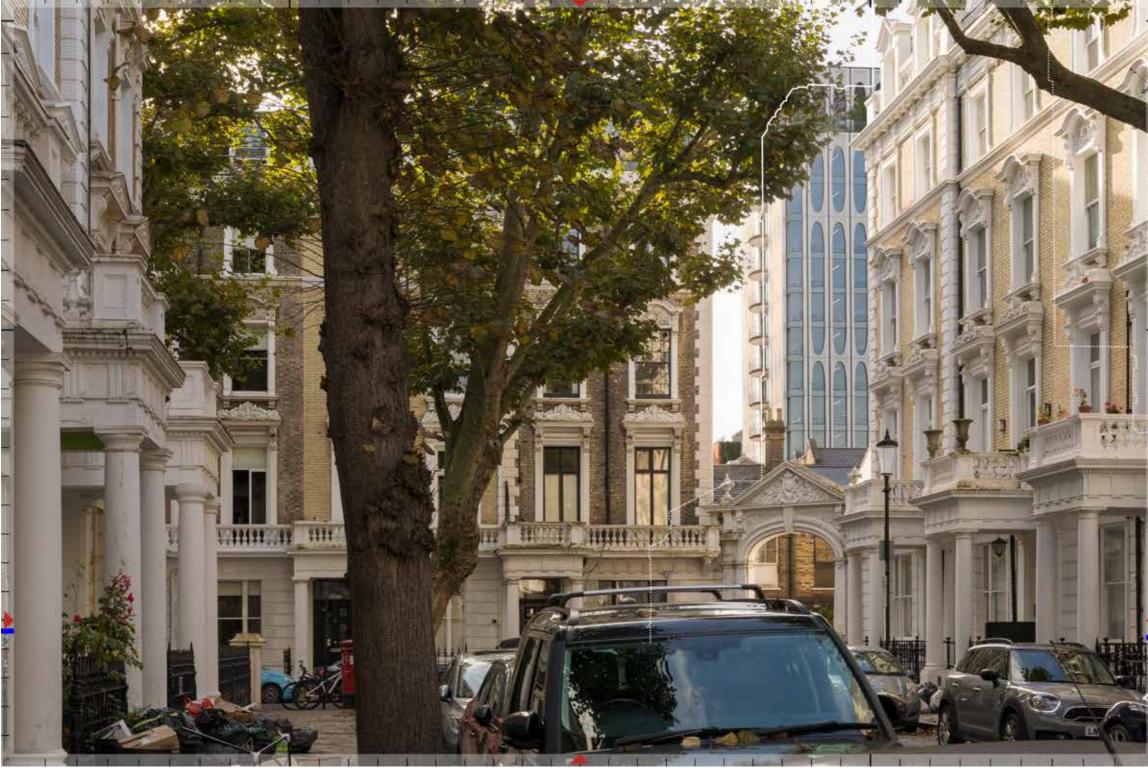














Proposed & 2018 consented scheme

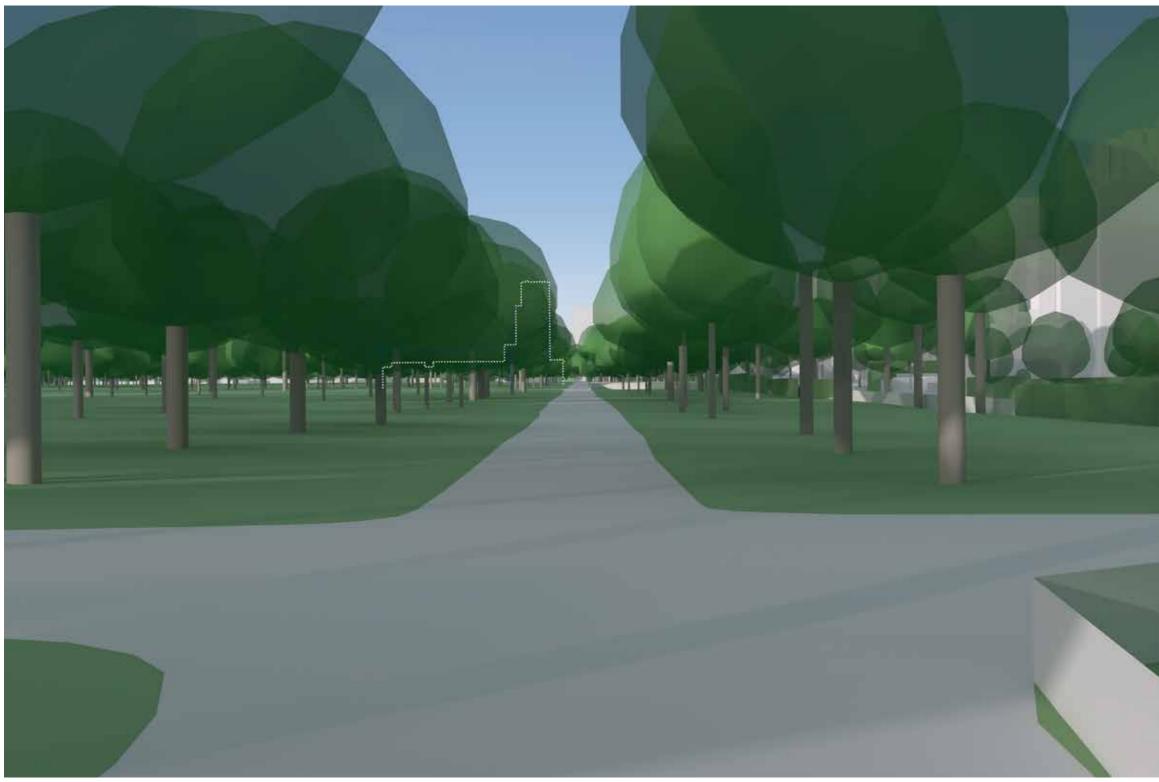








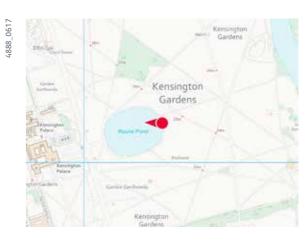
Proposed & 2018 consented scheme





Proposed & 2018 consented scheme





Proposed & 2018 consented scheme







Proposed & 2018 consented scheme



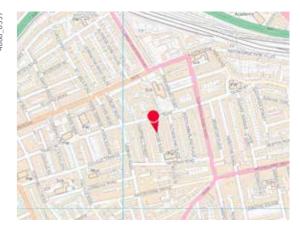


Proposed & 2018 consented scheme









Proposed & 2018 consented scheme









Proposed & 2018 consented scheme

Appendix D

on Miller Hare Verified Views Methodology

Scope

- D1.1 This study tests the visual impact of the Proposed Development by Beltane Asset Management at Newcombe House, Notting Hill Gate, London. It consists of a series of accurately prepared photomontage images or Accurate Visual Representations (AVR) which are designed to show the visibility and appearance of the Proposed Development from a range of publicly accessible locations around the site. The views have been prepared by Miller Hare Limited.
- D1.2 The views included in the study were selected by the project team and they include, where relevant, standard assessment points defined by the Mayor of London and the London borough of Kensington and Chelsea. Where requested, view locations have been refined and additional views added. The full list of views is shown in thumbnail form on the preceeding pages, together with a map showing their location. Detailed co-ordinates for the views, together with information about the source photography are shown in Appendix D1 "Technical notes on the Views".
- D1.3 In preparing each AVR a consistent methodology and approach to rendering has been followed. General notes on the AVRs are given in Appendix D5 "Accurate Visual Representations", and the detailed methodology used is described in Appendix D6 "Methodology for the production of Accurate Visual Representations".
- From each viewpoint a large format photograph has been taken as the basis of the study image. The composition of this photograph has been selected to allow the Proposed Development to be assessed in a meaningful way in relation to relevant elements of the surrounding context. Typically, photographs have been composed with a horizontal axis of view in order to allow vertical elements of the proposals to be shown vertically in the resulting image. If required in order to show the full extent of the proposals in an natural way the horizon line of the image has been allowed to fall above or below the centre of the image. This has been achieved by applying vertical rise at source using a large format camera or by subsequent cropping of the image. In a limited number of cases the source photograph has been extended vertically to ensure that the full height of the proposals are shown in the images of the future condition. In all cases the horizon line and location of the optical axis are clearly shown by red arrow markers at the edges of the image.
- D1.5 The lenses chosen for the source photography have been selected to provide a useful Field of View given the distance of the viewpoint from the site location. The lenses used for each view are listed in Appendix D2 "View Locations".
- D1.6 In this study the following groups of views have been defined:

- **Distant views** typically with a horizontal Field of View approximately 48 degrees (equivalent to a 35mm lens on 35mm film camera). LVMF views in addition have been shown with their wider setting
- Mid-distance views horizontal Field of View approximately 74 degrees (equivalent to a 24mm lens on 35mm film camera)
- Local views horizontal Field of View approximately 74 degrees (equivalent to a 24mm lens on 35mm film camera)
- D1.7 For each AVR image, the precise Field of View, after any cropping or extension has been applied is shown clearly using indexed markings running around the edges of the image. These indicate increments of 1, 5 and 10 degrees marked away from Optical Axis. Using this peripheral annotation it is possible to detect optical distortions in parts of the image away from the Optical Axis . It is also possible to simulate a different field of view by masking off an appropriate area of the image. More detailed information on the border annotation is contained in Appendix D5 "Accurate Visual Representations".

Conditions

- D1.8 From each selected viewpoint a set of accurate images have been created comparing the future view with the current conditions represented by a carefully taken large format photograph. In this study the following conditions are compared:
 - Existing the appearance today as recorded on the specified date and time
 - Proposed the future appearance were the Proposed Development to be constructed
 - **Cumulative** the Proposed Development is shown in the context of other significant schemes considered relevant by the project team

Styles

- D1.9 For each viewpoint, the Proposed Development is shown in a defined graphical style. These styles comply with the definitions of AVR style defined by the London View Management Framework. The styles used in this study are:
 - AVR 1 a wireline representation showing the silhouette
 of the proposals. Where a part of the silhouette would be
 visible in the view it is shown in blue, where it would be
 invisible, as a result of being occluded by existing structures or dense vegetation, it is shown dotted.

- **AVR 2** a simple white rendered representation showing the silhouette and architectural form of the proposals.
- AVR 3 a fully rendered representation of the building showing the likely appearance of the proposed materials under the lighting conditions obtaining in the selected photograph.

Schemes

- D1.10 In the Cumulative view, the Proposed Development has been shown in the context of other schemes shown in silhouette form (AVR 1) using an orange line. Where parts of these schemes would not be visible they are shown as a dotted line. The details of the additional schemes included in the Cumulative view are given in the schedule and overview map included in Appendix D3 "Details of schemes", these include:
 - 15-35 Notting Hill Gate
 - 66-74 Notting Hill Gate
 - 146-164 Notting Hill Gate
- D1.11 The Proposed Development shown in the study has been defined by drawings and specifications prepared by the client's design team issued to Millerhare in May 2023. Computer models reflecting the Proposed Development have been assembled and refined by Millerhare and images from these models have been supplied to the project team to be checked for accuracy against the design intent. An overview of the study model annotated with key heights is illustrated in Appendix D3 "Details of schemes".

View Locations

1 | Kensington Church Street - south Of Dukes







Camera Location National Grid Reference 525591.9E 179854.8N Camera height 21.45m AOD Looking at Centre of Site Bearing 333.1°, distance 0.6km Photography Details Height of camera 1.60m above ground Date of photograph 16/10/2022 Time of photograph 12:02 Canon EOS 5D Mark IV DSLR Lens 50mm

2 | Kensington Church Street - south Of Gloucester Walk | Spring







National Grid Reference 525457.7E 179971.1N Camera height 27.63m AOD Looking at Centre of Site Bearing 341.8°, distance 0.5km Photography Details Height of camera 1.60m above ground Date of photograph 04/11/2022 Time of photograph 10:46 Canon EOS 5D Mark IV DSLR Lens 50mm

3 | Kensington Church Street/ south of Kensington Mall/ Peel Street







Camera Location National Grid Reference 525394.8E 180226.6N Camera height 30.01m AOD Looking at Centre of Site Bearing 338.6°, distance 0.2km Photography Details Height of camera 1.60m above ground Date of photograph 15/01/2023 Time of photograph 11:25 Canon EOS 5D Mark IV DSLR Lens 50mm

4 | Holland Park Avenue - west Of Ladbroke Terrace | Winter







Camera Location National Grid Reference 524930.2E 180376.3N Camera height 27.08m AOD Looking at Centre of Site Bearing 83.5°, distance 0.4km Photography Details Height of camera 1.60m above ground Date of photograph 30/01/2023 Time of photograph 14:10 Canon EOS 5D Mark IV DSLR Lens 50mm

5 | Notting Hill Gate - Opposite Junction With Campden Hill Road | Spring







Camera Location National Grid Reference 525011.7E 180399.3N Camera height 29.63m AOD Looking at Centre of Site Bearing 95.2°, distance 0.3km Photography Details Height of camera 1.60m above ground Date of photograph 30/01/2023 Time of photograph 14:20 Canon EOS 5D Mark IV DSLR Lens 50mm

6 | Notting Hill Gate - Corner With Pembridge







Camera Location National Grid Reference 525256.1E 180455.9N Camera height 29.22m AOD Looking at Centre of Site Bearing 104.9°, distance 0.1km Photography Details Height of camera 1.60m above ground Date of photograph 19/01/2023 Time of photograph 14:42 Canon EOS 5D Mark IV DSLR Lens 24mm

7 | Bayswater Road - Junction With Ossington









Camera Location National Grid Reference 525568.2E 180554.5N Camera height 29.89m AOD Looking at Centre of Site Bearing 236.3°, distance 0.3km Photography Details Height of camera 1.60m above ground Date of photograph 16/10/2022 Time of photograph 11:15 Canon EOS 5D Mark IV DSLR Lens 50mm

7N | Bayswater Road - Junction With Ossington Street | DUSK

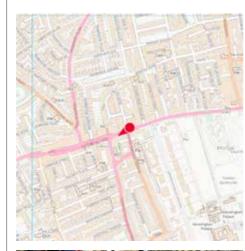






National Grid Reference 525568.3E 180554.6N Camera height 29.84m AOD Looking at Centre of Site Bearing 236.9°, distance 0.3km Photography Details Height of camera 1.60m above ground Date of photograph 19/01/2023 Time of photograph 17:28 Canon EOS 5D Mark IV DSLR Lens 50mm

8 | Notting Hill Gate - By Junction With Linden







National Grid Reference 525429.1E 180509.6N Camera height 28.75m AOD Looking at Centre of Site Bearing 234.7°, distance 0.1km Photography Details Height of camera 1.60m above ground Date of photograph 15/01/2023 Time of photograph 10:23 Canon EOS 5D Mark IV DSLR Lens 24mm

9 | Notting Hill Gate - Looking south Along **Kensington Church Street**







Camera Location National Grid Reference 525344.2E 180480.2N Camera height 29.03m AOD Looking at Centre of Site Bearing 198.9°, distance 0.1km Photography Details Height of camera 1.60m above ground Date of photograph 16/10/2022 Time of photograph 10:49 Canon EOS 5D Mark IV DSLR Lens 24mm

10 | Westbourne Grove - Junction With Ladbroke Gardens | Winter

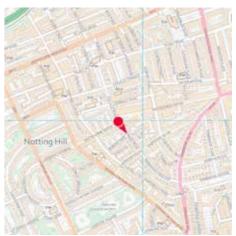






Camera Location National Grid Reference 524697.5E 180893.6N Camera height 23.01m AOD Looking at Centre of Site Bearing 125.2°, distance 0.8km Photography Details Height of camera 1.60m above ground Date of photograph 27/10/2022 Time of photograph 13:41 Canon EOS 5D Mark IV DSLR Lens 50mm

11 | Outside Toilets At westbourne Grove And Denbigh Road







Camera Location National Grid Reference 524892.6E 180996.2N Camera height 22.23m AOD Looking at Centre of Site Bearing 144.0°, distance 0.7km Photography Details Height of camera 1.60m above ground Date of photograph 27/10/2022 Time of photograph 13:52 Canon EOS 5D Mark IV DSLR Lens 50mm

12 | Kensington Park Road - Opposite Junction With Ladbroke Square | Winter

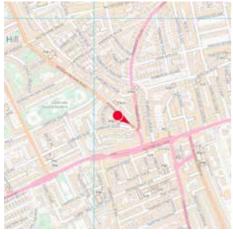






Camera Location National Grid Reference 525004.7E 180677.0N Camera height 28.84m AOD Looking at Centre of Site Bearing 131.8°, distance 0.4km Photography Details Height of camera 1.60m above ground Date of photograph 04/11/2022 Time of photograph 14:32 Canon EOS 5D Mark IV DSLR Lens 50mm

13 | Kensington Park Road - By Kensington Temple | Winter

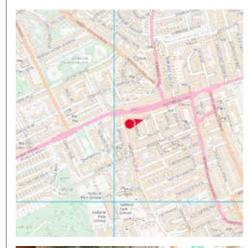






National Grid Reference 525104.6E 180573.8N Camera height 28.16m AOD Looking at Centre of Site Bearing 124.5°, distance 0.2km Photography Details Height of camera 1.60m above ground Date of photograph 04/11/2022 Time of photograph 14:13 Canon EOS 5D Mark IV DSLR Lens 50mm









National Grid Reference 525067.1E 180342.0N Camera height 32.28m AOD Looking at Centre of Site Bearing 72.9°, distance 0.3km Photography Details Height of camera 1.60m above ground Date of photograph 15/01/2023 Time of photograph 12:21 Canon EOS 5D Mark IV DSLR Lens 50mm

15 | At Junction Of Wycombe Square And Aubury Walk







National Grid Reference 525040.1E 180180.5N Camera height 40.29m AOD Looking at Centre of Site Bearing 51.4°, distance 0.4km Photography Details Height of camera 1.60m above ground Date of photograph 04/11/2022 Time of photograph 12:50 Canon EOS 5D Mark IV DSLR Lens 50mm

16 | Kensington Place - Junction With Hillgate







Camera Location National Grid Reference 525205.1E 180262.7N Camera height 32.53m AOD Looking at Centre of Site Bearing 51.6°, distance 0.2km Photography Details Height of camera 1.60m above ground Date of photograph 04/11/2022 Time of photograph 12:16 Canon EOS 5D Mark IV DSLR Lens 50mm

17 | Hillgate Place - By Hillgate Street







Camera Location National Grid Reference 525194.9E 180302.5N Camera height 31.07m AOD Looking at Centre of Site Bearing 53.0°, distance 0.2km Photography Details Height of camera 1.60m above ground Date of photograph 04/11/2022 Time of photograph 12:27 Canon EOS 5D Mark IV DSLR Lens 50mm

18 | Outside 16 Kensington Place







Camera Location National Grid Reference 525245.6E 180278.5N Camera height 31.11m AOD Looking at Centre of Site Bearing 51.7°, distance 0.2km Photography Details Height of camera 1.60m above ground Date of photograph 04/11/2022 Time of photograph 12:07 Canon EOS 5D Mark IV DSLR Lens 50mm

18N | Outside 16 Kensington Place DUSK







Camera Location National Grid Reference 525245.5E 180278.5N Camera height 31.09m AOD Looking at Centre of Site Bearing 52.2°, distance 0.2km Photography Details Height of camera 1.60m above ground Date of photograph 19/01/2023 Time of photograph 17:15 Canon EOS 5D Mark IV DSLR Lens 50mm

19 | Kensington Place - Junction With Jameson







Camera Location National Grid Reference 525297.7E 180299.0N Camera height 29.31m AOD Looking at Centre of Site Bearing 340.6°, distance 0.1km Photography Details Height of camera 1.60m above ground Date of photograph 25/10/2022 Time of photograph 12:53 Canon EOS 5D Mark IV DSLR Lens 50mm

20 | Hillgate Place - Outside No.1







Camera Location National Grid Reference 525278.3E 180336.6N Camera height 28.75m AOD Looking at Centre of Site Bearing 18.1°, distance 0.1km Photography Details Height of camera 1.60m above ground Date of photograph 04/11/2022 Time of photograph 11:58 Canon EOS 5D Mark IV DSLR Lens 24mm

21 | Kensington Place - Looking north Along **Newcombe Street**







Camera Location National Grid Reference 525339.0E 180314.8N Camera height 28.22m AOD Looking at Centre of Site Bearing 357.8°, distance 0.1km Photography Details Height of camera 1.60m above ground Date of photograph 04/11/2022 Time of photograph 11:39 Canon EOS 5D Mark IV DSLR Lens 24mm

22 | Outside 25 Ladbroke Road On Opposite Site Of The Road | Winter







Camera Location National Grid Reference 525085.8E 180533.4N Camera height 27.90m AOD Looking at Centre of Site Bearing 116.3°, distance 0.2km Photography Details Height of camera 1.60m above ground Date of photograph 19/01/2023 Time of photograph 14:54 Canon EOS 5D Mark IV DSLR Lens 24mm

23 | Pembridge Place, At Junction With Pembridge Villas I Winter







National Grid Reference 525274.8E 181025.0N Camera height 22.97m AOD Looking at Centre of Site Bearing 188.1°, distance 0.6km Photography Details Height of camera 1.60m above ground Date of photograph 27/10/2022 Time of photograph 14:45 Canon EOS 5D Mark IV DSLR Lens 50mm

24 | At Junction Of Dawson Place And Pembridge Place | Winter

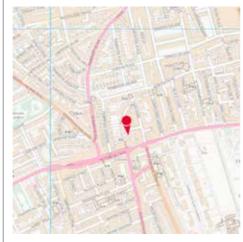






National Grid Reference 525314.9E 180842.7N Camera height 23.87m AOD Looking at Centre of Site Bearing 178.0°, distance 0.4km Photography Details Height of camera 1.60m above ground Date of photograph 30/01/2023 Time of photograph 15:03 Canon EOS 5D Mark IV DSLR Lens 50mm

25 | Linden Gardens - west Side | Winter







National Grid Reference 525333.8E 180598.9N Camera height 28.04m AOD Looking at Centre of Site Bearing 173.2°, distance 0.2km Photography Details Height of camera 1.60m above ground Date of photograph 25/10/2022 Time of photograph 10:57 Canon EOS 5D Mark IV DSLR Lens 50mm

26 | Pembridge Gardens - Outside No.6



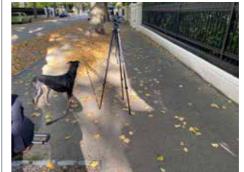




Camera Location National Grid Reference 525227.2E 180634.1N Camera height 27.22m AOD Looking at Centre of Site Bearing 164.4°, distance 0.2km Photography Details Height of camera 1.60m above ground Date of photograph 04/11/2022 Time of photograph 14:52 Canon EOS 5D Mark IV DSLR Lens 50mm

27 | Kensington Palace Gardens | Winter







Camera Location National Grid Reference 525642.8E 180224.5N Camera height 30.29m AOD Looking at Centre of Site Bearing 303.5°, distance 0.4km Photography Details Height of camera 1.60m above ground Date of photograph 30/01/2023 Time of photograph 13:23 Canon EOS 5D Mark IV DSLR Lens 50mm

A1 | Kensington Gardens - Lancaster Gate Entrance | Spring

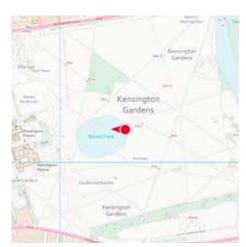






Camera Location National Grid Reference 526410.0E 180638.5N [Estimated] Camera height 24.99m AOD Looking at Centre of Site Bearing 260.7°, distance 1.1km Photography Details Height of camera 1.60m above ground Date of photograph 16/10/2022 Time of photograph 08:39 Canon EOS 5D Mark IV DSLR Lens 50mm

A2 | Kensington Gardens - east Of Round Pond | Winter







A4 | Gardens - Broadwalk Looking Across Kensington Palace | Summer







A6 | Kensington Gardens - Broadwalk Looking Across Kensington Palace | Winter



A7 | Talbot Road, Looking south Along Moorhouse Road

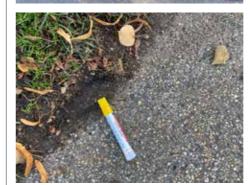




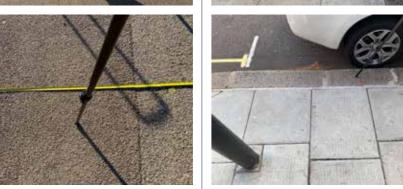












Camera Location National Grid Reference 526287.1E 180144.9N [Estimated] Camera height 26.16m AOD Looking at Centre of Site Bearing 271.8°, distance 1.0km Photography Details Height of camera 1.60m above ground Date of photograph 16/10/2022 Time of photograph 09:02 Canon EOS 5D Mark IV DSLR

Lens 50mm

National Grid Reference 526048.0E 180044.0N [Estimated] Camera height 26.59m AOD Looking at Centre of Site Bearing 288.2°, distance 0.8km Photography Details Height of camera 1.60m above ground Date of photograph 16/10/2022 Time of photograph 09:22 Canon EOS 5D Mark IV DSLR Lens 50mm

Camera Location National Grid Reference 526065.8E 179957.7N [Estimated] Camera height 25.61m AOD Looking at Centre of Site Bearing 300.7°, distance 0.9km Photography Details Height of camera 1.60m above ground Date of photograph 16/10/2022 Time of photograph 10:10 Canon EOS 5D Mark IV DSLR Lens 50mm

Camera Location National Grid Reference 526039.8E 179986.7N [Estimated] Camera height 25.94m AOD Looking at Centre of Site Bearing 288.4°, distance 0.9km Photography Details Height of camera 1.60m above ground Date of photograph 16/10/2022 Time of photograph 09:59 Canon EOS 5D Mark IV DSLR Lens 50mm

Camera Location National Grid Reference 526024.7E 180036.4N [Estimated] Camera height 26.31m AOD Looking at Centre of Site Bearing 298.3°, distance 0.8km Photography Details Height of camera 1.60m above ground Date of photograph 16/10/2022 Time of photograph 09:47 Canon EOS 5D Mark IV DSLR Lens 50mm

National Grid Reference 525110.8E 181338.5N [Estimated] Camera height 23.47m AOD Looking at Centre of Site Bearing 167.3°, distance 0.9km Photography Details Height of camera 1.60m above ground Date of photograph 04/11/2022 Time of photograph 15:47 Canon EOS 5D Mark IV DSLR Lens 50mm

A8 | Talbot Road, Looking south Along Courtnell













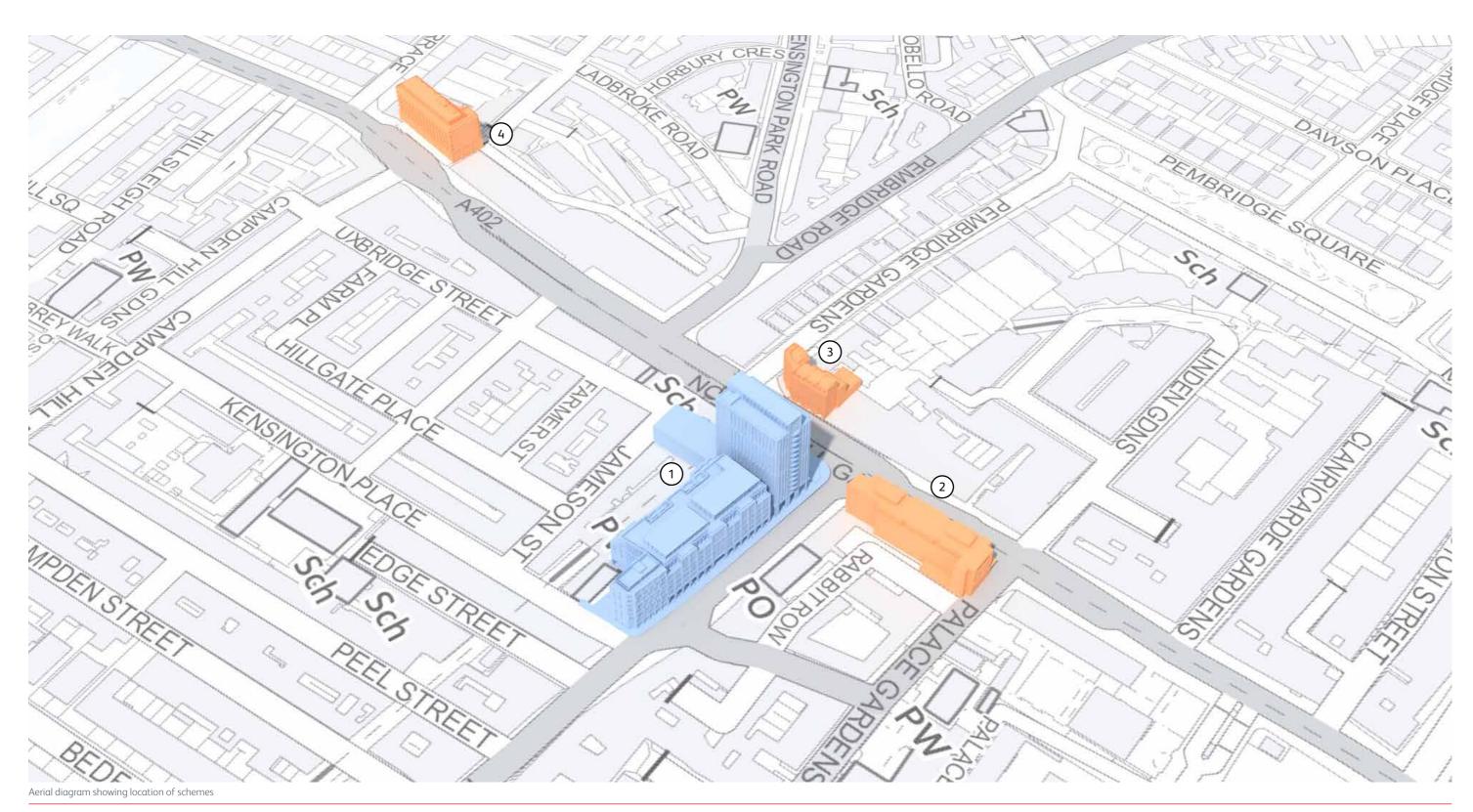
Camera Location National Grid Reference 525049.9E 181325.4N [Estimated] Camera height 23.21m AOD Looking at Centre of Site Bearing 162.9°, distance 0.9km Photography Details Height of camera 1.60m above ground Date of photograph 27/10/2022 Time of photograph 14:08 Canon EOS 5D Mark IV DSLR Lens 50mm

Camera Location National Grid Reference 525170.6E 181353.9N [Estimated] Camera height 23.59m AOD Looking at Centre of Site Bearing 175.4°, distance 0.9km Photography Details Height of camera 1.60m above ground Date of photograph 27/10/2022 Time of photograph 14:24 Canon EOS 5D Mark IV DSLR Lens 50mm

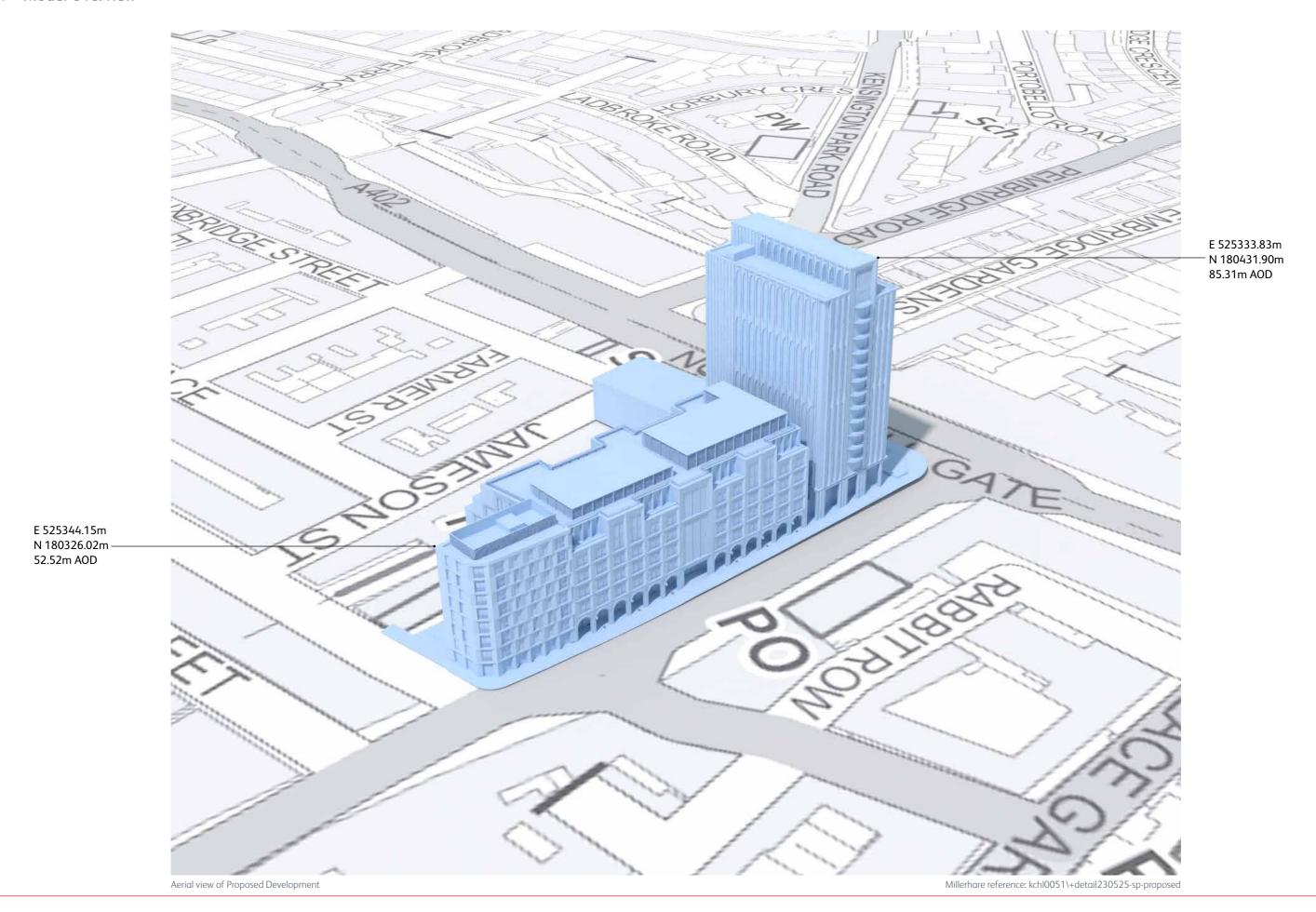
Appendix D (contin	nued)		

D3 Details of schemes

in	dex scheme name	address	reference	PA	status	source of model data	positioning method	MH reference	colour
	1 Newcombe House	Newcombe House, Notting Hill Gate, London	n/a	RBKC	Proposed	Paper planning application drawings from local authority	Best fit to Ordnance Survey	kchl0051.detail230525-sp-proposed	Blue
	2 15-35 Notting Hill Gate	15-35 Notting Hill Gate, London, W11 3JQ	PP/16/05212	RBKC	Legal Consent granted	Model supplied by Squire and Partners	Position relative to O.S. supplied by architect	kchl0029.profile160728-sp-proposed-eastblock	Orange
	3 66-74 Notting Hill Gate	66-70 and 72-74 Notting Hill Gate, LONDON, W11 3HT	PP/15/05730	RBKC	Legal Consent granted	n/a	n/a	kchl0179.mass160412-dp-consented	Orange
	4 146-164 Notting Hill Gate	146-164 Notting Hill Gate, LONDON, W11 3QG	PP/19/04764	RBKC	Submitted for planning	Paper planning application drawings from local authority	Best fit to Ordnance Survey	kchl0157.mass190920-dp-proposed	Orange



D4 Model Overview



Accurate Visual Representations

Each of the views in this study has been prepared as an Accurate Visual Representation (AVR) following a consistent methodology and approach to rendering. Appendix C of the London View Management Framework: Supplementary Planning Guidance (March 2012) defines an AVR as:

> "An AVR is a static or moving image which shows the location of a proposed development as accurately as possible; it may also illustrate the degree to which the development will be visible, its detailed form or the proposed use of materials. An AVR must be prepared following a well-defined and verifiable procedure and can therefore be relied upon by assessors to represent fairly the selected visual properties of a proposed development. AVRs are produced by accurately combining images of the proposed building (typically created from a three-dimensional computer model) with a representation of its context; this usually being a photograph, a video sequence, or an image created from a second computer model built from survey data. AVRs can be presented in a number of different ways, as either still or moving images, in a variety of digital or printed formats."

D5.2 The Landscape Institute Technical Guidance Note 06/19 "Visual Representation of Development Proposals" notes that the production of technical visualisations:

> "should allow competent authorities to understand the likely effects of the proposals on the character of an area and on views from specific points."

Paragraph 2.2 highlights that the baseline photography should:

> "be sufficiently up-to-date to reflect the current baseline situation"

"include the extent of the site and sufficient context;"

"be based on good quality imagery, secured in good, clear weather conditions wherever reasonably possible;"

D5.4 In this study the baseline condition is provided by carefully taken large format photography. The proposed condition is represented as an accurate photomontage, which combines a computer generated image with the photographic context. In preparing AVRs of this type certain several key attributes need to be determined, including:

- the Field of View
- the representation of the Proposed Development
- documentation accompanying the AVR

Selection of Field of View

D5.5 The choice of telephoto, standard or wide-angle lens, and consequently the Field of View, is made on the basis of the requirements for assessment which will vary from view to view.

D5.6 In the simple case the lens selection will be that which provides a comfortable Viewing Distance. This would normally entail the use of what most photographers would refer to as a "standard" or "normal" lens, which in practice means the use of a lens with a 35mm equivalent focal length of between about 40 and 58 mm.

However in a visual assessment there are three scenarios where constraining the study to this single fixed lens combination would not provide the assessor with the relevant information to properly assess the Proposed Development in its context.

Field Of View

The term 'Field Of View' (FOV) or more specifically Horizontal Field of View (HFOV), refers to the horizontal angle of view visible in a photograph or printed image and is expressed in degrees. It is often generally referred to as 'angle of view', 'included angle' or 'view cone angle'.

Using this measure it becomes practical to make a comparison between photographs taken using lens of various focal lengths captured on to photographic film or digital camera sensors of various size and proportions. It is also possible to compare computer renderings with photographic images.

Studies of this type use a range of camera equipment; in recent times digital cameras have largely superseded the traditional film formats of 35mm, medium format (6cm x 6cm) and large format (5in x 4in). Comparing digital and film formats may be achieved using either the HFOV or the 35mm equivalent lens calculation, however quoting the lens focal length (in mm) is not as consistently applicable as using the HFOV when comparing AVRs.

35mm Lens	HFOV degrees	Lens focal length (mm)
Wide angle lens	74.0	24
Medium wide lens	54.4	35
Standard lens	39.6	50
Telephoto lens	28.8	70
Telephoto lens	20.4	100
Telephoto lens	10.3	200
Telephoto lens	6.9	300

The FOV of digital cameras is dependent on the physical dimensions of the CCD used in the camera. These depend on the make and model of the camera. The comparison table uses the specifications for a Canon EOS-5D Mark II which has CCD dimensions of 36.0mm x 22.0mm.

D5.8 Firstly, where the relationship being assessed is distant, the observer would tend naturally to focus closely on it. At this point the observer might be studying as little as 5 to 10 degrees in plan. The printing technology and image resolution of a print limit the amount of detail that can be resolved on paper when compared to the real world, hence in this situation it is appropriate to make use of a telephoto lens.

D5.9 Secondly, where the wider context of the view must be considered and in making the assessment a viewer would naturally make use of peripheral vision in order to understand the whole. A print has a fixed extent which constrains the angle of view available to the viewer and hence it is logical to use a wide angle lens in these situations in order to include additional context in the print.

D5.10 Thirdly where the viewing point is studied at rest and the eye is free to roam over a very wide field of view and the whole setting of the view can be examined by turning the head. In these situations it is appropriate to provide a panorama comprising of a number of photographs placed side by side.

D5.11 The Landscape Institute Technical Guidance Note 06/19 Appendix 1 suggests that where a standard lens in landscape or portrait orientation cannot capture the view then the use of wider-angled prime lenses should be considered. Appendix 13 further notes:

> "The 24mm tilt shift is typically used for visualisation work where viewpoints are located close to a development and the normal range of prime lenses will not capture the proposed site"

D5.12 For some views two of these scenarios might be appropriate, and hence the study will include two versions of the same view with different fields of view.

Representation of the Proposed Development and cumulative schemes

Classification of AVRs

D5.13 AVRs are classified according to their purpose using Levels 0 to 3. These are defined in detail in Appendix C of the London View Management Framework: Supplementary Planning Guidance (July 2007). The following table is a summary.

AVR level	showing	purpose
AVR 0	Location and size of proposal	Showing Location and size
AVR 1	Location, size and degree of visibility of proposal	Confirming degree of visibility
AVR 2	As level 1 + description of architectural form	Explaining form
AVR 3	As level 2 + use of materials	Confirming the use of materials

D5.14 In practice the majority of photography based AVRs are either AVR 3 (commonly referred to as "fully rendered" or "photoreal") or AVR 1 (commonly referred to as "wire-line"). Model based AVRs are generally AVR 1.

AVR 3 - Photoreal



Example of AVR 3 – confirming the use of materials (in this case using a 'photo-realistic' rendering technique)

D5.15 The purpose of a Level 3 AVR is to represent the likely appearance of the Proposed Development under the lighting conditions found in the photograph. All aspects of the images that are able to be objectively defined have been created directly from a single detailed description of the building. These include the geometry of the building and the size and shape of shadows cast by the sun.

Beyond this it is necessary to move into a somewhat more subjective arena where the judgement of the delineator must be used in order to define the final appearance of the building under the specific conditions captured by the photographic and subsequent printing processes. In this area the delineator is primarily guided by the appearance of similar types of buildings at similar distances in the selected photograph. In large scope studies photography is necessarily executed over a long period of time and sometimes at short notice. This will produce a range of lighting conditions and photographic exposures. The treatment of lighting and materials within these images will respond according to those in the photograph.

D5.17 Where the Proposed Development is shown at night-time, the lightness of the scheme and the treatment of the materials was the best judgment of the visualiser as to the likely appearance of the scheme given the intended lighting strategy and the ambient lighting conditions in the background photograph. In particular the exact lighting levels are not based on photometric calculations and therefore the resulting image is assessed by the Architect and Lighting Designer as being a reasonable interpretation of the concept lighting strategy.

AVR 1 - Outline



Example of AVR 1 confirming degree of visibility (in this case as an occluded 'wire-line' image)

- D5.18 The purpose of a wire-line view is to accurately indicate the location and degree of visibility of the Proposed Development in the context of the existing condition and potentially in the context of other proposed schemes.
- D5.19 In AVR1 representation each scheme is represented by a single line profile, sometimes with key edges lines to help understand the massing. The width of the profile line is selected to ensure that the diagram is clear, and is always drawn inside the true profile. The colour of the line is selected to contrast with the background. Different coloured lines may be used in order to distinguish between proposed and consented status, or between different schemes.
- D5.20 Where more than one scheme is represented in outline form the outlines will obscure each other as if the schemes where opaque. Trees or other foliage will not obscure the outline of schemes behind them. This is because the transparency of trees varies with the seasons, and the practical difficulties of representing a solid line behind a filigree of branches. Elements of a temporary nature (e.g. cars, tower cranes, people) will similarly not obscure the outlines.

Framing the view

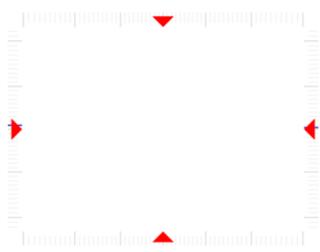
Typically AVRs are composed with the camera looking horizontally i.e. with a horizontal Optical Axis. This is in order to avoid converging verticals which, although perspectively correct, appear to many viewers as unnatural in print form. The camera is levelled using mechanical levelling devices to ensure the verticality of the Picture Plane, being the plane on to which the image is projected; the film in the case of large format photography or the CCD in the case of digital photography.

- D5.22 For a typical townscape view, a Landscape camera format is usually the most appropriate, giving the maximum horizontal angle of view. Vertical rise may be used in order to reduce the proportion of immediate foreground visible in the photograph. Horizontal shift will not be used. Where the prospect is framed by existing buildings, portrait format photographs may be used if this will result in the proposal being wholly visible in the AVR, and will not entirely exclude any relevant existing buildings.
- D5.23 Where the Proposed Development would extend off the top of the photograph, the image may be extended vertically to ensure that the full height of the Proposed Development is show. Typically images will be extended only where this can be achieved by the addition of sky and no built structures are amended. Where it is necessary to extend built elements of the view, the method used to check the accuracy of this will be noted in the text.

Documenting the AVR

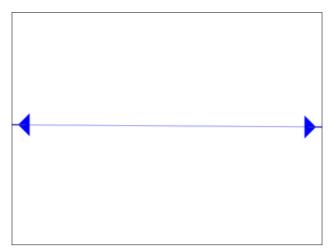
Border annotation

- D5.24 A Millerhare AVR image has an annotated border or 'graticule' which indicates the field of view, the optical axis and the horizon line. This annotation helps the user to understand the characteristics of the lens used for the source photograph, whether the photographer applied tilt, vertical rise or horizontal shift during the taking of the shot and if the final image has been cropped on one or more sides.
- D5.25 The four red arrows mark the horizontal and vertical location of the 'optical axis'. The optical axis is a line passing through the eye point normal to the projection plane. In photography this line passes through the centre of the lens, assuming that the film plane has not been tilted relative to the lens mount. In computer rendering it is the viewing vector, i.e the line from the eye point to the target point.
- D5.26 If the point indicated by these marks lies above or below the centre of the image, this indicates either that vertical rise was used when taking the photograph or that the image has subsequently been cropped from the top or bottom edge. If it lies to the left or right of the centre of the image then cropping has been applied to one side or the other, or more unusually that horizontal shift was applied to the photograph.



Sample graticule showing optical axis markers

- D5.27 The vertical and horizontal field of view of the final image is declared using a graticule consisting of thick lines at ten degree increments and intermediate lines every degree, measured away from the optical axis. Using this graticule it is possible to read off the resultant horizontal and vertical field of view, and thereby to compare the image with others taken using specific lens and camera combinations. Alternatively it can be used to apply precise crops during subsequent analysis
- 05.28
- D5.29 The blue marks on the left and right indicate the calculated location of the horizon line i.e. a plane running horizontally from the location of the camera. Where this line is above or below the optical axis, this indicates that the camera has been tilted; where it is not parallel with the horizontal marking of the optical axis, this indicates that the camera was not exactly horizontal, i.e. that "roll" is present. Note that a small amount of tilt and roll is nearly always present in a photograph, due to the practical limitations of the levelling devices used to align the camera in the field.



Sample graticule showing horizon line markers

Comparing AVRs with different FOVs

D5.30 A key benefit of the index markings is that it becomes practical to crop out a rectangle in order to simulate the effect of an image with a narrower field of view. In order to understand the effect of using a longer lens it is simply necessary to cover up portions of the images using the graticule as a guide.

Methodology for the production of Accurate Visual Representations

Overview of Methodology

- D6.1 The study was carried out by Millerhare (the Visualiser) by combining computer generated images of the Proposed Development with either large format photographs or with rendered images from a context model at key strategic locations around the site as agreed with the project team. Surveying was executed by Absolute Survey (the Surveyor).
- D6.2 The methodology employed by Millerhare is compliant with Appendix C of the London View Management Framework: Supplementary Planning Guidance (March 2012) and Landscape Institute Technical Guidance Note 06/19.
- The project team defined a series of locations in London where the proposed buildings might have a significant visual effect. At each of these locations Millerhare carried out a preliminary study to identify specific Assessment Points from which a representative and informative view could be taken. Once the exact location had been agreed by the project team, a photograph was taken which formed the basis of the study. The precise location of the camera was established by the Surveyor using a combination of differential GPS techniques and conventional observations.
- D6.4 For views where a photographic context was to be used additional surveying was carried out. A number of features on existing structures visible from the camera location were surveyed. Using these points, Millerhare has determined the appropriate parameters to permit a view of the computer model to be generated which exactly overlays the appropriate photograph. Each photograph has then been divided into foreground and background elements to determine which parts of the current context should be shown in front of the Proposed Development and which behind. When combined with the computer-generated image these give an accurate impression of the impact of the Proposed Development on the selected view in terms of scale, location and use of materials (AVR Level 3).

Spatial framework and reference database

- D6.5 All data was assembled into a consistent spatial framework, expressed in a grid coordinate system with a local plan origin. The vertical datum of this framework is equivalent to Ordnance Survey (OS) Newlyn Datum.
- D6.6 By using a transformation between this framework and the OSGB36 (National Grid) reference framework, Millerhare have been able to use other data sets (such as OS land line maps and ortho-corrected aerial photography) to test and document the resulting photomontages.
- D6.7 In addition, surveyed observation points and line work from Millerhare's London Model database are used in conjunction with new data in order to ensure consistency and reliability.

D6.8 The models used to represent consented schemes have been assembled from a variety of sources. Some have been supplied by the original project team, the remainder have been built by Millerhare from available drawings, generally paper copies of the submitted planning application. While these models have not been checked for detailed accuracy by the relevant architects, Millerhare has used its best endeavours to ensure that the models are positioned accurately both in plan and in overall height.

Process – photographic context

Reconnaissance

- 6.9 At each Study Location the Visualiser conducted a photographic reconnaissance to identify potential Assessment Points. From each candidate position, a digital photograph was taken looking in the direction of the Proposed Development using a wide angle lens. Its position was noted with field observations onto an OS map and recorded by a second digital photograph looking at a marker placed at the Assessment Point.
- D6.10 In the situation where, in order to allow the appreciation of the wider setting of the proposal, the assessor requires more context than is practical to capture using a wide angle lens, multiple photographs may be combined to create a panorama, typically as a diptych or triptych. This will be prepared by treating each panel as a separate AVR and then combining in to a single panorama as a final process.
- D6.11 The Visualiser assigned a unique reference to each Assessment Point and Photograph.

Final Photography

- D6.12 From each selected Assessment Point a series of large format photographs were taken with a camera height of approximately 1.6m. The camera, lens, format and direction of view are determined in accordance with the policies set out above
- D6.13 Where a panoramic view is specified the camera/tripod head is rotated through increments of 40 degrees to add additional panels to the left and/or right of the main view.
- D6.14 The centre point of the tripod was marked and a digital photograph showing the camera and tripod in situ was taken to allow the Surveyor to return to its location. Measurements and field notes were also taken to record the camera location, lens used, target point and time of day.

Surveying the Assessment Points

D6.15 For each selected Assessment Point a survey brief was prepared, consisting of the Assessment Point study sheet and a marked up photograph indicating alignment points to be surveyed. Care was taken to ensure that a good spread of alignment points was selected, including points close to the camera and close to the target.

- D6.16 Using differential GPS techniques the Surveyor established the location of at least two intervisible stations in the vicinity of the camera location. A photograph of the GPS antenna in situ was taken as confirmation of the position.
- D6.17 From these the local survey stations, the requested alignment points were surveyed using conventional observation.
- D6.18 The resulting survey points were amalgamated into a single data set by the Surveyor. This data set was supplied as a spread-sheet with a set of coordinates transformed and re-projected into OSGB36 (National Grid) coordinates, and with additional interpreted lines to improve the clarity of the surveyed data.
- D6.19 From the point set, the Visualiser created a three dimensional alignment model in the visualisation system by placing inverted cones at each surveyed point.

Photo preparation

- D6.20 From the set of photographs taken from each Assessment Point, one single photograph was selected for use in the study. This choice was made on the combination of sharpness, exposure and appropriate lighting.
- D6.21 The selected photograph was copied into a template image file of predetermined dimensions. The resulting image was then examined and any artefacts related to the digital image capture process were rectified.
- D6.22 Where vertical rise has been used the image is analysed and compensation is applied to ensure that the centre of the image corresponds to the location of the camera's optical axis.

Calculating the photographic alignment

- D6.23 A preliminary view definition was created within the visualisation system using the surveyed camera location, recorded target point and FOV based on the camera and lens combination selected for the shot
- D6.24 A lower resolution version of the annotated photograph was attached as a background to this view, to assist the operator to interpret on-screen displays of the alignment model and other relevant datasets.
- Using this preliminary view definition, a rendering was created of the alignment model at a resolution to match the scanned photograph. This was overlaid onto the background image to compare the image created by the actual camera and its computer equivalent. Based on the results of this process adjustments were made to the camera definition. When using a wide angle lens observations outside the circle of distortion are given less weighting.
- D6.26 This process was iterated until a match had been achieved between the photograph and alignment model. At this stage, a second member of staff verified the judgements made. An A3 print was made of the resulting photograph overlaid with the

alignment model as a record of the match. This was annotated to show the extents of the final views to be used in the study.



Example of alignment model overlaid on the photograph

Preparing models of the Proposed Development

- 7 A CAD model of the Proposed Development was created from 3D CAD models and 2D drawings supplied by the Architect. The level of detail applied to the model is appropriate to the AVR type of the final images.
- D6.28 Models of the Proposed Development and other schemes are located within the spatial framework using reference information supplied by the Architect or, when not available, by best fit to other data from the spatial framework reference database . Study renders of the model are supplied back to the Architect for confirmation of the form and the overall height of the Proposed Development. The method used to locate each model is recorded. Each distinct model is assigned a unique reference code by the Visualiser.

Determining occlusion and creating simple renderings

- A further rendering was created using the aligned camera, which combined the Proposed Development with a computer-generated context. This was used to assist the operator to determine which parts of the source image should appear in front of the Proposed Development and which behind it. Using this image and additional site photography for information, the source file is divided into layers representing foreground and background elements.
- D6.30 In cases where the Proposed Development is to be represented in silhouette or massing form (AVR1 or AVR2), final renderings of an accurate massing model were generated and inserted into the background image file between the foreground and background layers.
- D6.31 Final graphical treatments were applied to the resulting image as agreed with the Architect and environmental and planning consultants. These included the application of coloured outlines to clarify the reading of the images or the addition of tones to indicate occluded areas.

Creating more sophisticated renderings

- De.32 Where more sophisticated representations of the Proposed Developments were required (AVR3) the initial model is developed to show the building envelope in greater detail. In addition, definitions were applied to the model to illustrate transparency, indicative material properties and inter-reflection with the surrounding buildings.
- D6.33 For each final view, lighting was set in the visualisation system to match the theoretical sunlight conditions at the time the source photograph was taken, and additional model lighting placed as required to best approximate the recorded lighting conditions and the representation of its proposed materials.
- D6.34 By creating high resolution renderings of the detailed model, using the calculated camera specification and approximated lighting scenario, the operator prepared an image of the building that was indicative of its likely appearance when viewed under the conditions of the study photograph. This rendering was combined with the background and foreground components of the source image to create the final study images.
- D6.35 A single CAD model of the Proposed Development has been used for all distant and local views, in which the architectural detail is therefore consistently shown. Similarly a single palette of materials has been applied. In each case the sun angles used for each view are transferred directly from the photography records.
- D6.36 Material definitions have been applied to the models assembled as described. The definitions of these materials have been informed by technical notes on the planning drawings and other available visual material, primarily renderings created by others. These resulting models have then been rendered using the lighting conditions of the photographs.
- D6.37 Where the Proposed Development is shown at night-time, the lightness of the scheme and the treatment of the materials was the best judgment of the visualiser as to the likely appearance of the scheme given the intended lighting strategy and the ambient lighting conditions in the background photograph.
- D6.38 Where a panoramic view is specified each panel is prepared by treating each photograph as an individual AVR following the process described in the previous paragraphs. The panels are then arranged side by side to construct the panorama. Vertical dividers are added to mark the edge of each panel in order to make clear that the final image has been constructed from more than one photograph.

Documenting the study

D6.39 For each Assessment Point a CAD location plan was prepared, onto which a symbol was placed using the coordinates of the camera supplied by the Surveyor. Two images of this symbol

- were created cross-referencing background mapping supplied by Ordnance Survey.
- D6.40 The final report on the Study Location was created which shows side by side, the existing and proposed prospect. These were supplemented by images of the location map, a record of the camera location and descriptive text. The AVR level is described.
- D6.41 Peripheral annotation was added to the image to clearly indicate the final FOV used in the image, any tilt or rise, and whether any cropping has been applied.
- D6.42 Any exceptions to the applied policies or deviations from the methodology were clearly described.
- D6.43 Where appropriate, additional images were included in the study report, showing the Proposed Development in the context of other consented schemes.

Process - modelled context



Example of AVR using a modelled context

Reconnaissance

- D6.44 At each Study Location the Visualiser conducted a photographic reconnaissance to identify potential Assessment Points. From each candidate position, a digital photograph was taken looking in the direction of the Proposed Development using a wide angle lens. Its position was noted with field observations onto an OS map and recorded by a second digital photograph looking at a marker placed at the Assessment Point.
- D6.45 The Visualiser assigned a unique reference to each Assessment Point and Photograph.

Reference Photography

D6.46 From each selected Assessment Point a large format photograph was taken with a camera height of approximately 1.6m. The camera, lens, format and direction of view are determined in accordance with the policies set out above

D6.47 The centre point of the tripod was marked and a digital photograph showing the camera and tripod in situ was taken to allow the Surveyor to return to its location. Measurements and field notes were also taken to record the camera location, lens used, target point and time of day.

Surveying the Assessment Points

- D6.48 For each selected Assessment Point a survey brief was prepared consisting of the Assessment Point study sheet.
- D6.49 Using differential GPS techniques the Surveyor established the location of at least two intervisible stations in the vicinity of the camera location. A photograph of the GPS antenna in situ was taken as confirmation of the position.

Creating the context model

- D6.50 Three dimension model data from a variety of sources was assembled to determine the location of significant roofscape features (parapet edges, ridge lines, chimneys etc) and groundscape features (kerb and dock edges, walls etc).
- D6.51 From this data an accurate roofscape model was prepared. For buildings close to the site fenestration detail was added to the model to aid in understanding the scale of the context. Indicative trees with estimated height and width where added to the model. Additional entourage (cars, buses, street furniture etc) was inserted in order to provide scale.

Creating the study model

- D6.52 Using drawings and 3D models supplied by the Architects, an accurate massing model of the project was created showing all significant elements of the building that would affect that overall silhouette of the proposals. A palette of simple abstract materials is applied to the model. In general specific construction materials are not shown, except for glass which is used in order to indicate a degree of transparency where this affects the profile of the Proposed Development.
- D6.53 Using data supplied by the Architects that defined the relationship of the building grid to the Ordnance Survey, the completed study model was located in the same geometric space as the context model, the survey and other reference data.
- D6.54 Indicative trees with estimated height and width where added to the model. Additional entourage (cars, buses, street furniture etc) was inserted in order to provide scale.

Rendering and Post-production

D6.55 For each selected view, a virtual camera was created at the same location as the digital photograph and using a similar FOV and target. Renders of both the existing model and the proposal model were produced using lighting from a sun at an appropriate time of day. As the models are internally consistent the relationship of the Proposed Development to the context is exact.

Documenting the study

- D6.56 For each Assessment Point a CAD location plan was prepared, onto which a symbol was placed using the coordinates of the camera supplied by the Surveyor. Two images of this symbol were created cross-referencing background mapping supplied by Ordnance Survey.
- D6.57 The final report on the Study Location was created which shows side by side, the existing and proposed prospect. These were supplemented by images of the location map, a record of the camera location and descriptive text. The AVR level is described.
- D6.58 Peripheral annotation was added to the image to clearly indicate the final FOV used in the image, any tilt or rise, and whether any cropping has been applied.
- D6.59 Any exceptions to the applied policies or deviations from the methodology were clearly described.
- D6.60 Where appropriate, additional images were included in the study report, showing the Proposed Development in the context of other consented schemes.

Appendix E

Zone of Theoretical Visibility Study

Introduction

- 7.15 The following Zone of Theoretical Visibility (ZTV) has been prepared in support of the development by Beltane Asset Management at Newcombe House, Notting Hill Gate, London.
- 7.16 A ZTV, also referred to as a Zone of Visual Influence or Viewshed, objectively calculates the theoretical visibility of a development across a defined study area. It then illustrates locations within the study area from which any part of the development is theoretically visible.
- 7.17 The analysis does not assess the qualitative nature or magnitude of visibility and should therefore be supported by other methods of visual impact assessment.

Methodology

- 7.18 A 3D representation of the terrain, buildings and other built structures across the study area is assembled. The data used in this analysis is derived from commercially available 3D models licensed to Millerhare and is typically accurate to within 0.25m-0.50m.
- 7.19 The terrain model is extracted from the data and is raised by 1.6m to simulate the average eye level of a pedestrian. The 3D tree data used to generate this analysis has several limitations, the result of which can over-represent visibility. The size, profile and location of tree canopies has a low level of accuracy, and no account is taken of the seasonal change in canopy density.
- 7.20 The ZTV has been calculated in the context of existing buildings; no consented or unbuilt buildings have been included in the analysis.
- 7.21 These context models are combined with a model of the development being studied. A series of lights are placed at the upper extremities of the development and a record is made of areas on the raised ground plane that are illuminated by one or more of these light sources. These areas are then overlain onto an OS plan and shown in a coloured tone.

