



STATEMENT OF CORRECTION IN RESPONSE TO 'TECHNICAL AUDIT' OF REALM VISUALISATIONS

Ref: 2952/Marden

Date: 11th November

Project: Land East of Albion Road and Copper Lane, Marden

To whom it may concern:

Realm would offer the following corrective statement made on the 'Technical Review' of our work conducted by MS envision (ref: APPENDIX A):

Independent Assessment vs Commercial Interest

First and foremost it should be made abundantly clear that Mr Spence is **not** a fully independent person (as he appears to present himself) but is in essence a commercial competitor of ours with his own practice and therefore has a commercial interest in the outcome of the 'technical critique' as presented. Any comments made must therefore be properly seen in this light and within this context.

Industry Standard Technical Methodology vs Outlier Technical Methodology

Along with other high-profile and key industry players Miller Hare and Hayes Davidson, our practice was one of the three pioneers of verified view production (also known as Accurate Visual Representations, VVMs or AVRs) dating back to 1999. In the intervening period we have completed almost 3,000 projects with around 60% of them being for verified view projects

Our shared methodology, which is industry standard practice, was honed further following the Vauxhall Tower project in London in the early 2000s where my company was commissioned to produce 172 verified views of the Tower for the Public Inquiry (which at that time was the largest Public Inquiry of its type), before the scheme was duly consented by the then Secretary of State. Since then we have delivered just short of 3000 projects, urban and rural, and work for most of the leading planning consultancies, developers and various associates. Our work is often produced to successfully support appeals and as part of PoE packs for clients.

We have worked with our photography and survey team for almost two decades and across the majority of projects. Our lead photographer, John Griffin, is probably the finest verified view specialist



photographer in the field and is certainly the go-to specialist for many of the visualisation practices. His work and processes are regarded as probably the best in the field, as are those of our surveyors.

Mr Spence makes various comments regarding our not aligning to LIDAR/DTM and that this is standard practice to do so:

Firstly, there is a very good reason why we do not align to LIDAR / DTM as the latter is simply not accurate enough in order to determine height information. Mr Spence's approach is essentially taken from Scottish windfarm practice as teams are frequently working in very remote areas where GNSS data is not available.

Secondly, Mr Spence is factually incorrect with his assertion that LIDAR/DTM is in any way standard practice in the industry. It is not. Matching to survey points derived from GNSS and Total Station is the industry standard for all verified view methodologies in England.

This being so his reliance on his approach as provisioning the main alignment data raises some very serious questions/concerns regarding residual accuracy.

Industry Standard Photography Methodology vs Outlier Photography Methodology

There appears to be a misunderstanding on Mr Spence's part regarding the projection geometry of the 3ds Max / V-Ray cameras in relation to 'cylindrical' projection output from photographic panorama stitching programs. We use a tested and proven system with a shared projection geometry in both photographic and 3d rendering output. In all practical purposes an equirectangular panoramic projection with a > 40 vertical FOV is visually indistinguishable from a typical cylindrical panoramic projection and the only differences are to be found where critical geometry matching at frame edges is required.

Similarly, in terms of lens choice Mr Spence's assertions regarding the use of 50mm lenses for panoramic views are problematic. There is some degree of misinformation circulating about the use of 35mm v 50mm lenses in panoramic photography. In our collective professional opinion and those of our associates a 35mm lens is the most appropriate to ensure accuracy when stitching panos. The stitching process itself is more involved and complex than for single frame photography and some outlier practice methodologies prefer/advocate using 50mm lenses as limiting the HFOV helps greatly in masking intrinsic errors in process. For this reason, we find that a 50mm lens (for panos) is not sufficient to achieve the benchmark accuracy that our practice accepts for verification and on upon which our reputation is founded. If a client insists that we use 50mm lenses for panos then we will do so but insist on caveating our methodology document accordingly. Landscape Institute Guidance (TGN 06/19) rightly asserts that 'landscape professionals may need to draw on the expertise of visualisation specialists, particularly for the most sophisticated forms of photography and visualisation' for this reason.



Mr Spence makes various other vague and spurious comments regarding the photomontages set ranging from the context captured in view, accuracy of our camera-matching process, model height information, production of wirelines and the timing of year when the images were taken for different iterations. Our responses are best summarised below:

- View context for each view was provided by the client and matched on site by the photographer, these previews were then issued to the client for approval prior to our starting work. The views are correctly captured and the site shown.
- Our camera-matching process is class-leading, proven over many years and checked thoroughly. There are no accuracy issues.
- Model and model height information (also planting) is supplied to us by the client and or the architect and is re-checked and signed off by them as part of the drafting and production process.
- While we retain tripod location photography in each project folder (for camera and survey equipment tripods) we do not, nor have we ever, included a photograph of them in the document. The reason for this is that it is irrelevant, detailed locational and survey data is already included in the document. This has no impact on the accuracy of views presented.
- Production of outputs per viewpoint (either as wireline, occluded wireline, parameter wireline, block model or fully rendered finish) is instructed by the client and is outside of our remit. Similarly, selection of the viewpoints themselves is instructed by the client and outside of our remit. This has no impact on the accuracy of views presented.
- The time of year at which photography is commissioned on a project is instructed by the client and is outside of our remit. This has no impact on the accuracy of views presented.

Presentation and Printing of Images

Where panoramic views are requested, virtually all clients prefer to have material printed on A3 format as this is considerably more manageable than A0 sheets, particularly should the sheets be taken out on site to the development (which often happens). Should it be felt that larger formats are preferable in an internal meeting context then of course printing to a larger format is perfectly acceptable. It must be clearly stated that format is a presentation issue and has no discernible impact on the inherent accuracy of the views presented.

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Concluding Remarks

Each visualisation practice/consultant has their own preferred methodology/approach and operates with the general guidelines of the LI Technical Guidance (TGN 06/19) in mind - guidance which is a) just that 'guidance' and not prescription and b) is regularly updated (and is also currently under review).

Overall, the main thrust of Mr Spence's critique appears largely to be based on a mix of subjective opinion, 'differing ways of doing things' conjectural interpretation and occasional factual inaccuracy.

Nothing in the document from Mr Spence supports in any way his assertions that the views are inaccurate or 'unreliable' and some of the lesser points rather suggest a degree of clutching at straws to try and discredit the work. Nor does he offer any specific evidence to corroborate his perceived view that our work or that of our associates (including our methodologies) is inaccurate, merely an apparent surmising that as the methodology differs from his own that ours is somehow inherently 'wrong'. His overall conclusion that the photomontages cannot be relied upon as accurate is baseless and really rather absurd.

Our work is robust and proven, repeatedly, and Mr Spence is put to strict proof to provide evidence to the contrary.

The directors of the company and its associates take a poor view of the attempt to impugn our work and reputational standing through such unsubstantiated, factually incorrect, misleading and somewhat borderline remarks regarding our professional output.

Yours sincerely

Martin Barratt
Managing Director

Cc: directors