Appendix 12.2 Townscape and Visual Impact Assessment (TVIA) Methodology

Malt Street

Appendix 12.2

Townscape and Visual Impact Assessment (TVIA) Methodology

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For and on behalf of Peter Brett Associates LLP				

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1 Introduction

1.1 Definition of Townscape

1.1.1 **Townscape** is defined by the Landscape Institute in paragraph 1.2 of the Landscape Institute Technical Information Note 05/2017: Townscape Character Assessment, as:

'*…the landscape within the built-up area, including the buildings, the relationship between them, the different types of urban open spaces, including green spaces and the relationship between buildings and open spaces*.

1.1.2 **Townscape** is also defined in Transport Analysis Guidance (WebTAG) Unit A3, chapter 7: Impacts on Townscape (Department for Transport, December 2015), paragraphs 7.1.1 and 7.1.2:

'Townscape is the physical and social characteristics of the built and unbuilt urban environment and the way in which we perceive those characteristics. It is this mix of characteristics and perceptions that make up and contribute to townscape character and give a 'sense of place' or identity.

The physical characteristics of a townscape are expressed by the development form of buildings, structures and spaces. The development form influences the pattern of uses, activity and movement in a place and the experience of those who visit, work and live there.'

1.2 Professional Standards and Guidance

1.2.1 The Townscape and Visual Impact Assessment (TVIA) has been carried out by a chartered landscape architect at PBA, a registered practice of the Landscape Institute (LI) and a corporate member of the Institute of Environmental Management and Assessment (IEMA).

1.2.2 PBA's methodology for TVIA is based on professional experience of townscape assessment and tall building studies, the **Guidelines for Landscape and Visual Impact Assessment** (Landscape Institute / Institute of Environmental Management and Assessment, 3rd Edition, 2013) and, where appropriate, the **Transport Analysis Guidance (WebTAG) Chapter 7: Impacts on Townscape**, TAG Unit A3 Environmental Impact Appraisal (December 2015). In addition, the TVIA methodology takes into account the principles set out in the following Landscape Institute technical notes and guidance:

- LI Technical Information Note 05/2017: **Townscape Character Assessment** (LI, revised April 2018) *https://www.landscapeinstitute.org/wp-content/uploads/2018/04/tin-05-2017-townscape.pdf*; and
- LI Advice Note 01/11 **Photography and Photomontage in Landscape and Visual Impact Assessment** (LI, 2011) *https://www.landscapeinstitute.org/PDF/Contribute/LIPhotographyAdviceNote01-11.pdf* and its emerging update, Technical Guidance Note, Public Consultation Draft 2018-06-01 *https://www.landscapeinstitute.org/wp-content/uploads/2018/06/draft-tin-2018-XX-photography-photomontage-lvia.pdf*.

1.3 Approach to the Assessment

1.3.1 The **Guidelines for Landscape and Visual Impact Assessment**, (Landscape Institute / Institute of Environmental Management and Assessment, 3rd Edition, 2013) (**GLVIA3**) notes in paragraph 1.17, page 9, in reference to the European Union Directive 2011/92/EU (now as amended by 2014/52/EU):

*"The Directive is clear that the emphasis is on the identification of **likely significant** environmental effects. This should embrace all types of effect and includes, for example, those that are positive/beneficial and negative/adverse, direct and indirect, and long and short term, as well as cumulative effects. Identifying significant effects stresses the need for an approach that is in proportion to the scale of the project that is being assessed and the nature of its likely effects. Judgement needs to be exercised at all stages in terms of the scale of investigation that is appropriate and proportional. This does not mean that effects should be ignored or their importance minimised but that the assessment should be tailored to the particular circumstances in each case.'*

1.3.2 The assessment of landscape or townscape and visual effects aims to be as objective as possible; however, professional judgements are required to be made, as **GLVIA3** explains in paragraph 2.23, page 21:

'*Professional judgement is a very important part of LVIA. Whilst there is some scope for quantitive measurement of some relatively objective matters, for example the number of trees lost to construction… much of the assessment must rely on qualitative judgements, for example about what effect the introduction of a new development of land use change may have on visual amenity, or about the significance of change in the character in the landscape and whether it is positive or negative.'*

1.3.3 In accordance with guidance, the TVIA considers the effects on townscape, including townscape character (townscape receptors) and people's views / visual amenity (visual receptors) as separate assessment components. The TVIA also identifies and assesses the negative and positive effects (type of effects) and significance of change arising from the proposed development on townscape and visual receptors.

1.3.4 The assessment of townscape and visual effects makes comparison with the **baseline year of 2018**, and the assessment periods comprise: i) during the demolition and construction period; and ii) at operation (on completion of the development).

The Context of Townscape and Visual Effects in the Urban Environment

1.3.5 Within urban locations, there is a general level of expectation for: regeneration, redevelopment and renewal; the efficient use of land to adapt and change; and for the anticipation of change to views within the townscape taking place over time.

1.3.6 In other words, **an urban environment is not static**; change and renewal is an integral part of that urban environment. Accordingly, the expected changing nature of the urban environment is taken into account within the TVIA.

1.3.7 New buildings may create either beneficial or adverse effects upon the urban environment. However, the evaluation of the quality of architectural design and appearance of buildings is a subjective issue, and one which does not form part of the TVIA process. Instead, it is assumed that the quality of the design of the proposals would be appropriate to the existing urban context, as set out in a separate Design and Access Statement for the proposed development. The TVIA is therefore based on assessing the **key design principles** of the Proposed Development and the consequential effects upon townscape elements and townscape character.

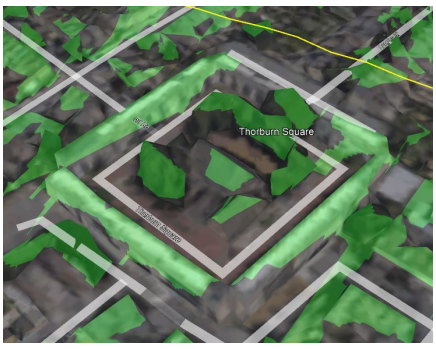
1.3.8 Whether new development located within a townscape leads to a positive or adverse visual change may be largely subjective. The assessment of visual effects in the TVIA has regard to the level of anticipated change and renewal of the urban environment, for example through the planned regeneration and development for an area, as set out in adopted local planning policies.

2 Scope of Assessment: Potential Effects

2.1 Scoping Report

2.1.1 A Scoping Report was submitted to the London Borough of Southwark (LBS) in May 2018, including an outline of the proposed scope and methodology for the TVIA. Comments received from the 2017 Scoping Opinion, 2017 Application, and the 2018 Scoping Opinion are set out in Appendix E. Townscape and visual issues are summarised in Table 2.1 below, together with a response in respect of TVIA matters.

Table 2.1: Summary of Consultation Responses: TVIA

Consultation Stage	
2017 and 2018 Scoping Reports and Opinions	
Scoping Opinion Comments	**PBA response: Townscape & Visual**
Para 39 (2017) and Para 48 (2018): "*The baseline information referenced in section 7.7.7 should also include the Southwark Historic Assets Register, as published on the website and including the linked Historic England databases, and the applicant's own assessment of any historic structures on the site.*"	This comment relates to the Heritage Assessment, not the TVIA which considers effects on townscape receptors and people's views and visual amenity. See Heritage response.
Para 40 (2017): "*The scope of assessment, as defined in 7.7.11, should include a further criterion to explicitly reference the potential effect(s) on designated heritage assets. Further to this, Section 7.7.16 should include a linked criterion to stating: "key viewpoints where the setting of a designated heritage asset is appreciated*".	This comment relates to the Heritage Assessment, not a the TVIA. The TVIA considers effects on townscape features, character and people's views and visual amenity. See the Heritage response.
Para 41 (2017) and Para 49 (2018): regarding Section 7.7.17 (of the 2017 Scoping Report) and Section 7.7.20 (of the 2018 Scoping Report) "*…should include the Thorburn Square Conservation Area as a potential visual receptor …*"	Thorburn Square is identified as a scoped-out viewpoint (Table 7.3 in the Scoping Report) for the TVIA, following previous viewshed analysis for maximum of 140m height proposed development. At 147m maximum height of proposed development at Malt Street, there remains to be barely any ground level viewshed and therefore we have determined that there would not be significant visual effects from the ground level at Thorburn Square. 

Para 41 (2017) and Para 49 (2018): regarding Section 7.7.17 (of the 2017 Scoping Report) and Section 7.7.20 (of the 2018 Scoping Report) "*…...and the following listed buildings: Caroline Gardens Almshouses comprising a large group of Grade II listed buildings including the Licensed Victualler's Chapel; 1-50 Clifton Crescent; 2-7 Canal Grove; Livesey Museum, Old Kent Road; Grade II listed group on Glengall Road; Grade II listed group on Trafalgar Avenue; Grade II listed group on Cobourg Road*."	These receptors as Listed Buildings are for Heritage assessment, not for inclusion in the TVIA. Nevertheless, visual assessment and AVRs have been provided to demonstrate the visual effects upon visual receptors on the publicly accessible streets or spaces adjacent to The Former Licensed Victualler's Chapel; the Livesey Museum (rear as no view from the front); and from Glengall Road. See the Heritage response.
Para 42 (2017): "*The listed views (in Table 7.3) have been generally scoped and are based on the initial proposals that were reviewed by officers in August 2016, though the results of this views analysis is yet to be presented to officers. However, the indicative description of development presented at this stage suggests a potentially significant increase in the scale of development proposed and, as a consequence, further views may be necessary*."	Table 7.3 in the Scoping Report contains the scoped-out views / viewpoints. We assume that the comment is made with regards to a change in the increase in scheme size relates to a tall building 120m height that was considered when we presented the viewpoint selection report in August 2016, and that now the scheme's tallest building is 147m height. We have reviewed the 147m height tall building through a 2018 ZTV plan and the 2018 visual impact assessment which utilises AVRs (verified view visualisations) prepared by Rockhunter. We consider that the scoped-out viewpoints and views as set out in Table 7.3 remain appropriate. It was established that the 2018 Application Scheme falls outside the boundary of the London View Management Framework (LVMF) views (Background Wider Setting Consultation Area), however Rockhunter prepared AVRs for views from LVMF 2A.1 Parliament Hill (10.58km from the Application Site) and 3A.1 Kenwood House (11.9km from the Application Site) to demonstrate the effects of the development on these views requested by Historic England. These are included in the AVR set at Appendix 12.5 Part 2 and included in the assessment of visual effects as VP19 and VP20 in the TVIA. See the Heritage response.
Para 50 (2018): "*The listed views (in Table 7.4) have been generally scoped and are based on the initial proposals that were reviewed by officers in August 2016. However, in line with the response from Historic England, the LVMF views from Parliament Hill and Kenwood House towards Central London LVMF Views 2 and 3) should be provided. Historic England state that they expect the Environmental Statement to contain a thorough assessment of the likely effects which the proposed development might have upon those elements which contribute to the significance of these assets. In addition, further views may be required and accordingly requested to respond to any appropriate requests arising from consultation*."	
Para 43 (2017): "*It is acknowledged that the Zone of Theoretical Visual Influence (ZTV) for the proposal is to be established to inform the wider Townscape Visual Impact Assessment. Once the development has reached the 'design freeze' stage, the council will require a scaled 3D model to assist in understanding the visual impacts of the proposal within its context, including its potential cumulative impacts with other major developments in the vicinity*."	The ZTV plan is included in the TVIA supporting plans and has been updated in response to the 2018 Application Scheme. The ZTV plan, together with the AVRs (visualisations) by Rockhunter have informed the visual impact assessment for the TVIA. The 3D model is not part of the TVIA, though it has of course been used in Rockhunter's visualisations which we have used to inform the visual impact assessment.
Para 44 (2017) and Para 51 (2018): *"The ES should acknowledge that the impact of the proposal needs to be considered cumulatively together with any other consented schemes as well as both the maximum and minimum parameters that*	The TVIA includes a cumulative assessment section in accordance with the project's ES structure.

will be established as part of the outline element"	
Para 51 (2018): "*It is recommended that the ES present the information as i) existing view, ii) proposed view and iii) cumulative view."*	The 2018 AVRs prepared by Rockhunter are presented as such.
Para 45: "*It is important that the primary mitigation measures referenced in Section 7.7.49* [**2017 Scoping Report, Section 7.7.3 of the 2018 Scoping Report**] *should include adjustment(s) in height, scale, massing and/or arrangement of the proposed development through an iterative process in order to avoid harmful impacts on designated heritage assets and their settings."*	The Planning Statement sets out the iterative design process. The Planning Statement, the Design Principles Document, the DAS and the Parameter Plans set out the design approach to the proposed development. The iterative design process forms part of the primary (embedded) mitigation text in the TVIA. See the Heritage response.
Comments on 2017 Application	
Historic England *We note that the Area Action Plan for the Old Kent Road remains at draft stage. As expressed as scoping stage, we continue to recommend that any tall building proposal within the Old Kent Road area is informed by a clear strategy, taking into consideration the existing townscape character and its heritage interest, to prevent development which could cause serious harm to the historic environment across the Borough and beyond. Historic England is therefore disappointed that these proposals have been submitted in advance of any adopted policy for development within this part of Southwark.* *Nonetheless, taking this hybrid application into consideration on its own merits, we would conclude that the proposed development would cause a significant amount of harm to the conservation areas and listed buildings set out in this letter. Whist we do not consider the level of harm to any individual designated heritage asset to be 'substantial' in NPPF terms, the cumulative impact of the development on the wide range of designations in the vicinity is of much concern to Historic England.* *Regarding the proposed tower subject to detailed planning permission, the supporting visual information indicates that it would appear relatively isolated in a number of key views, and would therefore not appear to form a coherent part of the proposed masterplan development. It is important to note that in all three views in which we have identified harm, the impact of the proposed masterplan development represents a significant departure from the more modest scale of the Old Kent Road Local Development Study massing (outlined in green). This apparent lack*	The proposal has been developed with regard to the current version of The Old Kent Road Area Action Plan / Opportunity Area Framework (Further Preferred Option, Dec 2017). Preferred option Policy AAP8 considers tall buildings over 30m '*appropriate within the core area'*, The policy requires the location of tall buildings to reinforce hierarchy of streets and spaces, and the provision of public space at ground level which is '*proportionate to the height of the building*'. The policy states: '*Proposals for tall buildings should demonstrate a considered relationship with other tall buildings and building heights in the immediate context and contribute towards creating a coherent, legible and well-articulated townscape. Cumulatively, tall buildings should not coalesce visually to form a single mass… 'In addition, tall buildings which are significantly higher than the existing contextual height of tall buildings (around 20 storeys) must demonstrate that they contribute positively to London's skyline, when viewed locally and in wider views and that they make an exceptional contribution to the regeneration of the area.*'

of a coherent masterplan, and departure from the emerging strategy, is of much concern to us. *In our view, this scheme fails to preserve both the setting of the listed buildings and the character of the conservation areas identified in this letter, and we therefore recommend that this application is refused.*	

2.2 Potential Effects

2.2.1 Potential townscape and visual effects arising from the proposed development are those upon:

a. Townscape features;

b. Townscape character; and

c. People's views and visual amenity.

2.3 Selection of Representative Viewpoint Locations for Visual Impact Assessment and Consultation

2.3.1 Published information regarding Borough and local views, such as Conservation Area Appraisals and townscape character studies, were reviewed to assist in identification of sensitive visual receptors, local key views, locally important landmarks/skyline features and features of historic or townscape significance.

2.3.2 In addition, the potential visual influence of the proposed development was reviewed using the viewshed analysis on Google Earth Pro. This indicated the theoretical extent to which the proposed development is likely to be visible from within the surrounding area. Together with a walkover visit, and quick camera match information from Rockhunter, the resultant information guided the initial selection of representative viewpoints for inclusion within the 2017 Application visual impact assessment. For the 2018 application, a maximum height of 147m has been applied as a target point on the Zone of Theoretical Visibility Plan (ZTV), at the location of proposed tall building: B4 and has been tested in Rockhunter's Accurate Visual Representations. It is important to note that in reality, there is likely to be further filtering of views from the street level, by trees or buildings. View locations from the 2017 Application were used for the 2018 Application.

2.3.3 The original proposed viewpoint selection for the TVIA was set out in a short report, issued to London Borough of Southwark and discussed at a pre-application meeting on 12th August, 2016. The locations of the initial proposed viewpoints were reviewed at that meeting, with minor amendments to locations made at the request of LBS; together with LBS requests for winter testing to specified viewpoints, in addition to summer assessment. At that meeting, viewpoints which were scoped out were also agreed (see **Table 2.3**).

2.3.4 **Table 2.2** below, sets out the resultant agreed viewpoints for inclusion within the visual impact assessment of the 2017 Application TVIA, alongside the specific for reasons their selection and the agreed method of visual representation. The proposed viewpoint locations are representative of publicly available views within the urban area, including those from public open spaces, or adjacent to sensitive receptor property groupings or other buildings. Visual receptors at the proposed viewpoint locations have potential to experience significant visual effects as a result of the proposed development.

Table 2.2: Selection of Representative Viewpoints for Visual Impact Assessment

Viewpoint Reference	Location	Reason for Inclusion	Comments
VP1	Leyton Square	Public open space	Winter testing in visual effects table. AVR (photomontage) provided
VP2	Neate Street / Cricket Club	Route; and adjacent to public open space	Winter testing in visual effects table. AVR (photomontage) provided
VP3	Burgess Park (at the Lake Edge)	Major area of public open space, built as a result of the Abecrombie Plan for open spaces in 1943	Wireframe provided
VP4	Old Kent Road/Olmar Street junction	Main route	AVR (photomontage) provided
VP5	Queen Victoria Public House, Southward Park Road	Historic feature of local character and townscape significance, main route	Winter testing in visual effects table in and in wireframe provided
VP6	Southern Railway Stables (at Old Forge entrance)	Historic feature of local character and townscape significance, main route	Wireframe provided
VP7	Glengall Terrace	Conservation Area, NCN (looking eastwards)	AVR (photomontage) provided
VP8	Old Kent Road / Ledbury Estate	Local notable landmarks on skyline, character significance	Winter testing in visual effects table and in wireframe provided.
VP9	Former Licensed Victuallers Asylum (from Courtyard facing over the building)	Conservation Area, major local historic complex, Grade II Listed Buildings	Winter testing in visual effects table. AVR (photomontage) provided.
VP10	Opposite Former North Peckham Visitor Centre	Local landmark and building of architectural interest	AVR (photomontage) provided.
VP11	Rear of former Livesey Museum	Listed Building, local landmark, POS play area	Wireframe provided.
VP12	Fire Station, from Old Kent Road, near to Thomas a Becket Public House and	Local historic feature and landmark building	Winter testing in visual effects table and in wireframe provided.
VP13	Surrey Canal Path	POS, linear route (footpath)	Winter testing in visual effects table. AVR (photomontage) provided.
VP14	South Bermondsey Station Platform	Railway and platform is elevated, provides panoramic view from south to north including the London Skyline.	Wireframe provided.
VP15 (DM17:1)	Panoramic north facing view from One Tree Hill	Important Borough view, policy DM17 of New Southwark Plan Preferred Option	Wireframe provided.
VP16 (DM17:2)	View of St. Pauls Cathedral from Nunhead Cemetery	Important Borough view, policy DM17 of New Southwark Plan Preferred Option	No view, but wireframe provided to demonstrate.

Viewpoint Reference	Location	Reason for Inclusion	Comments
VP17	Ossory Road / Old Kent Road junction	Included at LPA request (pre-application meeting 12th August, 2016)	Wireframe provided.
VP18	Southwark Park public open space (east side, northwest of the running track)	Included at LPA request (pre-application meeting 12th August, 2016)	Winter testing in visual effects table. Wireframe provided.
VP19	LVMF 3A.1 Kenwood House	Requested by Historic England	Long distance panorama, wireframe provided.
VP20	LVMF 2A.1 Parliament Hill	Requested by Historic England	Long distance panorama, wireframe provided.

2.3.5 Where there are potentially sensitive visual receptors, but where visual effects arising from the proposed development are not anticipated to be significant, for example due to intervening buildings, these locations were scoped out for the visual impact assessment in the TVIA, and are as agreed with LBS at the pre-application meeting on 12th August 2016. These are set out in Table 2.3 below.

Table: 2.3 Scoped Out Viewpoints

Viewpoint Location	Reasoning for Scoping Out
Nile Terrace, Trafalgar Avenue (length between Old Kent Road and Glengall Terrace)	No or few street views
View along Southwark Park Road / from Railway Bridge brick arches	Unlikely to have views from street level
Thorburn Square	Unlikely to have views from street level
New Fire Station on Old Kent Road, Southwark Park Primary School	No or few street views
Channelled view of gasholders looking north (local key view)	Direction of view away from site
View north west beyond the area along Old Kent Road towards Thomas a Becket public house (local key view)	Direction of view away from site
Ilderton Road Primary School, street view from 3no. 20 storey towers at Tustin Estate, gas holders	No or few street views
Stave Hill Ecological Park	Distance from site; and committed development including tall buildings adjacent to the park will shorten and prevent views to the site. Agreed to be scoped out at pre-application meeting on 12th August, 2016.

Viewpoint Location	Reasoning for Scoping Out
Important Borough View (DM17: 3) View of St Pauls Cathedral along Camberwell Road	Key borough view direction is northwards. Site lies to the east.
Important Borough View (DM17: 3) View of Tower Bridge from Kings Stairs Gardens	Key borough view direction is northwest. Site lies to the southwest.
Important Borough View (DM17: 3) View south from the centre of Millennium Bridge	No view
Important Borough View (DM17: 3) View of St Pauls Cathedral along Great Guildford Street	Key borough view direction is northwards. Site lies to the south-southeast.

3 Methodology

3.1 Zone of Theoretical Visibility

3.1.1 A computer-generated Zone of Theoretical Visibility plan (ZTV) was created, which established the theoretical extent to which the proposed development is likely to be visible in the surrounding urban area, up to a limit of 2.5km, based upon the final parameter plans. The proposed development height information was provided by the project architect. Beyond this limit, professional experience of other assessments and site appraisals for this type of development has shown that townscape or visual effects would not be significant.

3.1.2 The ZTV computer software processes LiDAR data, to identify the theoretical extent of the area from which the proposed development is likely to be visible. It is important to note that the ZTV illustrates the worst-case scenario, in reality other built form and other features, such as hedgerows or street trees, are likely to provide additional filtering or reduction of views.

3.2 Baseline Data for the Townscape and Visual Assessment

3.2.1 Background data was collected and reviewed to establish the baseline townscape and townscape character information, including topography, townscape planning designations and published sources of townscape character or, where relevant, landscape character.

3.2.2 Sources of information included:

- Ordnance Survey OpenData for mapping;
- Google Earth Pro for aerial photography;
- www.magic.defra.gov.uk for designations;
- London Borough of Southwark for relevant local plan documents and planning policies, and the Old Kent Road Characterisation Study for townscape character areas; and
- Natural England for national and London landscape character areas.

3.3 Site Appraisal and Photographic Record

3.3.1 The site and surrounding area was visited, in order to:

a. Determine the extent of visibility of existing built structures;

b. Determine the visibility of the proposed development, utilising the results from the ZTV plan to guide the field work;

c. Gain further understanding of the urban components which create the townscape character; and

d. Carry out the assessment of townscape and visual effects.

3.3.2 Rockhunter have undertaken a baseline photographic record to represent existing views from the selected assessment viewpoints. These are included as baseline views for the AVR visuals, in Appendix 11.5 of the TVIA chapter of the ES.

3.4 Assessment Stages

3.4.1 A three-stage assessment process is adopted for the Townscape and Visual Impact Assessment, in accordance with the Landscape Institute/Institute of Environmental Management and Assessment guidelines. Firstly, the nature of receptors (sensitivity) is assessed. Secondly the nature of effects (magnitude) likely to result from the proposed development is assessed. Lastly, the significance of the identified townscape and visual effects on receptors is assessed, as required by the European Union Directive 2011/92/EU and UK Country Regulations.

3.5 Duration of Effects

3.5.1 Effects may be temporary, permanent or reversible over time. The following terminology is used in the TVIA, to describe the duration of townscape and visual effects arising as a result of the development proposals:

a. Short term: less than 5 years' duration;

b. Long term: longer than 15 years' duration.

3.6 Nature of Effects

3.6.1 The nature of effects may be positive (beneficial) or negative (adverse) and direct or indirect.

3.6.2 Positive effects have a beneficial influence on the receptor (enhancement); alternatively, negative effects have an adverse influence on the receptor (degradation).

3.6.3 It is possible that the nature of an effect may be neutral, where proposals result in a change to the receptor, but that change, on balance, is considered to be in keeping with the receptor such that the baseline situation is maintained and does not lead to either enhancement or degradation of that baseline.

3.6.4 Direct effects are those which result directly from the development; whereas indirect, or secondary, effects may arise as a consequential change resulting from the development, for example: changes to offsite and downstream vegetation as a result of alterations to a drainage regime.

3.7 Assessment of Townscape Effects

3.7.1 This assesses how the proposed development will affect the components of the urban environment (the 'townscape fabric', for example: land use, scale, street trees, street pattern and layout, urban grain and massing, legibility, public realm and appearance), and the key characteristics which contribute to its distinctive character (the 'townscape character').

3.7.2 A methodical consideration of each effect upon each identified townscape receptor is undertaken, in order to determine the significance of effects, in terms of:

a. Value and susceptibility to change (sensitivity of the townscape receptor); and

b. Size / scale, extent, duration and reversibility (magnitude of the townscape effect).

Sensitivity of Townscape Receptors

3.7.3 The assessment of townscape receptor sensitivity combines judgements on the value attributed to the townscape receptor and the 'susceptibility to change' of the receptor to the specific type of development proposed. For example, a townscape with consistent, intact and

well-defined, distinctive attributes is generally considered to be of higher quality, value and sensitivity, than a townscape where the presence of inappropriate or discordant elements are detractors within its inherent character.

3.7.4 The value of potentially affected townscape receptors is assessed, including townscape character and the individual elements or features which contribute to that townscape character. Townscapes may be valued at community, local, national on international levels. Existing townscape designations are taken as the starting point for the assessment, and the value of undesignated townscapes is also assessed.

3.7.5 Table 3.1 sets out the relative importance of generic townscape designations and descriptions, identifying those designations applicable to the site and study area in the third column.

Table 3.1: Townscape Designations

Typical Designation and Importance (Value)	Description	Actual Designation Applicable to the site and Surrounding Area
World Heritage Site: International (High) ***Within 1 km of site***	Unique sites, features or areas of international importance with settings of very high quality.	**None.**
Conservation Areas, curtilage of Grade I, II* and II Listed Buildings: National (High). ***Within 500 m of site***	Sites, features or areas of national importance with settings of high quality.	**<u>Conservation Areas</u>** **Glengall Road, CA 8,** 0.1 km NW of site**.** **Trafalgar Avenue, CA 18,** 0.3 km NW of site**.** **Coburg Road, CA 19,** 0.4 km NW of site**.** **Peckham Hill Street, CA 43,** 0.3 km SW of site**.** **<u>Listed Buildings</u>** **Grade II listed buildings within CA 8 and closest to the site:** No.1-35 Glengall Rd, 0.2 km NW of site. **Grade II Listed Buildings outside of CA:** **2&3 Canal Grove,** 0.2 km NE of site. **Celestial Church of Christ,** 0.2km SE of site. **Eveline Lowe School,** 0.3 km NE of site. **Church of Our Lady of Seven Colours,** 0.3 km SE of site. **108-124 Peckham Park** Road, 0.3 km SE of site. **80-98 Furley Road,** 0.5 km SE of site.
Registered Parks and Gardens of Special Historic Interest, Scheduled Monuments: National (High).		**None.**

Typical Designation and Importance (Value)	Description	Actual Designation Applicable to the site and Surrounding Area
Within 1km of site		
Long distance footpaths: Regional (High/ Medium) ***Within 5 km of site***	Sites, features or areas of regional importance with intact character.	**Thames Path,** 5 km N of site.
Designated Public Open Space ***Within 1 km of site*** Tree Preservation Orders (TPO)	**Burgess Park:** large recreational park. **Surrey Canal Walk:** Linear Park **Leyton Square:** recreation ground within Friary Estate. **Bird in Bush Park:** pocket park. **Patterson Park:** small park with play area and MUGA. **Surrey Square:** pocket park. **Patterson Park:** small park with play area and MUGA. **Surrey Square:** pocket park.	**Burgess Park,** 0.1 km W of site. **Surrey Canal Walk,** 0.1 km W of site. **Leyton Square,** 40 m S of site. **Bird in Bush Park,** 0.4 km SE of site. **Patterson Park,** 0.6 km NE of site. **Surrey Square,** 0.9 km NW of site. There are no TPOs within the site or adjacent to the site boundary.
London and National Cycle Routes ***Within 1 km of site***	Cycle route from Brockley Way to London Bridge	**LCN Route 65,** 0.2 km NW of site.

3.7.6 Other factors which may influence townscape value are set out in Table 3.2:

Table 3.2: Factors Which Influence Townscape Value

Attribute	Criteria
Townscape Quality	Intactness or physical condition of the urban environment or of the individual elements which contribute to townscape character.
Sense of Place	Aesthetic and perceptual qualities which create distinctiveness.
Scenic Quality	General appeal of the urban environment to the senses.
Rarity	Rarity of townscape character areas, types or features.
Representativeness	Particular characteristic/feature/element considered an important example.
Cultural Interest	The presence of wildlife or cultural heritage interest which contributes positively to the townscape.
Recreation Value	Evidence that the townscape experience forms an important part of recreational activity, e.g. as established in guidebooks.
Associations	Relevant associations with notable figures, such as writers or artists, or events in history that contribute to townscape value.

3.7.7 Where appropriate, key individual components of the townscape, including particular townscape features, notable aesthetic and perceptual qualities, are considered in terms of importance in their own right, including whether or not they can realistically be replaced. They may also be judged on their contribution to the overall character and value of the wider townscape. For example, a Georgian terrace may have high value in its own right, but also be important because it forms part of a vista which contributes significantly to the townscape character.

3.7.8 The susceptibility of townscape receptors to change arising from the proposed development is based upon the following criteria in Table 3.3:

Table 3.3: Townscape Receptor Susceptibility to Change

Susceptibility	Criteria
High	Little ability to accommodate the proposed development without undue consequences for the maintenance of the baseline townscape and/or the achievement of townscape planning policies and strategies.
Medium	Some ability to accommodate the proposed development without undue consequences for the maintenance of the baseline townscape and/or the achievement of townscape planning policies and strategies.
Low	Substantial ability to accommodate the proposed development without undue consequences for the maintenance of the baseline townscape and/or the achievement of townscape planning policies and strategies.

3.7.9 An overall assessment of sensitivity will be made for each townscape receptor, based on a combined judgement of the above criteria, using following typical scales:

Table 3.4: Townscape Sensitivity

Townscape Sensitivity	Description
High	An area possessing a particularly distinctive sense of place and character, and / or attributes which make a particular contribution to the townscape or townscape character, for example: • in good condition; • highly valued for its scenic quality; • highly valued for its townscape character; • an area with a low tolerance to change of the type proposed; • an area with high quality materials in the public realm; • cultural heritage features or walks with cultural associations; • valued for contribution to recreational activity; • important cultural or historic associations; • irreplaceable features or character; • part of a long distance footpath.
Medium	An area with a clearly defined sense of place and character, and / or attributes which contribute to the townscape or townscape character, such as: • in moderate condition; • some scenic quality valued at a local or regional level; • townscape character intact and valued at a local or regional level; • an area with partial tolerance to change of the type proposed; • may be undesignated townscape.

Low	An area with a weak sense of place or poorly defined character, and / or attributes which make a contribution to the townscape or townscape character, such as: • in poor condition; • no particular scenic qualities; • disjointed townscape character; • contains a high level of discordant features; • no cultural interest; • an area that is tolerant of substantial change of the type proposed; • undesignated townscape; • a degraded townscape; • strongly influenced by detracting land uses and buildings.

Magnitude of Townscape Effects

3.7.10 This assessment is based on the scale and massing of the proposed development and the consequential effects upon townscape elements and townscape character.

3.7.11 The magnitude of a townscape effect is assessed in terms of its size or scale, the geographical extent of the area influenced and its duration and degree of reversibility.

3.7.12 The size or scale of change in the townscape relates to the loss or addition of features in the townscape which are likely to result from the proposed development, and takes into account:

a. The extent/proportion of townscape elements that are lost or added;

b. The contribution of those elements to townscape character and the degree to which aesthetic/perceptual aspects are altered; and

c. Whether the effect is likely to change the key characteristics of the townscape, which are critical to its distinctive character.

3.7.13 The following criteria are used to assess the magnitude of change of townscape effects, based on the degree of change that will occur as a result of the proposed development and in relation to the nature of the effect:

Table 3.5: Townscape Effects: Magnitude of Change and Nature of Effect

Category	Criteria
Major adverse townscape effect	The proposals will result in a total change in the key characteristics of townscape character; will introduce elements totally uncharacteristic to the attributes of the receiving townscape such as its massing, scale, pattern and features; and/or will destroy or permanently degrade the integrity of townscape character; or is in total conflict with established planning objectives for townscape and visual elements of regeneration and enhancement of the urban environment; and/or result in a substantial or total loss, or alteration of key elements/features/characteristics.
Moderate adverse townscape effect	The proposals will result in a partial change in the key characteristics of townscape character; will introduce elements uncharacteristic to, out of scale or at odds with the attributes of the receiving townscape, such as its massing, scale, pattern and features; and/or will result in partial loss, or alteration of key elements/features/characteristics; or is in conflict with established planning objectives for townscape and visual elements of regeneration and enhancement of the urban environment.

Category	Criteria
Slight adverse townscape effect	The proposals will result in little change in the key characteristics of townscape character and will introduce elements that do not quite fit with the attributes of the receiving townscape such as its massing, scale, pattern and features; and/or will result in a minor loss or alteration of elements/features/characteristics; and/or contribute to degrading the townscape character.
Negligible adverse townscape effect	The proposals will result in a just discernible change to townscape character/elements/features/characteristics, which is not quite in keeping with the existing townscape and townscape character.
No change	The proposals will not cause any change to the townscape character/elements/features/characteristics.
Neutral effect	As a result of the proposals, there will be a change to the townscape elements/features/characteristics, but the change will be in keeping with, and complement, the existing townscape character such that the existing character is maintained and does not cause degradation or enhancement of the character.
Negligible townscape benefit	The proposals will result in a just discernible improvement to the townscape character/elements/characteristics, such as massing, scale, pattern or features.
Slight townscape benefit	The proposals will achieve a degree of fit with the townscape character/elements/features/characteristics and provides some enhancement to the condition or character of the townscape.
Moderate townscape benefit	The proposals will achieve a good fit with the townscape character/elements/features/characteristics, such as massing, scale, and pattern; or would noticeably improve the condition or character of the townscape and enhance characteristic features through the use of local materials; and/or support established planning objectives for townscape and visual elements of regeneration and enhancement of the urban environment.
Major townscape benefit	The proposals will totally accord with the townscape character/elements/features/characteristics, including scale, pattern, massing; or would restore, recreate or permanently enhance the condition or character of the townscape and enhance characteristic features through the use of local materials; and/or delivers established planning objectives for townscape and visual elements of regeneration and enhancement of the urban environment.

3.8 Assessment of Effects on Views and Visual Amenity

3.8.1 This assesses how the proposed development will affect the views available to people and their visual amenity. A methodical consideration of each visual effect upon each identified visual receptor is undertaken, in order to determine the significance of effects, in terms of:

a. Value and susceptibility to change (sensitivity of the visual receptor, or viewer); and

b. Size / scale, extent, composition, duration and reversibility (magnitude of the visual effect).

3.8.2 Visual receptors generally comprise users of public rights of way, public open spaces, public realm or other outdoor recreational facilities, and also travellers in vehicles who may be visiting, living or working within the study area, and their views at particular places.

3.8.3 The following terminology will be used to describe the approximate distance between the representative viewpoint and the proposed development:

a. Local: under 0.5km;

b. Medium distance: 0.5km – 2km;

c. Long distance: beyond 2km.

3.8.4 The type of view, and the number of viewers likely to experience the view, will be described in the following terms:

a. Glimpsed (i.e. in passing) / Filtered / Oblique / Framed / Open Views; and

b. Few / Moderate / Many Viewers.

3.8.5 No private viewpoints are assessed. However, where appropriate, representative viewpoints are selected from publicly accessible locations within or on the edge of main settlements, property groupings or other buildings likely to be significantly affected by the proposed development.

Sensitivity of Visual Receptors

3.8.6 The assessment of visual receptor sensitivity combines judgements on the value attributed to the visual receptor and the 'susceptibility to change' of the receptor to the specific type of development proposed.

3.8.7 The value assigned to views will have regard to a number of factors, including:

a. Recognition through planning or heritage assets; and

b. The popularity of the viewpoint, its appearance in guidebooks, literature or art, on tourist maps, and the facilities provided to enable enjoyment of the view.

3.8.8 The criteria for the assessment of the value of views is summarised in the table below; note that these are provided for guidance and are not intended to be absolute.

Table 3.6: Value of Views

Value	Criteria
High	Views from townscapes/viewpoints of national importance, or highly popular visitor attractions where the view forms an important part of the experience, or with important cultural associations.
Medium	Views from townscapes/viewpoints of regional/district importance or moderately popular visitor attractions where the view forms part of the experience, or with local cultural associations.
Low	Views from townscapes/viewpoints with no designations, not particularly popular as a viewpoint and with minimal or no cultural associations.

3.8.9 The susceptibility of people to changes in views is a function of:

a. The occupation or activity of the viewer at a given location; and

b. The extent to which a person's attention or interest may therefore be focussed on a particular view and the visual amenity experienced.

3.8.10 For the purposes of the visual impact assessment, visual receptors' susceptibility to change will be based upon the following table:

Table 3.7: Visual Receptors' Susceptibility to Change

Susceptibility	Type of Receptor
High	- Residents; - People engaged in outdoor recreation, including users of public rights of way, whose attention is likely to be focussed on the visual environment of the townscape and on particular views; - Visitors to heritage assets, landmarks or other attractions where views of the surroundings are an important part of the experience; - Communities where views contribute to the townscape setting enjoyed by residents; and - Travellers on scenic routes.
Medium	- Travellers on road, rail or other transport routes, where the view is moderately important to the quality of the journey; - People using local parks, open spaces, public realm, or walking on streets or local public rights of way, with moderate interest in their visual environment.
Low	- People engaged in outdoor sport or recreation, which does not involve appreciation of, or focus upon, views; - People at their place of work, where the townscape setting is not important to the quality of working life; and - Travellers, where the view is fleeting and incidental to the journey.

3.8.11 An overall assessment of visual sensitivity is made for each representative viewpoint, based on a combined judgement of the above criteria, using following typical scales:

Table 3.8: Visual Sensitivity

Visual Sensitivity	Description
High	The view is likely to an internationally, nationally or regionally important or protected view. The view or its composition may: • Include landmark features; • Have high amenity value; • Be of an attractive composition and contain elements of notable visual interest; • Be enjoyed by a large number of recreational users and visitors; • Be experienced by residents; • Include views of important heritage assets, such as World Heritage Sites or Listed Buildings or Registered Historic Parks and Gardens; • By a publicised view in guidebooks; • Be a 'designed' view, such as a designed vista in an historic townscape.
Medium	The view is likely to be a locally designated view or undesignated. The view or its composition may: • Include some features of value or interest; • Be incidental or intentional to the viewer, with some amenity value; • Be of a generally attractive composition with little sign of neglect or degradation; • Provide views of heritage assets, but which are not best represented by the particular view; • Be from within local parks or open space, the public realm, streets or on local public rights of way.
Low	The view is likely to be undesignated. The view or its composition may: • Not include any landmark features; • Have low amenity value;

	• Have few or no elements which are visually attractive, and have a weak or poor composition with discordant or incongruous features that may contribute to a sense of degradation or poor quality; • Be incidental to the viewer, with little or no amenity value; • Be fleeting to a viewer in motion.

The Nature of Visual Effects in the Urban Environment

3.8.12 For the purpose of this TVIA, **beneficial** visual changes which arise as a result of proposed development may include, but are not limited to, the following factors:

- Creation of a new focal point and interest to the view, composition, built skyline and / or linear built form, e.g. a varied and dynamic roof-scape;
- The proposed development appropriately leads the eye along the street, or away from existing visual detractors or features which provide poor visual composition at the baseline;
- Opens up views;
- Provision of a distinctive landmark or gateway and visual orientation, particularly where the baseline view lacks distinguishing built form on the skyline;
- Respects the existing townscape / streetscape views, e.g. views along arcing streets;
- Provides variation to elevational built form;
- Respects existing adjacent built form, e.g. by the use of stepped elevations;
- Provision of positive variation to scale and form in the composition of the view, which may be in accordance with local regeneration policies;
- Creation of views of new public realm areas;
- Creation of a strong visual identity to the townscape; and
- Creation of vistas towards new focal points.

3.8.13 Visual changes which are considered to be **adverse** may include, but are not limited to, the following factors:

- Amplification of existing adverse visual effects;
- Creation of visual complexity and discordant elements;
- The development proposals create contrast which results in a confusing image or which distracts from the existing focus of the view where the baseline focus is attractive and pleasant;
- The development proposals are completely out of scale or mass with adjacent built form such that they dominate the adjacent area and do not relate to or address the issue of scale;
- The development proposals are of a much greater scale than adjacent built form, however the design seeks to address the adjacent built form, context and scale;

- The resulting change to the view is such that the appreciation of the existing built form is diminished or lost;
- Leads to loss of views or vistas;
- Development proposals negatively draw attention to the proposal, and away from baseline visually attractive features or composition.

3.8.14 Professional experience has shown that, in most cases, proposed development in urban environments is likely to result in various beneficial and adverse visual effects. Therefore, this TVIA takes the approach of setting out specific beneficial and adverse visual effects upon each of the viewpoints in the Visual Effects Table, with a balanced view being taken to determine whether the overall nature of effect is **adverse** or **beneficial**.

Magnitude of Visual Effects

3.8.15 The magnitude of a visual effect is assessed in terms of its size or scale, the geographical extent of the area influenced and its duration and degree of reversibility.

3.8.16 The size or scale of change in the view relates to the degree of contrast to, or integration with, the visual composition, which is likely to result from the proposed development; and is influenced by the relative time over which a view is experienced, and whether it is a full, partial or glimpsed view.

3.8.17 The following criteria are used to assess the size and scale of visual effects, based on the degree of change to the view or composition:

Table 3.9: Visual Effects: Magnitude of Change

Category	Criteria
Major adverse or beneficial visual effect	The proposals will cause a dominant or complete change or contrast to the view, resulting from the loss or addition of features in the view and will substantially alter (degrade or enhance) the appreciation or composition of the view.
Moderate adverse or beneficial visual effect	The proposals will cause a clearly noticeable change or contrast to the view, which would have some effect on the composition, resulting from the loss or addition of features in the view and will noticeably alter (degrade or enhance) the appreciation of the view.
Slight adverse or beneficial visual effect	The proposals will cause a perceptible change or contrast to the view, but which would not materially affect the composition or the appreciation of the view.
Negligible adverse or beneficial visual effect	The proposals will cause a barely perceptible change or contrast to the view, which would not affect the composition or the appreciation of the view.
No change	The proposals will maintain the existing view and cause no change to that view.
Neutral	There will be a change to the composition of the view, but the change will be entirely in keeping with the existing elements of the view and maintain the composition and quality of the existing baseline view and does not enhance or degrade the baseline view.

3.9 Cumulative Townscape and Visual Effects

3.9.1 Definition of cumulative landscape and visual effects was first set out in the 2002 edition of the Guidelines for Landscape and Visual Impact Assessment, and since then has been further refined, in terms of windfarm development, by guidance produced in Scotland, which is used widely and not only in Scotland. The current definitions, as set out in 'Assessing the Cumulative Impact of Onshore Wind Energy Developments', Scottish Natural Heritage (SNH),

2011, are referred to in paragraph 7.3 of the Guidelines for Landscape and Visual Impact Assessment, Third Edition, 2013 (Landscape Institute and IEMA), (GLVIA3) and comprise:

- **Cumulative effects** - 'the additional changes caused by an 2018 Application Scheme in conjunction with other similar developments or as the combined effect of a set of developments, taken together';
- **Cumulative visual effects** - effects caused by combined visibility, which 'occurs where the observer is able to see two or more developments from one viewpoint' and/or sequential effects which 'occur when the observer has to move to another viewpoint to see different developments'; and
- **Cumulative landscape/townscape effects** - effects that 'can impact on either the physical fabric or character of the landscape, or any special values attached to it'.

3.9.2 In accordance with the emphasis in EIA, the assessment is required to focus on the cumulative townscape and visual effects which are **likely to be significant**, rather than providing a comprehensive listing of every conceivable cumulative townscape and visual effect that might occur. The approach must be reasonable and proportional to the 2018 Application Scheme.

3.10 Townscape and Visual Mitigation Measures

3.10.1 Measures proposed for preventing/avoiding, reducing or, where possible, offsetting or compensating for significant adverse townscape or visual effects are described. Mitigation measures may comprise:

a. Embedded or primary measures – developed through the iterative design process, and which have become integrated or embedded into the project/scheme design, such as site layout, retention of existing trees, use of vernacular materials or appropriate form, detailed design, colours and finishes, new street tree planting or incorporation of key views and vistas;

b. Standard construction and operational management practices – for avoiding and reducing environmental effects, such as hoardings around buildings or tree protection fencing; and

c. Further, or secondary measures – proposals to address residual adverse effects which remain after primary measures and standard construction practices have been incorporated into the scheme.

3.10.2 Embedded mitigation measures and standard construction and operational management practices will be described in the project description and also the separate Design and Access Statement.

3.10.3 Further mitigation measures, if they are required, are described in the TVIA.

3.11 Assessment of Significance of Townscape and Visual Effects

3.11.1 Significance of townscape and visual effects vary with the location, townscape context and type of proposed development.

3.11.2 The level of significance of townscape and visual effects is determined from a combination of the receptor sensitivity and the magnitude of effects, as set out in Table 3.10. Minor and negligible levels of significance are identified as ‘not significant’ in EIA terms.

Table 3.10: Significance Levels of Townscape and Visual Effects

Sensitivity of Receptor	Magnitude of Effect				
	Major Effect	Moderate Effect	Slight Effect	Negligible Effect	Neutral Effect
High	**Substantial** or **Major to Substantial**	**Major**	**Moderate**	Minor	Negligible
Medium	**Major**	**Moderate**	Minor	Negligible	Negligible
Low	**Moderate**	Minor	Minor	Negligible	Negligible

3.11.3 A severe level of significance is assigned where a townscape or visual effect represents a key factor in the decision-making process. These effects are generally, but not exclusively, associated with altering the integrity of sites and features of national or regional importance. A change at a district scale site or feature may also enter this category, though this is subject to professional judgement and will be proportional to the type and extent of development that is being assessed. Where there is a combination of receptor high sensitivity and a major effect, professional judgement may be applied to determine a 'major to substantial level of significance where it is considered that the effect does not represent a key factor in the decision-making process or where the development will have limited effects such that it will not alter the integrity of sites and features of national or regional importance.

3.11.4 The above table has regard to guidance in the Guidelines for Landscape and Visual Impact Assessment, (3rd Edition, 2013), at paragraphs 3.32-3.33, pages 40-41; paragraph 5.56, page 92 (significance of landscape effects) and paragraph 6.44, page 116 (significance of visual effects).