

View 34: Copeland Road/ Brayards Road

View 34 Existing: Copeland Road/ Brayards Road

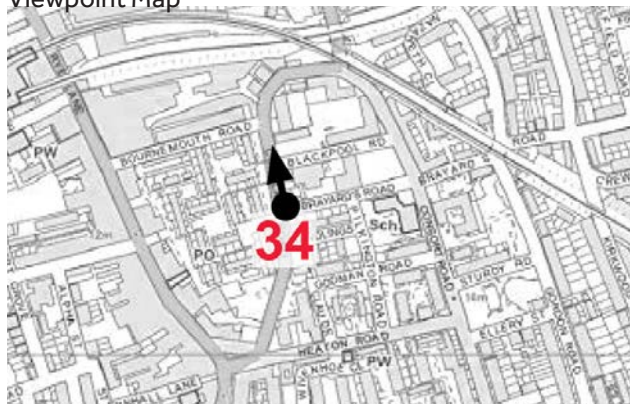
9.289 This viewpoint is located at the junction of Copeland Road and Brayards Road. The view is looking north in the direction of the Site. It is likely that most people in his location would be local residents.

9.290 Both sides of the road are lined largely by two storey housing. The relatively straight alignment of the road provides it with a directional quality. Large trees obscure views into the distance to a considerable extent.

Sensitivity to change

9.291 This view presents a **low** sensitivity to change.

Viewpoint Map



View 34 - Proposed: Copeland Road/ Brayards Road

View 34 Proposed:

9.292 The Proposed Development is seen as a blue dashed wireline in this view, due to it being occluded by surrounding townscape and large, dense trees – even in their winter condition. Glimpses of the Proposed Development will be available through the branches during the months when there are no leaves, though it will likely be difficult to fully perceive the architectural quality of the buildings. During the summer months, foliage will likely mean full occlusion and no visual effects.

Magnitude of change

9.293 The change perceived through the trees would be **small** at most.

Significance of effect

9.294 As it would be difficult to discern the architecture through the trees the visual effect would be **minor, neutral and not significant**.



View 34 - Cumulative: Copeland Road/ Brayards Road

View 34 Cumulative:

9.295 Some of the consented tall buildings to the north coming forward close to Old Kent Road would be visible from this viewpoint, representing a future baseline scenario (denoted by the orange 'wirelines' visible in the view, including on the skyline). In relation to this future baseline element the cumulative effect of the Proposed Development would remain **minor, neutral and not significant**.



View 35: Peckham Hill Street, outside M.Manze

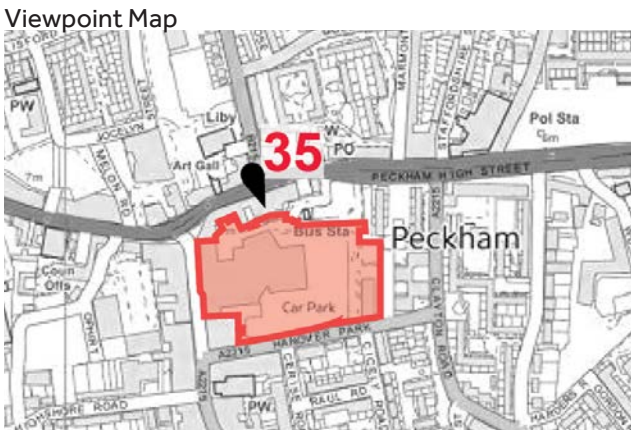
View 35 Existing: Peckham High Street, outside M. Manze

9.296 This viewpoint is located on the northern side of Peckham High Street, north of the Site, at the junction with Peckham Hill Street, and the view is looking south-east. It is likely that most people in this location would be residents, typically on the move along this main road, and other users of local shops and businesses. The viewpoint and the buildings on the southern side of the street lie within the Rye Lane Conservation Area, some of them repaired under the Peckham Townscape Heritage Initiative (THI).

9.297 The buildings on the southern side of the street appear as a varied collection of mostly historic properties, of different ages, styles and height. Several have been extended in the later 20th century.

Sensitivity to change

9.298 On balance, this view presents a **medium** sensitivity to change, although some elements of it are less sensitive.



View 35 - Proposed: Peckham Hill Street, outside M.Manze

View 35 Proposed:

9.299 The Proposed Development is seen as a detailed blue wireline, partially sitting behind the high street buildings on the south of Peckham High Street. The stepping of the tallest buildings on the Site, down to an intermediate lower height, and then down to the existing high street buildings, would be understood from this viewpoint, and the layering achieved would be appreciated. This is supported by the proportions of the new buildings, which would reflect some of the proportions of the existing buildings seen in the foreground. There would be clear sky maintained behind the historic buildings further east, allowing for a clear reading of the new elements within the backdrop.

Magnitude of change

9.300 There would be a **medium** magnitude of change.

Significance of effect

9.301 The effect would be **moderate, beneficial** and **significant**.



View 35 - Cumulative: Peckham Hill Street, outside M.Manze

View 35 Cumulative:

9.302 There would be no cumulative change in this view. **No effect.**



View 36: Cerise Road

View 36 Existing: Cerise Road

9.303 This viewpoint is located on the eastern side of Cerise Road, south of the Site, at the junction with Raul Road, and the view is looking north. It is likely that most people in this location would be local residents.

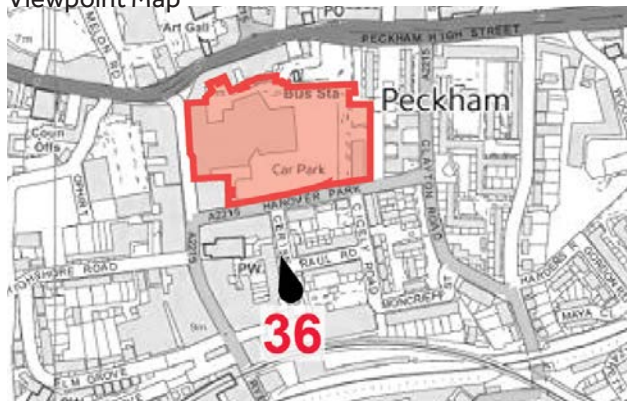
9.304 The buildings visible along Cerise Road comprise two storey semi-detached and terraced houses, dating from the mid to late 19th Century. Those on the immediate east side of Cerise Road were lost to WWII bombing leaving unresolved flank elevations on the right of the view and an unusual openness on one side of the street. Hanover Park House, a four storey block of mediocre quality is visible to the end of the street.

9.305 The existing buildings on the Site, associated with the Aylesham Centre, are visible to the background, though somewhat concealed by trees even in this winter view. The rooflines of taller buildings are just visible beyond.

Sensitivity to change

9.306 This view presents a **low** sensitivity to change.

Viewpoint Map



View 36 - Proposed: Cerise Road

View 36 Proposed:

9.307 The Proposed Development is seen as a photorealistic render in this view, terminating the view of Cerise Road to the north. Some of the Proposed Development would be occluded by the small-scale residential buildings in the foreground, and the centre of the view by the street trees, even in this winter view. Above the existing foreground heights, however, the Proposed Development would be visible, replacing low quality townscape to the north with a much more prominent development creating a new skyline.

9.308 The southern edge of the Proposed Development is designed to respond to the lower context, with lower edge building and clear routes into the development to connect into the wider Peckham context. The tonality of the brickwork proposed and the variation in the design of the buildings, alongside the sky spaces between the taller elements, contributes to the group contributing positively to the view as a distinct composition.

Magnitude of change

9.309 There would be a **large** magnitude of change.

Significance of effect

9.310 The effect would be **minor to moderate, beneficial** and **significant**.



View 36 - Cumulative: Cerise Road

View 36 Cumulative:

9.311 There would be no cumulative effect as other consented schemes falling in the view frame would not be visible owing to occlusion by intervening townscape, including the Proposed Development itself. **No effect.**



View 37: Peckham High Street (north side, opposite bus station)

View 37 Existing: Peckham High Street (north side, north of 135)

9.312 This viewpoint is located on the northern side of Peckham High Street, north-east of the Site. The viewpoint, being located at 137 Peckham High Street, looks south towards the bus station entrance. It is likely that most people in this location would be local residents on the move along this main road, users of local businesses and predominantly pedestrians and cyclists crossing the road.

9.313 The bus station appears at the centre of the view, with post-war apartment block of Purdon House sitting perpendicular to Peckham High Street seen obliquely on the left side of the view. 118-120 Peckham High Street fronting the street, and smaller scale historic buildings further to the west in the town centre, appear on the right side of the image. Purdon House and the visible Peckham High Street buildings give no meaningful definition or sense of entrance to the bus station.

9.314 The bus station view is often affected by the high volume of vehicles on Peckham High Street, and the bus driveway running parallel to Purdon House at the centre of the view with buses parked along the bays to its west. The Site lies between these lower scale buildings and Purdon House. As the existing supermarket is not visible within the view (although its car park is in the middle-ground), the Site in its current state has no real visual presence in this view.

Sensitivity to change

9.315 This view presents a **very low** sensitivity to change.



View 37 - Proposed: Peckham High Street (north side, opposite bus station)

View 37 Proposed:

9.316 The Proposed Development is seen as a photorealistic render in this view, filling the view much more substantially than the small-scale buildings to the south currently do. Building L fronts onto the bus station parking area, with Building P to its left and Buildings K and D to the right towards Rye Lane. Building M is seen rising above them all behind, as the tallest building on Site. All have a distinctive character in terms of their proportions, vertical or horizontal emphasis, colouration through brick type, use of balconies, or roofline. They read, however, in this view, as a family of new buildings with routes between them into the heart of the Site behind.

9.317 The large arched motifs running along the pavement of the bus station at ground floor link the northern frontages to the language that would also be experienced along Rye Lane, tying the designs together. The materiality and tonality of the buildings are varied, but share a common thread, creating a shared character across the Site. Magnitude of change

9.318 There would be a **large** magnitude of change.

Significance of effect

9.319 The effect would be **negligible to minor, beneficial** and **not significant** in EIA terms.



View 37 - Cumulative: Peckham High Street (north side, opposite bus station)

View 37 Cumulative:

9.320 There would be no cumulative effect as other consented schemes falling in the view frame would not be visible owing to occlusion by intervening townscape, including the Proposed Development itself. **No effect.**

9.321 The full narrative assessment is summarised below in these ES tables, which shows the significance of the environmental impact.





10. Demolition & Construction

10.1 This chapter assesses the potential effects of the Proposed Development during the demolition and construction stages of the scheme.

10.2 The Site for redevelopment covers an area of 2.7 ha. As existing, it accommodates the Aylesham Centre alongside an associated surface car park which has 353 parking spaces, with a service yard, and petrol filling station to the east. The Aylesham Centre comprises retail units fronting on to Rye Lane with additional retail units within a covered mall set back within the body of the Site, including a Morrisons supermarket. There are some scattered trees on the Site, principally within the car parking areas and on the southern boundary of the Site to Hanover Park.

10.3 The Site's built structures would be removed to allow for the redevelopment. The works will also include ground preparation and excavation for the Proposed Development as required. It is envisaged that works will take place across two broad phases over a 9-year period, from commencement of enabling and demolition works in Q2 2026 with completion in Q4 2034. Phase 1 (to the east of the Site) would comprise development of the replacement supermarket and of Buildings L, M, N, Q and P; Phase 2 (to the west of the Site) would comprise development of Buildings A, B, C, D, E, F, G, H and J.

10.4 For the purposes of assessing demolition and construction works effects, it is anticipated that Phase 1 would commence in Q2 2026 with completion in Q2 2030; and Phase 2 would commence in Q2 2030 with completion in Q4 2034.

10.5 The assessment below considers the peak time of construction of both when assessing the potential heritage, townscape and visual demolition and construction effects of the Proposed Development.

Potential demolition and construction effects

10.6 Works involved during the demolition and construction phases can have visual effects that can affect the setting of heritage assets and appreciation of their significance, as well as the quality of the townscape and the visual amenity of people. These works usually involve the use of heavy machinery and tall cranes and the erection of other infrastructure needed for construction, such as scaffolding, hoarding, mobile cranes, site lighting, temporary site offices and facilities, etc., as well as ground excavation and building of foundations, before the construction of the buildings themselves.

10.7 The assessment of the effects of demolition and construction considers the duration of works and the scale of the development being built. The assessments are carried out by utilising the AVRs presented in Chapter 9, which help visualise the likely effects of the demolition and construction process in terms of their visibility. According to the programme schedule, the construction across two phases will last until Q4 2034 and thus the effects will be short-term. It should be noted that first occupation of a residential building

within Phase 1 of the Proposed Development is anticipated to be Building N in 2029. Residents (visual receptors) in this and other buildings within Phase 1 will experience visual demolition and construction effects for up to 5 years while they are in residence, as Phase 2 is built.

10.8 The demolition and construction activities are seen together with the existing Site and emerging building, and other townscape features, therefore they are most likely to represent an additional element of change in townscape views. During the peak of the construction phase the magnitude of change owing to the Proposed Development may therefore be at its largest owing to the presence of construction machinery, such as cranes, hoarding and temporary lighting rigs. For the purpose of the assessment, their effects are likely to be of an adverse nature and can vary from negligible or no change, to minor, moderate, and in some cases, major significance.

10.9 The effects are varied depending on the distance between the Site. The closer the receptor, the higher the possibility that the Site is more exposed and therefore the visibility of demolition and construction works is likely to increase. The following assessments are based on the distance between the receptors and the Site and have been categorised into close, medium and long distances from the Site. The effects are applicable to heritage receptors (i.e. the character and appearance of conservation areas and the setting and significance of

listed buildings, locally listed buildings and THI buildings (as identified in Chapter 7), townscape receptors (i.e. special characteristics of townscape character areas as identified in Chapter 8) and visual receptors (i.e. people experiencing townscape views as described in Chapter 9).

10.10 Generally, effects are adverse during the demolition and construction phase but temporary, with effects in the long-term becoming more positive towards completion. A completed scheme becomes appreciable, as assessed within Chapters 6, 7 and 8 of this HTVIA, without the temporary measures such as hoarding being present.

Heritage effects	Townscape effects		
10.11 For close distance receptors (statutory listed: 58 Peckham High Street and Baptist Chapel Rye Lane Locally listed: The Former Jones & Higgins Building, 86-88 Peckham High Street, The Bun House, 98-104 Peckham High Street, Central Building Rye Lane, 12-16 Rye Lane, 22A-24 Rye Lane, 47, 49 Rye Lane, 28 Rye Lane, 51-57 Rye Lane (odd), Shard's Terrace, Peckham Arch, 71-77 Peckham High Street, 65, 67 Peckham High Street, 119 Peckham High Street, 109 Peckham High Street and Orchard Place Mission Hall) change to the heritage significance of the assets would be limited, but the ability to appreciate them within their context would tend to be adversely affected during the demolition and construction phases. One significant adverse but temporary effect was identified during demolition and construction, to the Rye Lane Peckham Conservation Area (Moderate; Adverse).	10.15 For one close distance townscape receptor (TCA A: Central Peckham, retail, civic and leisure) the magnitude of change during demolition and construction would be relatively large and the nature adverse. Temporary demolition and construction effects would therefore be significant for this receptor (Moderate to major; Adverse).	during peak construction: View 1, One Tree Hill (Moderate to major, adverse); View 4, Peckham Hill Street (Moderate to major, adverse); View 5, Peckham Hill Street opposite Mountview Academy (Moderate, adverse); View 6 Peckham High Street, opposite Rye Lane junction (Moderate, adverse); View 8 Rye Lane/ Hanover Park (Moderate, adverse); View 9 Rye Lane / Highshore Road (Moderate, adverse); View 10 Peckham High Street, north side, at Melon Road (Moderate to major, adverse); View 11 Peckham High Street, south side, close to Bellenden Road (Moderate, adverse); View 12a Peckham High Street, south side, west of Summer Road (Moderate, adverse); View 12b Peckham High Street, south side, at Collyer Place/Persepolis Café (Moderate, adverse); View 16 Surrey Canal Walk, near Lisford Street (Moderate, adverse); View 17 Peckham Square (Moderate to major, adverse); View 19 Highshore Road (Moderate, adverse); View 29 Clayton Road, looking along Hanover Park (Minor to moderate, adverse); View 30 Peckham Levels - viewing platform (Moderate to major, adverse); View 31 Peckham Levels - centre (Moderate to major, adverse); View 32 - Bussey Building - west (Moderate to major, adverse); View 33 Bussey Building - east (Moderate to major, adverse); and View 35 Peckham High Street, outside M. Manze (Moderate, adverse).	is completed, leading to a temporary significant and adverse effect. For other long distance receptors (e.g. views 2, 3, 14 and 21) the magnitude of change would tend to be smaller. Assessment did not identify any significant effects in these views.
10.12 For medium and longer distance heritage receptors (conservation areas: Peckham Hill Street Conservation Area, Holly Grove Conservation Area, Caroline Gardens Conservation Area, Nunhead Green Conservation Area, Kentish Drovers and Bird in Bush Conservation Area, Camberwell Grove Conservation Area, Sceaux Gardens Conservation Area; statutory listed: Post Office Depot, 8-14 Highsore Road, 16 & 18 Highshore Road, 21 & 23 Highshore Road and 25 Highshore Road; locally listed or THI buildings: 110-114 Peckham Hill Street, Peckham Library, 41-43 Peckham High Street, 32 Peckham High Street, 64 Rye Lane, 66 Rye Lane, public House 1 Claydon Road and Wakefield House) the magnitude of change would range from no change to very small or small, but where perceptible would be adverse in nature but not significant.	10.16 For medium and long distance receptors (TCA B - historic residential Peckham; TCA C: Central Peckham housing, east of Site; TCA D: Central Peckham housing, north of Site and TCA E: Terraced streets, north of Queen Anne's Road) the magnitude of change would be smaller, ranging from very small to medium and the nature adverse. None of these receptors would be significantly affected.	10.20 Residents (visual receptors) in Building N and thereafter other buildings completed and occupied in Phase 1, will experience visual effects for up to 5 years while they are in residence, as Phase 2 is built. These visual effects would occur in westward views looking across the Phase 2 part of the Site, often from raised levels, including balconies. These effects would tend to be significant and adverse, but would be temporary.	10.22 All visual effects owing to demolition or construction activities would be temporary and would cease once construction is over and the Proposed Development is completed and in operation.
10.13 All heritage effects owing to demolition or construction activities would be temporary and would cease once construction is over and the Proposed Development is completed and in operation.	10.17 All townscape effects owing to demolition or construction activities would be temporary and would cease once construction is over and the Proposed Development is completed and in operation.	10.21 For other receptors at greater distance the magnitude of change would tend to be smaller, but the nature still adverse. For views of greater sensitivity, there remains the potential for significant visual effects during the demolition and construction phases. Assessment identified a significant effect in View 1 One Tree Hill, Honour Oak Park (Moderate to major, adverse) for example. In this case the magnitude of change in the view at peak construction is likely to be larger than the magnitude of change when the Proposed Development	10.23 A summary of visual effects as a result of demolition and construction works is found in Table 11.3.
10.14 A summary of heritage effects as a result of demolition and construction works is found in Table 11.1 in Chapter 11 of this HTVIA.	10.18 A summary of townscape effects as a result of demolition and construction works is found in Table 11.2 in Chapter 11 of this HTVIA.		
	Visual effects		Potential cumulative effects
	10.19 For close and some medium distance receptors (e.g. views 4, 5, 6, 8, 9, 10, 11, 12a, 12b, 16, 17, 19, 29, 30, 31, 32, 33, and 35) the magnitude of change would be medium or large, in some cases larger than the visual effect during operation, and the nature would tend to be adverse during the peak construction phase. Amongst the close and mid range views, there are some exceptions, such as view 7, where the magnitude of change would be smaller. Depending on the sensitivity of these views, there is therefore the potential for significant temporary visual effects during the demolition and construction phases. Assessment identified significant effects in the following views		10.24 The effects as described above have the potential to change as a result of the additional effect of the Proposed Development over other schemes coming forward in the area. The cumulative effects will change over time, as the time of demolition and construction of the Proposed Development and cumulative schemes may overlap at different stages. Hence, it is difficult to predict with accuracy what the temporal nature of these effects may be, though all are considered to be short-term and reversible, as the evolution of the area becomes complete over time.
			10.25 Of the cumulative schemes considered, the most likely to interact with the Proposed Development is the development on the Open Land Rear of 1-51 Peckham High Street (also referred to as Summerhouse and Flaxyard site) owing to its scale and relative proximity to the Site. However, this cumulative scheme is already under construction and is likely to be completed and operation by the time that the Proposed Development is at peak construction. It is not considered that any additional demolition and construction effects, will arise in relation to this future baseline scheme.



Mitigation

- 10.26 According to industry best practice, the Applicant would develop and implement a project specific Demolition and Construction Environmental Management Plan (DCEMP), setting out the standards and procedures to be adhered to during demolition and construction, to manage the associated short term environmental effects. It is expected that this may be secured by condition.
- 10.27 The mitigation of potential construction effects would follow industry best practice construction standards, such as the use of appropriate hoarding. Site lighting would be designed to minimise light pollution on the surroundings of the Site, using light sources of the minimum intensity required and ensuring that light is only used where needed.
- 10.28 The mitigation measures set out here are likely to have the greatest effect in the areas closer to the Site, as outlined above, as well as for Phase 1 internal receptors, where hoarding would screen views of the construction activities related to the lower elements of the buildings. Hence, for the close distance effects, the potential effects of demolition and construction could be slightly reduced in significance. However, in all cases the significance is likely to remain within the same overall band and therefore unchanged.

11. Conclusion

Overview

- 11.1 The assessments presented in this document have taken into account the effects on heritage receptors through an assessment of their heritage significance and the contribution that their setting makes to this significance, as well as the change to the character and appearance and the setting and the ability to appreciate significance that would arise as a result of the Proposed Development. Assessments have been made both in terms of the requirements of the EIA Regulations, and in terms of Chapter 16 of the NPPF and impacts on heritage significance.
- 11.2 In terms of townscape effects, the assessments considered the baseline conditions of five townscape character areas and how the Proposed Development would change their character, either directly or indirectly, depending on their interrelationships and inter-visibility.
- 11.3 In terms of the effect on visual amenity, the effects on visual receptors arising from changes to 37 townscape views were assessed. All assessments were carried out for the Proposed Development in isolation and cumulatively, with other emerging schemes, consented or under construction, in the townscape surrounding the site.
- 11.4 The effects arising from the Proposed Development have also been assessed in light of the architects' detailed designs. The Townscape Consultancy has advised the architects on the development of the design throughout the pre-application process, in

order to ensure that any necessary mitigation is embedded in the final designs assessed. The Proposed Development was described and independently assessed for its effects on the immediate and wider townscape within Chapter 6 of this HTVIA. It was found that it has been sensitively designed, taking into consideration the effects on the setting of the Rye Lane Peckham Conservation Area, and the neighbouring designated heritage receptors, such as the Grade II listed Baptist Chapel, Rye Lane alongside the locally listed Former Jones & Higgins Building and 47, 49 Rye Lane.

- 11.5 Overall, the Proposed Development is considered to be of high-quality architecture, designed by a pre-eminent and award-winning architectural practice, and would become a positive and distinctive addition to Rye Lane town centre and the existing setting of the Rye Lane Peckham Conservation Area. In particular, the Proposed Development responds to its heritage-sensitive context to the west and meets the policy objectives for this part of Peckham within the London Borough of Southwark, as set out in the Planning Statement prepared by Avison Young.
- 11.6 Further, it achieves what the Peckham and Nunhead Character Study outlines in the site allocation, by creating a more urban form and scale of development to street frontages and building heights that create an appropriate sense of enclosure for the public realm. It includes massing and articulation that breaks down

any large scale elements of built form so that their scale is not intrusive, at roof level in particular, and employs a design approach that relates well to the characteristic vertical rhythms of the town centre's street frontages.

- 11.7 The Proposed Development will also introduce a range of public benefits, detailed within the DAS by architects dRMM, and the Planning Statement by Avison Young.

Effects during demolition and construction

- 11.8 The effects of the demolition and construction works of the Proposed Development on the surrounding heritage, townscape, and visual receptors were assessed in Chapter 10. Tables 11.1, 11.2 and 11.3 in this concluding chapter also summarise these effects. It was found that there would be significant and adverse heritage, townscape and visual demolition and construction effects, but that these would be short-term and temporary in nature.

Effects on heritage receptors (EIA Regs Assessment)

- 11.9 The potentially affected designated heritage receptors surrounding the site were identified by following the methodology as set out in Chapter 2 of this HTVIA. This included conservation areas, listed buildings and structures, locally listed buildings, and 'Townscape Heritage Initiative' buildings identified

by London Borough of Southwark. The heritage significance of these receptors, including any contribution made by their setting, was also assessed.

- 11.10 It was found that the heritage significance of heritage receptors and their immediate settings would be adversely affected by the Proposed Development in isolation in three instances, relating to: 58 Peckham High Street (listed at Grade II); the group of Grade II listed houses at the east end of Highshore Road; and the locally listed former Jones & Higgins Department Store building; and cumulatively in two (the listed 58 Peckham High Street and the locally listed former Jones & Higgins Building). However, none of these heritage effects are considered to be significant in EIA terms, since they range from negligible to minor effects.
- 11.11 In most instances there would be no effect on the heritage significance of receptors in the surrounds of the Proposed Development. In these cases, 'no effect' in EIA terms was recorded. In other instances, the heritage effects were not significant.
- 11.12 Table 11.1 summarises the effects of the Proposed Development on the heritage receptors identified in Chapter 7 of this HTVIA in EIA terms.



Effects on heritage receptors (NPPF Impact Assessment)

- 11.13 In NPPF (Chapter 16) heritage impact assessment terms, a small number of instances of 'less than substantial harm', were recorded, at the low end of the scale, in respect of the designated heritage assets at 58 Peckham High Street (listed at Grade II) and the Highshore Road houses (Grade II). In both of these cases there would be a small diminution of the prominence of these buildings on the skyline in a small number of views. In cases where 'less than substantial harm' is identified in respect of designated heritage assets, para. 208 of the NPPF applies. This paragraph states that *'where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use'*.
- 11.14 The former Jones & Higgins Department Store is not a designated heritage asset, being a locally listed building (it is therefore a non-designated heritage asset). In NPPF terms, the Proposed Development would cause some low level harm to the heritage significance of the locally listed building and the ability to appreciate it. In cases where any harm is identified in respect of a non-designated heritage asset, para. 209 of the NPPF applies. This paragraph states that *'in weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset'*.
- 11.15 There would be effects on the Rye Lane Peckham Conservation Area arising from the Proposed Development. These include the slight diminution of the clock tower of the former Jones & Higgins Department Store, as described above, in some views. The Jones & Higgins building is an important local landmark within the conservation area, particularly in eastward views from Peckham High Street. It is considered, however, that harm in these views is minimised, particularly in the view identified as most important by officers during the pre-application

process (View 12b at Collyer Place), as well as in views closer to the Site on Peckham High Street than viewpoint 12b. In addition, the development of Buildings A, B and C, replacing the existing poor frontage of the Aylesbury Centre, within the boundary of the conservation area on Rye Lane, leads to heritage benefits, which balance the slight diminution of the appreciation of the Jones & Higgins clocktower in a small number of views. On balance, there is considered to be no harm to the significance of the designated heritage asset.

Effects on townscape receptors

- 11.16 The potential effects of the Proposed Development on the immediate and wider townscape character areas were assessed in Chapter 8 of this HTVIA, in accordance with the methodology presented in Chapter 2. It was found that, in isolation, the Proposed Development would result in some 'beneficial' effects on townscape receptors in the surrounding context of the Site. The effect on most TCA's would be negligible, minor, or moderate and therefore not significant.

- 11.17 Cumulative effects ranged from 'no effect' to 'moderate to major', with one being deemed as 'beneficial' in nature.

- 11.18 A summary of these effects is presented in Table 11.2.

Effects on visual receptors

- 11.19 The effects of the Proposed Development on visual receptors were assessed in Chapter 9 of this HTVIA. These effects are summarised in Table 11.3.
- 11.20 It was found that, in isolation, the Proposed Development would result in effects ranging from 'no effect' to 'moderate to major'. Two receptors would experience 'no change' as the result of the Proposed Development. These were Views 2: Nunhead Cemetery and 3: Peckham Rye Park.

- 11.21 Most effects were found to be either of a 'beneficial' or 'neutral' nature, with three views experiencing 'adverse' effects as a result of the Proposed Development: views 12a, 16 and 26. Only one of these was recorded as a significant adverse effect in EIA terms (View 12a: Peckham Road (south side west of 11)).

- 11.22 In terms of cumulative effects, those views that did experience an effect on the Proposed Development through cumulative development were classed as having a 'minor', 'moderate' or 'moderate to major' and 'neutral' or 'beneficial' effect. Most had 'no effect', with only view 12a experiencing an 'adverse' cumulative effect owing to the additional presence of the consented scheme on the Open Land Rear of 1-51 Peckham High Street (also referred to as Summerhouse and Flaxyard site) in the view.

- 11.23 Raised views from the south, from the Peckham Levels building and the Bussey Building, though not strictly 'public' in nature, offer open views towards central London and its skyline. Because these buildings are wide and orientated east-west, to some extent the views they offer are kinetic in nature. From some of the viewpoints the visibility of distant landmarks would be more limited, or lost, although some key landmarks, including St Paul's Cathedral, would be revealed through gaps in the Proposed Development from other positions. Owing to the compositional qualities of the Proposed Development in the foreground of these views, the effect is considered 'neutral' overall, while new residents in the Proposed Development itself would experience new and high quality views towards the City and immediately into the Rye Lane Peckham Conservation Area close to the Jones and Higgins building.

Summary of effects

- 11.24 Except for the effects during demolition and construction, which are temporary, the effects found in the assessment as a result of the Proposed Development were in the majority found to be either 'neutral' or 'beneficial' in respect to the surrounding heritage, townscape, and visual receptors. In EIA terms and in respect of the proposed Development, 18 views, 1 TCA and 1 HA were found to be significant – or have a moderate or major effect. Cumulatively, only 8 views and 1 TCA were found to have significant effects.

Group	Name	Sensitivity	Magnitude of change	Significance of effect and nature of effect (residual)	Significant/not significant (residual)	Significance of effect and nature of effect (cumulative)	Significant/not significant (cumulative)	Significance of effect and nature of effect (demolition and construction)	Significant/not significant (demolition and construction)
	Conservation Areas:								
	Rye Lane Peckham Conservation Area	Medium	Small	Minor, neutral	Not Significant	Minor, neutral	Not Significant	Moderate, adverse	Significant
	Peckham Hill Street Conservation Area	Medium	Small	Minor, neutral	Not Significant	No effect	No effect	Minor, adverse	Not significant
	Holly Grove Conservation Area	Medium	Very small	Negligible to Minor, neutral	Not Significant	No effect	No effect	Negligible to Minor, adverse	Not Significant
	Caroline Gardens Conservation Area	Medium	No change	No effect	No effect	No effect	No effect	No effect	No effect
	Nunhead Green Conservation Area	Medium	No change	No effect	No effect	No effect	No effect	No effect	No effect
	Kentish Drovers and Bird in Bush Conservation Area	Medium	No change	No effect	No effect	No effect	No effect	No effect	No effect
	Camberwell Grove Conservation Area	Medium	No change	No effect	No effect	No effect	No effect	No effect	No effect
	Sceaux Gardens Conservation Area	Medium	No change	No effect	No effect	No effect	No effect	No effect	No effect
	Listed Buildings:								
	58 Peckham High Street	Low	Very small	Negligible, adverse	Not significant	Negligible, adverse	Not significant	Negligible, adverse	Not significant
	Baptist Chapel, Rye Lane	Medium	No change	No effect	No effect	No effect	No effect	No effect	No effect
	Post Office Depot	Medium	No change	No effect	No effect	No effect	No effect	No effect	No effect
Group 1	8-14 Highshore Road	Medium	Small	Minor, adverse	Not significant	No effect	No effect	Minor, adverse	Not significant
	16 and 18 Highshore Road								
	7, 9 and 11 Highshore Road								
	17 and 19 Highshore Road								
	21 and 23 Highshore Road								
	25 Highshore Road								
	Locally Listed Buildings (& Townscape Heritage Initiative Buildings):								
	110-114 Peckham Hill Street	Low	No change	No effect	No effect	No effect	No effect	No effect	No effect
Group 2	Peckham Library	Low	Very small	Negligible, neutral	Not significant	No effect	No effect	Negligible, adverse	Not significant
	Peckham Arch								
Group 3	Shard's Terrace	Low	Very small	Minor, neutral	Not significant	No effect	No effect	Minor, adverse	Not significant
	119 Peckham High Street								
	109 Peckham High Street								
	Orchard Place Mission Hall								
	128 Peckham Hill Street (THI)								
	111 Peckham High Street (THI)								
Group 4	71-77 Peckham Hill Street	Low	Very small	Negligible, neutral	Not significant	Negligible, neutral	Not significant	Negligible, adverse	Not significant
	65, 67 Peckham High Street								
	Central Buildings, Rye Lane								
	59 Peckham High Street (THI)								
	61 Peckham High Street (THI)								
	62 Peckham High Street (THI)								
	63 Peckham High Street (THI)								
	Central Buildings Rye Lane (THI)								
Group 5	32 Peckham High Street	Low	Small	Minor, neutral	Not significant	Minor, neutral	Not significant	Minor, adverse	Not significant
	41-43 Peckham High Street								
	The former Jones & Higgins Department Store	Medium	Small	Minor, adverse	Not significant	Minor, adverse	Not significant	Minor, adverse	Not significant
Group 6	86-88 Peckham High Street	Low	Very small	Negligible, neutral	Not significant	No effect	No effect	Negligible, adverse	Not significant
	The Bun House, 96 Peckham High Street								
	98-104 Peckham High Street								
	47, 49 Rye Lane	Medium	No change	No effect	No effect	No effect	No effect	No effect	No effect
	51-57 Rye Lane (odd)	Very low	No change	No effect	No effect	No effect	No effect	No effect	No effect
	61-63 Rye Lane	Low	No change	No effect	No effect	No effect	No effect	No effect	No effect

Table 11.1: Heritage effects table



Group 7	12-16 Rye Lane	Low	Small	Minor, beneficial	Not significant	No effect	No effect	Minor, adverse	Not significant
	22A-24 Rye Lane								
	28 Rye Lane								
	64 Rye Lane								
	66 Rye Lane								
	86 Peckham High Street (THI)								
	88 Peckham High Street (THI)								
	90 Peckham High Street (THI)								
	92 Peckham High Street (THI)								
	94 Peckham High Street (THI)								
	98 Peckham High Street (THI)								
	100 Peckham High Street (THI)								
	102 Peckham High Street (THI)								
	104 Peckham High Street (THI)								
	106 Peckham High Street (THI)								
	116 Peckham High Street (THI)								
	118-120 Peckham High Street (THI)								
	122 Peckham High Street (THI)								
	18, 18a and 18b Rye Lane (THI)								
	26 Rye Lane (THI)								
Table 11.1: Heritage effects table									

Name	Sensitivity	Magnitude of change	Significance of effect and nature of effect (residual)	Significant/not significant (residual)	Significance of effect and nature of effect (cumulative)	Significant/not significant (cumulative)	Significance of effect and nature of effect (demolition and construction)	Significant/not significant (demolition and construction)
TCA A - central Peckham, retail, civic and leisure	Medium	Large	Moderate to major, beneficial	Significant	Moderate to major, beneficial	Significant	Moderate to major, adverse	Significant
TCA B - historic residential Peckham	High	Small	Minor to moderate, neutral	Not significant	No effect	No effect	Minor to moderate, adverse	Not significant
TCA C - central Peckham housing, east of Site	Low	Medium	Minor, beneficial	Not significant	No effect	No effect	Minor, adverse	Not significant
TCA D - central Peckham housing, north of Site	Medium	Small	Minor, neutral	Not significant	Minor, neutral	Not significant	Minor, adverse	Not significant
TCA E - terraced streets, north of Queen's Road	Medium	Very small	Negligible to minor, neutral	Not significant	No effect	No effect	Negligible to minor, adverse	Not significant

Table 11.2: Townscape effects table



Name	Sensitivity	Magnitude of change	Significance of effect and nature of effect (residual)	Significant/not significant (residual)	Significance of effect and nature of effect (cumulative)	Significant/not significant (cumulative)	Significance of effect and nature of effect (demolition and construction)	Significant/not significant (demolition and construction)
View 1 - One Tree Hill, Honour Oak Park	High	Small	Minor to moderate, neutral	Not significant	Minor to moderate, neutral	Not significant	Moderate to major, adverse	Significant
View 2 - Nunhead Cemetery	High	No change	No effect	No effect	No effect	No effect	No effect	No effect
View 3 - Peckham Rye Park	Medium	No change	No effect	No effect	No effect	No effect	No effect	No effect
View 4 - Peckham Hill Street	Medium	Large	Moderate to major, beneficial	Significant	No effect	No effect	Moderate to major, adverse	Significant
View 5 - Peckham Hill Street opposite Mountview Academy	Medium	Large	Moderate to major, beneficial	Significant	No effect	No effect	Moderate to major, adverse	Significant
View 6 - Peckham High Street, opposite Rye Lane junction	Medium	Medium	Moderate, beneficial	Significant	No effect	No effect	Moderate, adverse	Significant
View 7 - Peckham High Street, west of junction with Peckham Hill Street	Medium	Very small	Negligible, neutral	Not significant	No effect	No effect	Minor, adverse	Not significant
View 8 - Rye Lane / Hanover Park	Medium	Medium	Moderate, beneficial	Significant	No effect	No effect	Moderate, adverse	Significant
View 9 - Rye Lane / Highshore Road	Medium	Medium	Moderate, neutral	Significant	No effect	No effect	Moderate, adverse	Significant
View 10 - Peckham High Street (north side, at Melon Road)	Medium	Large	Moderate to major, beneficial	Significant	Moderate to major, beneficial	Significant	Moderate to major, adverse	Significant
View 11 - Peckham High Street (south side, close to Bellenden Road)	Medium	Medium	Moderate, beneficial	Significant	Moderate, beneficial	Significant	Moderate, adverse	Significant
View 12a - Peckham High Street (south side, west of Summer Road)	Medium	Medium	Moderate, adverse	Significant	Moderate, adverse	Significant	Moderate, adverse	Significant
View 12b - Peckham High Street (south side, at Collyer Place/Persepolis Cafe)	Medium	Medium	Moderate, neutral	Significant	Moderate, neutral	Significant	Moderate, adverse	Significant
View 13 - Peckham Road (north side, opposite Walmer Castle Court)	Low	Small	Minor, beneficial	Not Significant	Minor, beneficial	Not Significant	Minor, adverse	Not Significant
View 14 - Surrey Canal Walk, from Hill Street bridge	Low	Very small	Negligible, neutral	Not Significant	No effect	No effect	Negligible, adverse	Not Significant
View 15 - Surrey Canal Walk, from Commercial Way bridge	Low	Very small	Negligible, neutral	Not Significant	No effect	No effect	Negligible, adverse	Not Significant
View 16 - Surrey Canal Walk, near Lisford Street	Medium	Small	Minor, adverse	Not Significant	No effect	No effect	Moderate, adverse	Significant
View 17 - Peckham Square	Medium	Large	Moderate to major, beneficial	Significant	No effect	No effect	Moderate to major, adverse	Significant
View 18 - Lyndhurst Square	Low	Small	Minor, beneficial	Not significant	No effect	No effect	Minor, adverse	Not significant
View 19 - Highshore Road	Medium	Medium	Moderate, neutral	Significant	No effect	No effect	Moderate, adverse	Significant
View 20 - Holly Grove	Low	Very small	Negligible, neutral	Not Significant	No effect	No effect	Negligible, adverse	Not Significant
View 21 - Grove Park	Medium	Very small	Negligible to minor, beneficial	Not significant	No effect	No effect	Negligible to minor, adverse	Not significant
View 22 - Consort Road	Low	Medium	Minor, beneficial	Not significant	No effect	No effect	Minor, adverse	Not significant
View 23 - Cossall Park	Low	Medium	Minor, beneficial	Not significant	No effect	No effect	Minor, adverse	Not significant
View 24 - Queen's Road, opposite Wood's Road	Low	Very small	Negligible, neutral	Not significant	No effect	No effect	Negligible, adverse	Not significant
View 25 - Meeting House Lane, Kincaid Road	Low	Small	Minor, beneficial	Not significant	No effect	No effect	Minor, adverse	Not significant
View 26 - Friary Road / Fenham Road	Medium	Very small	Negligible to minor, adverse	Not significant	No effect	No effect	Negligible to minor, adverse	Not significant
View 27 - Peckham High Street, outside Police Station	Low	Medium	Minor, beneficial	Not significant	Minor, beneficial	Not significant	Minor to Moderate, adverse	Not significant
View 28 - Peckham High Street, junction with Marmot Street	Low	Large	Minor to moderate, beneficial	Not significant	Minor to moderate, beneficial	Not significant	Minor to moderate, adverse	Not significant
View 29 - Clayton Road, looking along Hanover Park	Low	Large	Minor to moderate, beneficial	Significant	No effect	No effect	Minor to moderate, adverse	Significant
View 30 - Peckham Levels - viewing platform	Medium	Large	Moderate to major, neutral	Significant	Moderate to major, neutral	Significant	Moderate to major, adverse	Significant
View 31 - Peckham Levels - centre	Medium	Large	Moderate to major, neutral	Significant	Moderate to major, neutral	Significant	Moderate to major, adverse	Significant
View 32 - Bussey Building - west	Medium	Large	Moderate to major, neutral	Significant	Moderate to major, neutral	Significant	Moderate to major, adverse	Significant
View 33 - Bussey Building - east	Medium	Large	Moderate to major, neutral	Significant	Moderate to major, neutral	Significant	Moderate to major, adverse	Significant
View 34 - Copeland Road / Brayards Road	Low	Small	Minor, neutral	Not significant	Minor, neutral	Not significant	Minor, adverse	Not significant
View 35 - Peckham High Street, outside M. Manze	Medium	Medium	Moderate, beneficial	Significant	No effect	No effect	Moderate, adverse	Significant
View 36 - Cerise Road	Low	Large	Minor to moderate, beneficial	Not significant	No effect	No effect	Minor to moderate, adverse	Not significant
View 37 - Peckham High Street (north side, opposite bus station)	Very low	Large	Negligible to minor, beneficial	Not significant	No effect	No effect	Negligible to minor, adverse	Not significant

Table 11.3: Visual effects table

Appendix 1: Millerhare's Methodology

Appendices (continued)

A6 Methodology for the production of Accurate Visual Representations

Overview of Methodology

A6.1 The study was carried out by Millerhare (the Visualiser) by combining computer generated images of the Proposed Development with large format photographs at key strategic locations around the site as agreed with the project team. Surveying was executed by Absolute Survey (the Surveyor).

A6.2 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.

A6.3 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.

A6.4 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

A6.5 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.

A6.6 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.

A6.7 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.

A6.8 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

A6.9 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.

A6.10 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.

A6.11 The Visualiser assigned a unique reference to each Assessment Point and Photograph.

Final Photography

A6.12 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.

A6.13 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.

A6.14 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

A6.15 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.

A6.16 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.

A6.17 From these the local survey stations, the requested alignment points were surveyed using conventional observation.

A6.18 The resulting survey points were amalgamated into a single data set by the Surveyor. This data set was supplied as a spreadsheet 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.

A6.19 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

A6.20 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.

A6.21 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.

A6.22 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

A6.23 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.

A6.24 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.

A6.25 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.

A6.26 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

A6.27 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.

A6.28 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

A6.29 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.

A6.30 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.

A6.31 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.



Appendices (continued)

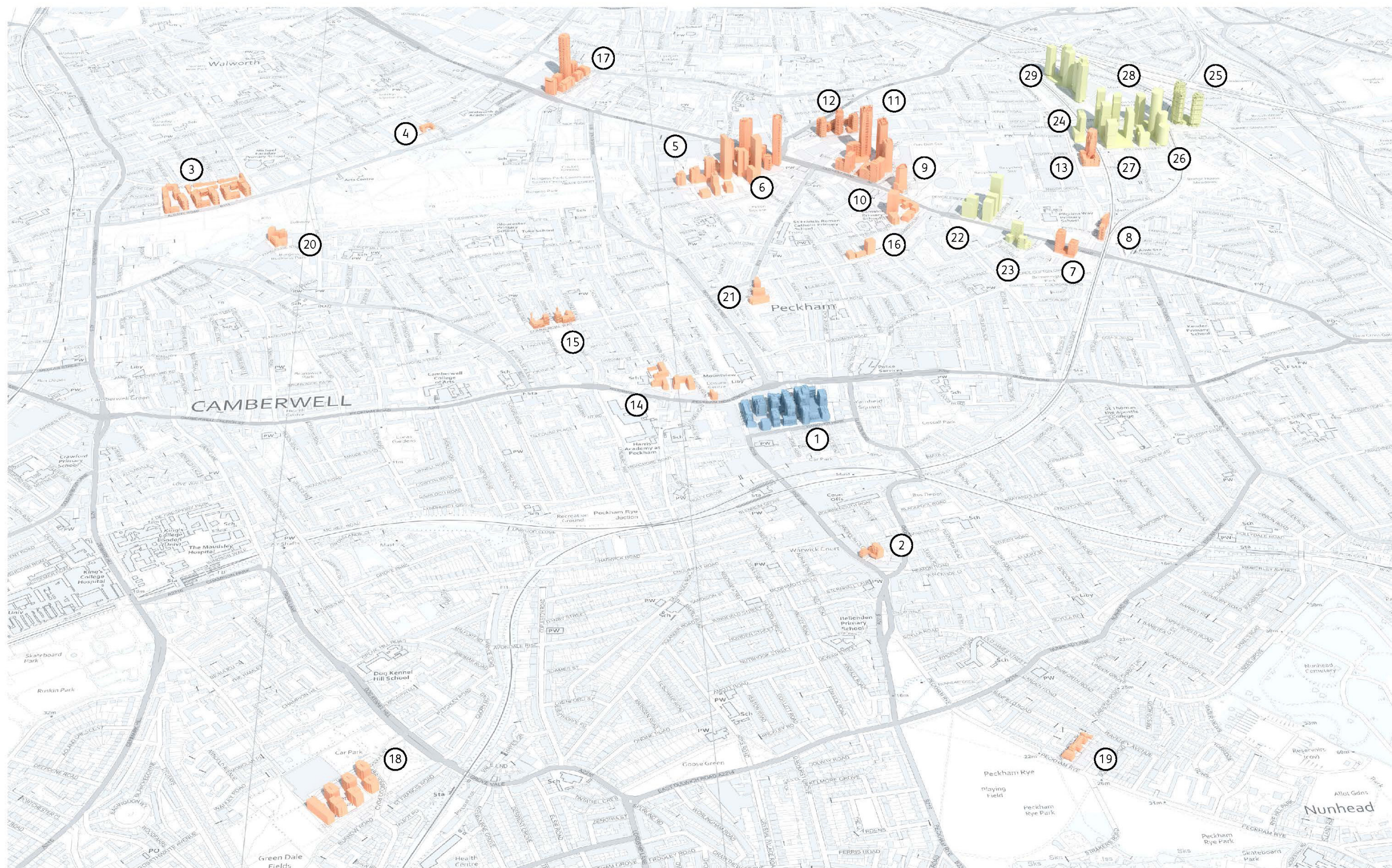
- Creating more sophisticated renderings
- A6.32 Where more sophisticated representations of the Proposed Developments were required (AVR3) the initial model is developed to show the building envelope in greater detail. In addition, definitions were applied to the model to illustrate transparency, indicative material properties and inter-reflection with the surrounding buildings.
- A6.33 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.
- A6.34 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.
- A6.35 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.
- A6.36 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.
- A6.37 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.
- A6.38 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
- A6.39 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.
- A6.40 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.
- A6.41 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.
- A6.42 Any exceptions to the applied policies or deviations from the methodology were clearly described.
- A6.43 Where appropriate, additional images were included in the study report, showing the Proposed Development in the context of other consented schemes.

Appendix 2: Millerhare's cumulative schemes

Appendices (continued)

A3 Details of schemes

index	scheme name	address	reference	PA	status	source of model data	positioning method	MH reference	MH id	colour
1	Aylesham Centre	n/a	n/a	SBC	Proposed	Paper planning application drawings from local authority	Best fit to Ordnance Survey	swrk9003.detail240417-drm-m-proposed	#3038	Blue
2	213 Rye Lane London	213 Rye Lane London SE15 4TP	16/AP/0131	SBC	Legal Consent granted	Paper planning application drawings from local authority	Best fit to Ordnance Survey	swrk9003.mass240508-jt-proposed	#3025	Orange
3	Aylesbury Estate Phase 1	Aylesbury Estate, Land bounded by Albany Road, Portland Street, Westmoreland Road and Bradenham Close, London SE17	17/AP/3885	SBC	Legal Consent granted	Paper planning application drawings from local authority	Best fit to Ordnance Survey	ayles-1.surface181110-dp-consented	#1929	Orange
4	Aylesbury Estate Site Phase 2B	Land Bounded By Thurlow Street And Albany Road And Kinglake Street And Bagshot Street London Southwark SE1 7 And SE5	22/AP/2226	SBC	Legal Consent granted	Paper planning application drawings from local authority	Best fit to Ordnance Survey	ayles-4.mass240505-kd-consented	#3026	Orange
5	Malt Street Regeneration	Malt Street Regeneration Site Land Bounded By Bianca Road Latona Road Haymerle Road Frensham Street And Malt Street London SE1	20/AP/3242	SBC	Legal Consent granted	Paper planning application drawings from local authority	Best fit to Ordnance Survey	okr10-e.mass240502-kd-consented	#3027	Orange
6	Cantium Retail Park	Land at Cantium Retail Park, 520 Old Kent Road, London, SE1 5BA	18/AP/3246	SBC	Legal Consent granted	Paper planning application drawings from local authority	Best fit to Ordnance Survey	okr10-g.profile181112-dp-proposed	#1921	Orange
7	840 Old Kent Road	840 Old Kent Road	19/AP/1322	SBC	Legal Consent granted	Paper planning application drawings from local authority	Best fit to Ordnance Survey	okr17.mass190522-dp-consented	#2077	Orange
8	313-349 Ilderton Road	313-349 Ilderton Road London Southwark	20/AP/1329	SBC	Legal Consent granted	Paper planning application drawings from local authority	Best fit to Ordnance Survey	swrk0344.mass181206-dp-consented	#2457	Orange
9	Old Kent Road Ruby Street	Land bounded by Ruby street, Murdock Street and 685-695 Old Kent Road, London, SE15 1JS	18/AP/0196	SBC	Legal Consent granted	Paper planning application drawings from local authority	Best fit to Ordnance Survey	okr13-c.profile190328-rb-consented	#2039	Orange
10	651-657 Old Kent Road	651-657 Old Kent Road, London, SE15 1JU	19/AP/1710	SBC	Legal Consent granted	Paper planning application drawings from local authority	Best fit to Ordnance Survey	okr13-e.surface191128-kn-proposed	#2110	Orange
11	Ruby Triangle	Ruby Triangle Site, land bounded by Old Kent Road, Ruby Street and Sandgate Street, London, SE15 1LG	18/AP/0897	SBC	Legal Consent granted	Paper planning application drawings from local authority	Best fit to Ordnance Survey	okr13.profile181112-dp-proposed	#1796	Orange
12	6-12 Verney Road	6-12 Verney Road, London, SE16 3DH	17/AP/4508	SBC	Legal Consent granted	Paper planning application drawings from local authority	Best fit to Ordnance Survey	okr13-b.profile190328-dp-proposed	#2036	Orange
13	227-255 Ilderton Road	227-255 Ilderton Road London SE15 1NS	19/AP/1773	SBC	Legal Consent granted	Paper planning application drawings from local authority	Best fit to Ordnance Survey	okr16-b.mass191023-kn-consented	#2163	Orange
14	Summer House and Flaxyard Site	Open Land Rear Of 1-51 Peckham High Street Bounded By Sumner Avenue And Melon Road Open Land Adjacent To 59 Peckham High Street And Sumner House Located On Sumner Road London	16/AP/4018	SBC	Legal Consent granted	Paper planning application drawings from local authority	Best fit to Ordnance Survey	swrk0409.mass240415-cw-consented	#3030	Orange
15	25 Commercial Way	Vacant Site Opposite Central Venture Park Commercial Way SE15 (On The Site Of Former 25 Commercial Way),	16/AP/4702	SBC	Legal Consent granted	Paper planning application drawings from local authority	Best fit to Ordnance Survey	swrk9005-a.mass240508-rb-consented	#3031	Orange
16	Ledbury Estate	Ledbury Estate Commercial Way London Southwark	22/AP/0554	SBC	Legal Consent granted	Paper planning application drawings from local authority	Best fit to Ordnance Survey	swrk0377.mass240415-cw-consented	#2075	Orange
17	Southernwood Old Kent Road	Southernwood Retail Park, 2 Humphrey Street, London, SE1 5JJ	18/AP/3551	SBC	Legal Consent granted	Paper planning application drawings from local authority	Best fit to Ordnance Survey	okr4.mass190520-rb-consented	#3032	Orange
18	Dulwich Hamlet Football Ground	Dulwich Hamlet Football Ground	19/AP/1867	SBC	Legal Consent granted	Paper planning application drawings from local authority	Best fit to Ordnance Survey	swrk9002.mass240505-kd-consented	#3033	Orange
19	40-46 Solomons Passage	40-46 Solomons Passage, Peckham, London	20/AP/3285	SBC	Legal Consent granted	Paper planning application drawings from local authority	Best fit to Ordnance Survey	swrk9001.mass240430-kd-consented	#3034	Orange
20	25-33 Parkhouse Street	25-33 Parkhouse Street	20/AP/0858	SBC	Legal Consent granted	Paper planning application drawings from local authority	Best fit to Ordnance Survey	swrk0368.mass240505-kd-consented	#3035	Orange
21	Bells Gardens Community Centre	Bells Gardens Community Centre	21/AP/1077	SBC	Legal Consent granted	Paper planning application drawings from local authority	Best fit to Ordnance Survey	swrk9005-b.mass240505-kd-consented	#3028	Orange
22	747-759 & 765-775 Old Kent Road and Land At Devonshire Grove	747-759 & 765-775 Old Kent Road And Land At Devonshire Grove London SE15 1NZ	23/AP/1862	SBC	Legal Consent granted	Paper planning application drawings from local authority	Best fit to Ordnance Survey	okr18.mass240415-cw-consented	#3029	Orange
23	812 Old Kent Road	812 Old Kent Road London SE15 1NH	19/AP/0994	SBC	Submitted for planning	Paper planning application drawings from local authority	Best fit to Ordnance Survey	okr17-c.mass191023-kn-proposed	#2160	Yellow
24	Ilderton Wharf 1-7 Rollins Street	Ilderton Wharf 1-7 Rollins Street London Southwark SE15 1EP	21/AP/4757	SBC	Submitted for planning	Paper planning application drawings from local authority	Best fit to Ordnance Survey	okr16-c.mass240418-cw-consented	#3036	Yellow
25	New Bermondsey - Phase 1 Orion	Surrey Canal Road, Stockholm Road, Bolina Road And, Rollins Street, London, SE16	DC/20/119706	Lewisham	Submitted for planning	Paper planning application drawings from local authority	Best fit to Ordnance Survey	lews0041.detail201030-sew-proposed	#2198	Yellow
26	New Bermondsey - Phase 2 Excelsior Works	Surrey Canal Road, Stockholm Road, Bolina Road And, Rollins Street, London, SE16	DC/20/119706	Lewisham	Submitted for planning	Paper planning application drawings from local authority	Best fit to Ordnance Survey	lews0039a.mass200814-sew-proposed	#2192	Yellow
27	New Bermondsey - Phase 3 Timber Wharf	Surrey Canal Road, Stockholm Road, Bolina Road And, Rollins Street, London, SE16	DC/20/119706	Lewisham	Submitted for planning	Paper planning application drawings from local authority	Best fit to Ordnance Survey	lews0039.mass200814-sew-proposed	#2193	Yellow
28	New Bermondsey - Phase 4 Stockholm	Surrey Canal Road, Stockholm Road, Bolina Road And, Rollins Street, London, SE16	DC/20/119706	Lewisham	Submitted for planning	Paper planning application drawings from local authority	Best fit to Ordnance Survey	lews0038.mass200814-sew-proposed	#2194	Yellow
29	New Bermondsey - Phase 5 Bolina Gardens	Surrey Canal Road, Stockholm Road, Bolina Road And, Rollins Street, London, SE16	DC/20/119706	Lewisham	Submitted for planning	Paper planning application drawings from local authority	Best fit to Ordnance Survey	lews0037.mass200814-sew-proposed	#2195	Yellow



Aerial diagram showing location of schemes

Appendix 3: Zone of Theoretical Visibility

Introduction		
A3.1	This Appendix includes a Zone of Theoretical Visibility (ZTV) analysis of the Proposed Development, as illustrated in figures A3.1. The ZTV was conducted using the Vu.City software in-house, with a 3D model provided by the architects. The extent of the ZTV analysis was selected to cover the maximum range allowed in Vu.City, namely 2 Km	
Background		
A3.2	Vu.City is a digital 3D visualisation software released in December 2016. The Townscape Consultancy is aware that an increasing number of local authorities are subscribing its use. Vu.City renderings, models, or full project files are often used to assist Local Authorities in their assessment of a proposed development.	
Assumptions and limitations		
A3.3	Despite common usage of Vu.City, it is important to note that this software does not necessarily produce an accurate representation of reality and should not be considered as a replacement for Verified Views. Verified Views are photomontages produced using specialised cinematic software: a rendered image is superimposed on a photograph using site-specific survey data for verification. The lower tolerance of error in Verified Views can be assessed and corrected more precisely than model images produced in Vu.City. Verified Views are more accurate and more representative of what will actually be built than Vu.City model images.	
ZTV		
A3.4	According to Vu.City documentation, the Vu.City City Model is created from LIDAR data and building volumes are considered accurate to a tolerance of +/- 15cm. Trees are placed using this LIDAR data which is also a basis for defining the trunk location and canopy volume. This City Model has been modified using publicly available planning data to include and remove buildings completed and demolished since the original LIDAR scan. The City Model relies on the accuracy of the initial scan, the processing of scanned data, the accuracy of publicly available planning data, as well as the accuracy of the timeline for project completion or demolition. As a crude and generalised representation of built form, Vu.City is a useful tool, however this generalisation has sometimes resulted in errors and deficiencies in the City Model. As such, model images produced using Vu.City should be used as a tool to inform professional judgment rather than conclusive evidence or substitute for Verified Views.	
A3.5	Zone of Theoretical Visibility (ZTV), also known as a Zone of Visual Influence (ZVI) or Viewshed Analysis, is an advanced scoping tool. Using a digital model provided by the architects, the Vu.City ZTV illustrates locations from which a proposed development could be visible. Areas of the City Model are marked in colours corresponding to the parts of the proposed development can be seen – from areas marked in red, the whole height of the target building can potentially be seen, including the base of the 3D model and higher; for the areas marked in blue, only the part of the building marked in blue (usually its top) can potentially be visible.	
A3.6	The accuracy of the Vu.City ZTV is dependent on the accuracy of the City Model. It further depends on the accuracy of the digital model provided by the architects, which is then contingent on polygon topology, resolution, and normal direction. The analysis does not take into account trees and other vegetation, small-scale street furniture, nor the transparency of buildings. As such, it is possible that areas marked in the Vu.City ZTV as offering visibility of the proposed development may in reality not offer it, and similarly, areas marked in the Vu.City ZTV as offering no visibility of the proposed development may in reality offer it. Like considerations of model images, ZTV analysis should be considered a scoping tool to inform professional judgement.	
Liability		
A3.7	The Townscape Consultancy has no liability for the use of model images derived from Vu.City, nor the use of Vu.City models by a Local Authority, any other consultees, or interested parties. Where a digital model has been shared as a file for import into Vu.City, or where a project file has been shared through the Vu.City platform, The Townscape Consultancy takes no responsibility for the accuracy of the 3D model itself, nor its placement into the Vu.City environment. Local Authorities are encouraged to verify the model as imported, using information provided by the architects.	



Figure A3.1: VuCity ZTV

Appendix 4: Additional Views suggested by Historic England



Figure A4.1: Views from Lewisham Council's draft Local Plan (proposed submission document, Regulation 19 stage, January 2023, Schedule 1: strategic and local views, vistas and landmarks, p802), suggested by Historic England during consultation. Horniman Gardens.



Zoomed in

Camera Location [535767, 43, 176076] Bearing 292° Pitch 0° Focal Length 24mm 21/06/2023 16:00

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Figure A4.2: Views from Lewisham Council's draft Local Plan (proposed submission document, Regulation 19 stage, January 2023, Schedule 1: strategic and local views, vistas and landmarks, p802), suggested by Historic England during consultation. Telegraph Hill Upper Park.

Appendix 5: Addressing Scoping Response

Topic	Para in Scoping Response	Content	Consultant Notes
Townscape Visual Impact Assessment			
	91	The Scoping Report states that the Heritage, Townscape and Visual Assessment will be presented as one volume but assessed using different methodologies. This is a concern as heritage would need to be considered separately. It should have its own stand-alone chapter. For instance, this would clearly assess and differentiate between the Proposed Development's heritage effects and townscape and visual effects. There are also different considerations and legislative and policy tests which would apply to each discipline, particularly in the identification of value and significance.	This is understood. Heritage is dealt with in its own chapter within the HTVIA (chapter 7 Heritage Heritage Assessment). Chapters 8 and 9 deal with townscape and visual assessments. Distinct methodologies are used, as set out in Chapter 2 Methodology, in reflection of different legislative and policy tests.
	92	The TVIA should address the effects of the Proposed Development on: - the physical characteristics of the site and its surroundings (including landscape elements such as vegetation/ trees if present); - landscape/ townscape character; - protected views (e.g. those defined within The London View Management Framework and within The Southwark Plan 2019-2036); and - people (visual receptors) in the surrounding areas.	The assessment proportionately considers these effects.
	93	It is stated that the methodology for the TVIA will be in accordance with IEMA and the Landscape Institute's 'Guidelines for Landscape and Visual Impact Assessment' 2013 ('GLVIA3') which is acceptable. The Scoping Report sets out a brief overview of the methodology with more detailed explanation to be provided within the TVIA.	Further detail and full methodology provided within the HTVIA (Chapter 2).
	94	The study area for the TVIA should include all areas with potential to be significantly affected (either directly or indirectly) by the development. For the townscape assessment this should be based on the extent of townscape character areas likely to be significantly affected either directly or indirectly. A digitally produced Zone of Theoretical Visibility is commonly used to identify the extent of possible significant visual effects.	Noted and agreed. A ZTV was utilised in determining, initially, the level of visual conjunction between the Proposed Development and receptors; it is provided at Appendix 3.
	95	The townscape and visual study areas are not clearly defined or described within the Scoping Report. There is no study area boundary/ radius shown on the Townscape Character Areas Map (Figure 4) or Map of Viewpoint Locations (Figure 3). The study areas for the townscape and visual assessment should be clearly mapped, described and justified. The study areas should be reviewed as part of the assessment process to ensure all significant effects can be reported.	The study area for the HTVIA was established on the basis of consideration of a ZTV showing potential intervisibility between the Proposed Development and receptors. This is considered a proportionate and reasonable approach given the townscape and visual topic. A prescriptive circular radius was avoided for the assessment of TCAs, because areas of defined character do not normally fit within geometric shapes.
	96	Baseline: The TVIA baseline should include a description of the site and its surroundings in terms of physical landscape/ townscape features, landscape/ townscape character, and designated sites and areas (setting out clearly the reasons for their designation).	Agreed. This baseline is included in Chapters 5-9 of the HTVIA.
	97	The scattered trees within the site and on the site boundary should be located and described in the baseline as landscape/ townscape elements and their loss/ retention considered in the assessment of effects.	Trees and their role are considered proportionately Chapters 5, 6 and 9 of the HTVIA.
	98	The scale of townscape character areas shown in Figure 4 appears appropriate but, as mentioned above, the extent of townscape character areas to be included in the assessment needs to be defined (the study area). The division of the study area into character areas should draw on and include reference to published character assessments for the Borough e.g. Peckham and Nunhead Characterisation Study by Southwark Council March 2012.	Noted and included as above. Relevant published documents were considered.
	99	In terms of designated sites and areas there may be some overlap with the Built Heritage section, for example the mapping and recording of Conservation Areas, Listed Building and Peckham Townscape Heritage Initiative buildings.	Noted. Clear mapping included in Chapter 7: Heritage Assessment. See Figures 7.1, 7.2 & 7.3 in particular.
	100	37 representative viewpoints have been identified for the assessment and are located on Figure 3 within the Scoping Report. It is stated that these are based on a previously unsubmitted application (of similar height and scale). Without a ZTV/ defined visual study area, it is assumed this is based on information provided as part of the previously unsubmitted application.	ZTV of the Proposed Development included at Appendix 3.
	101	The baseline should include production of a ZTV of the Proposed Development and identify potential visual receptors within the ZTV. This ZTV should make sure viewpoints cover well visited areas, local communities, users of important open spaces and footpaths, and designated areas that fall within the ZTV. The viewpoints should be mapped onto the ZTV with designated areas so that the relationship between the areas of visibility and representative viewpoints can be seen.	Included proportionately at Figure 9.1 within Chapter 9: Visual Assessment.
	102	Base mapping should be of high quality to ensure geographical locations of viewpoints can be clearly understood by the reader.	Agreed and included.
	103	The relationship between visual receptor groups (e.g. local communities, users of open spaces) and viewpoints should be made clear in the TVIA, noting that the receptors of visual effects are people not viewpoints, except in the case of protected views which can also be receptors in their own right. The existing visual amenity of receptors should be described.	Agreed and included within the Visual Assessments in Chapter 9.
	104	Scope assessment: It is recognised here that demolition and construction have the potential to result in significant effects and so the TVIA should assess the significance of effects resulting from the demolition and construction. It should also include the reporting on the significance of effects with reference to sensitivity and magnitude criteria. The assessment should report on the 'maximum' potential effect on any receptor.	Demolition and construction effects included in Chapter 10, and summarised in tables in Chapter 11.
	105	The methodology and assessment criteria should be in accordance with IEMA and the Landscape Institute's 'Guidelines for Landscape and Visual Impact Assessment' 2013 ('GLVIA3'). The overview of the methodology in the Scoping report is very brief but appears in accordance with the principles set out in GLVIA3. The methodology and assessment criteria used will be provided in detail within the TVIA. Detailed criteria for assessing susceptibility, value, sensitivity and magnitude should be provided in the TVIA. Separate criteria should be provided for townscape character and visual amenity.	Information on approach taken provided within Chapter 2: Methodology (including from 2.50 onwards).

Table A5.1: TVIA ES Scoping Opinon Table



	106	Significance of effects will be determined by considering the sensitivity of the affected townscape/landscape resource or visual receptor, and the magnitude of change acting on that resource/receptor. Clear justification for how sensitivity and magnitude are combined to determine overall effects should be included in the TVIA - to show transparency in the assessment process.	Information provided within Chapter 2: Methodology, at 2.66 and 2.77.
	107	How the direction of effects (beneficial, adverse or neutral) will be judged should be clearly set out within the TVIA relating to criteria/ definitions for both townscape and visual receptors (as judging beneficial or adverse directions of effect will be different for townscape and visual receptors). For example, for townscape receptors changes should be judged in terms of how they contribute to, or detract from character (with justification) and for visual amenity how the changes contribute to, or detract from visual amenity experienced by visual receptor groups (with justification).	Information provided within Chapter 2: Methodology, at 2.83.
	108	Visual material: The TVIA will be accompanied by Accurate Visual Representations (AVRs) produced by Miller Hare which would be of benefit. These will be provided either as rendered (photorealistic) images ('AVR3') or as 'wirelines' (diagrammatic representations showing the outline of the Proposed Development, 'AVR1').	Agreed and included at Chapter 9: Visual Assessment.
	109	Cumulative Assessment: There are no specific rules about cumulative assessment. The 2017 EIA Regulations have restricted the requirement to consideration of "cumulation with other existing and/or approved development projects" (Schedule 4, Paragraph 5 (e)) while GLVIA3 (paragraphs 7.13 and 7.14) suggests that schemes that are the subject of a valid planning application that has not yet been determined should also be included.	Noted. Cumulative methodology included in Chapter 2: Methodology at 2.86.
	110	The cumulative assessment should distinguish between the more certain cumulative scenario (which would include all consented but unbuilt schemes), and the less certain scenario (which would include all consented but unbuilt schemes as well as undetermined planning applications). It is suggested that the focus should be on the former.	Agreed and Included. Appendix 2: Millerhare's cumulative schemes detail further.
	111	It is stated in the Scoping Report that the approach to, and the type of visual and townscape cumulative assessment will be 'additional' focussing on the additional effects of the Proposed Development on top of the cumulative baseline. This is acceptable.	Noted.
	112	The Scoping Report indicates that cumulative schemes will be shown on the visualisations together with the Proposed Development. Schemes that have been consented should be distinguished from those which have not, such as use of distinct colours for different planning status.	Noted and included.
	113	Mitigation: The TVIA should describe the measures proposed to avoid, reduce, and remedy significant adverse effects. This should include an indication of the effectiveness of the stated measures and demonstrate a clear commitment to implementing the mitigation measures. Where mitigation for the operational stage will be embedded within the scheme proposals this should be specified.	Included within Chapter 2: Methodology at 2.4., and referenced where appropriate in the assessment chapters of the HTVIA.
	114	Non-Technical Summary: The TVIA section of the NTS should provide sufficient information for the non-specialist reader to understand the main environmental impacts of the proposal without reference to the main ES..	Noted and provided by Trium.

Table A5.1: TVIA ES Scoping Opinion Table

Topic	Para in Scoping Response	Content	Consultant notes
Built Heritage			
	115	Effects on built heritage assets are scoped into the ES as the site lies partially within the Rye Lane Peckham Conservation Area. This is acceptable; both the setting and direct impact on designated and non-designated heritage assets should be referenced in this section.	Noted and carried out in Chapter 7 of HTVIA.
	116	There is some variation in terminology in the Scoping Report text for the subject of this assessment, with “(built) heritage”, “built heritage” and “HA”, all used in reference to heritage assets. This is noted but should be amended. For instance, reference should be made to built heritage as this would indicate it is a clear counterpart to the Archaeology (buried heritage assets) chapter. At present the report does not clarify whether the chapter’s remit includes above-ground heritage assets of an archaeological or designed landscape nature (e.g. scheduled monuments and registered parks and gardens) which may not be understood as ‘built heritage assets’ by some readers. Further discussion and clarity would be required.	This has been clarified in the HTVIA as appropriate.
	117	Receptors: Paragraph 16 of the Scoping Report presents limited information drawn from radii of 1km, 500m and 250m from the site. It is not clear how these study areas have been established, or why they are acceptable for gauging potential effects. There is no detailed discussion of the heritage assets within these areas, nor data sources used to obtain this information; reference is made to a desktop survey (of which the result are not reproduced) as being sufficient to contextualise the scheme’s potential to give rise to effects on above-ground heritage assets. The desktop survey should be provided with the ES.	Establishment of the Study Area described within Chapter 2: Methodology, and shown in more detail in Chapter 7: Heritage Assessment. 21. The study area was defined based on consideration of a Zone of Theoretical Visibility (ZTV) as the design of the Proposed Development emerged, as well as professional judgement, to identify heritage receptors potentially affected, whether directly or indirectly, by the Proposed Development.
	118	The baseline information in the SR includes a map (Figure 1) which shows a 500m radius and shows limited range of designated above-ground heritage assets lying within the area, showing only Conservation Areas or Grade II* Listed Buildings (Grade II Listed Buildings and locally listed buildings are not included). Any maps within the ES will need to show the full range of assets under consideration and it is not clear from this plan, or from Figure 2, whether consideration to other grades of listed buildings will be assessed. All listed buildings and their setting, including Grade II listed buildings are afforded the same legal protection. Similarly, you should conduct a review of non-designated heritage assets that could experience effects – as a minimum, the authority’s local list and the Greater London Historic Environment Record (GLHER) should be consulted, and appropriate fieldwork conducted to undertake an inspection of known assets and identify any additional assets that should be considered in the assessment.	See Figures 7.1, 7.2 & 7.3 in Chapter 7: Heritage Assessment. Clear differentiation between Conservation Areas, listed and locally listed buildings as well as Peckham Townscape Heritage Initiative Buildings are mapped and the GLHER consulted, as stated within Chapter 2: Methodology at 2.10.
	119	Further information as to this process is required to determine suitability of this approach and it is recommended that the Applicant consult with LBS and Historic England to establish an appropriate study area, or series of study areas, and a process by which the scoping in or out of particular assets to the assessment can be demonstrated within the ES in a proportionate fashion.	LBS and HE were both consulted to achieve this.
	120	Heritage approach: The Scoping Report has listed guidance within the Policy and legislation section, and has not offered a comprehensive guidance list for the assessment of the historic environment.	See Chapter 3: Policy and Guidance alongside References at the back of the document.
	121	The NPPF has undergone recent updates, and that the most recent version should be referenced - paragraph 24 references paragraph 189 of the NPPF, which is no longer applicable to the historic environment.	Noted. References updated in accordance with the current version of the NPPF.
	122	Paragraphs 25 – 28 reviews the methodology for assessment, and primarily focuses on changes to heritage significance through changes in setting. Whilst it is acceptable to include such effects within the scope of the assessment, the potential effects of the development are not confined to those related to a change in the setting of heritage assets. This is because the proposed development includes land within a conservation area, so has the potential to directly affect this designated this heritage asset. No consideration to these direct effects has been given within the Scoping Report, nor how these will be addressed or scoped out, as they are not referenced within the Buried Archaeology chapter. Please however note that built heritage and archaeology should be separate sections.	Direct’ and ‘Indirect’ heritage effects, taking into account the location of part of the Site within the Rye Lane Peckham Conservation Area, are considered in Chapter 7 of the HTVIA. See also Chapter 2 Methodology, paras 2.20 to 2.49.
	123	Visualisations, including AVR, to explain effects to above-ground heritage assets are to be used but this would need to clearly reference which above-ground heritage asset(s) it relates. Where visualisations are proposed to illustrate the change in setting of a particular asset, the developer should agree the location from which this is to be prepared and the degree of rendering with officers and, if necessary, Historic England.	Covered withn Chapter 2: Methodology as well as within the Chapter 7: Heriatage Assessment. References to heritage assets are also included in Chapter 9: Visual Assessment, to help explain overlapping effects where relevant.

Table A5.2: Heritage ES Scoping Opinon Table



References

Planning policy and supplementary planning documents

- National Planning Policy Framework - Publications - GOV.UK, July 2023
- Planning Practice Guidance- Publications – GOV.UK, last updated June 2021
- London Plan 2021, Mayor of London, 2021
- LB Southwark Local Plan 2022, and other guidance (including Conservation Area Appraisals/ Character Statements).

Guidance documents

- The National Design Guide – Publications – GOV.UK, 2021
- Historic England: Historic Environment Good Practice Advice in Planning Note 2: Managing Significance in Decision-Taking in the Historic Environment, March 2015
- Historic England: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition): The Setting of Heritage Assets, December 2017
- Historic England Advice Note 12: Statements of Heritage Significance: Analysing Significance in Heritage assets, October 2019

Books, online resources and databases

- Ackroyd, P. (2001) *London: The Biography* (London: Vintage)
- Bridget Cherry and Nikolaus Pevsner (1983) *The Buildings of England, London 2: South* (Yale University Press, 1983)
- Historic England's National Heritage List for England (online);
- Greater London Historic Environment Record (online);

Cartographical sources and images

- Old Maps Online - <https://www.oldmapsonline.org/>
- Layers of London - <https://www.layersoflondon.org/>
- Britain from Above - <https://www.britainfromabove.org.uk/>

