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Environmental Statement Volume 2:  
Townscape and Visual Impact Assessment and Built Heritage Assessment

**ABERFELDY VILLAGE MASTERPLAN**



# **Part 1: Townscape and Visual Impact Assessment**

# Aberfeldy Village Masterplan, London E14

## Environmental Statement Volume 2 – Part 1: Townscape and Visual Impact Assessment

October 2021

### Contents

<b>1</b>	<b>Introduction</b>	<b>5</b>
<b>2</b>	<b>Legislation, Planning Policy and Guidance</b>	<b>6</b>
<b>3</b>	<b>Assessment Methodology and Significance Criteria</b>	<b>9</b>
<b>4</b>	<b>Baseline Conditions</b>	<b>16</b>
<b>5</b>	<b>Receptors and Receptor Sensitivity</b>	<b>17</b>
<b>6</b>	<b>Potential Effects</b>	<b>23</b>
	<b>The Views</b>	<b>32</b>
	1   South of East India Dock Road	36
	2   Junction of Robin Hood Lane and Poplar High Street	40
	3   Abbott Road / Etrick Street	44
	4   Portree Street, junction with Abbott Road	48
	5   LBTH borough designated view 6: View from East India Dock Road to Balfron Tower & Canary Wharf in the background	52
	6   A12, junction with Zetland Street	56
	7   Riverside footpath north of River Lea / Bow Creek	60
	8   Bow Creek / River Lea Bridge	64
	9   Cody Road	68
	10   Star Lane Park	72
	11   A12, junction with Teviot Street	76
	12   Uamvar Street	80
	13   LBTH borough designated view 5: View from Langdon Park to Balfron Tower & Canary Wharf in the background	84
	14   Jolly's Green	88
	15   St Leonards Road	92
	16   Pedestrian path from A102 / St Leonards Road	96
	17   All Saints Churchyard, inside west entrance gates	100
	18   Poplar High Street, bridge over railway tracks	104
	19   Poplar Recreation Ground	108
	20   Upper North Street	112
	21   Cordelia Street	116
	22   Bartlett Park	120

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**Contents (continued)**

23   Twelvetrees Crescent, bridge over River Lea and Bow Creek	124
24   LVMF 5A.1 — Greenwich park: the General Wolfe statue — at the orientation board	128
25   Nutmeg Lane	132
26   Upper Bank Street	136
27   Trafalgar Way	140
28   South side of Bow Creek	144
29   Chrisp Street, looking along Willis Street	148
30   A12, junction with East India Dock Road, looking north	152
31   Dee Street / Abbott Road	156
32   Dee Street, midway	160
33   Brownfield Street, outside no.30	164
34   Memorial Recreation Ground	168
<b>Townscape assessment</b>	<b>172</b>
<hr/>	
<b>7 Mitigation Measures and Likely Residual Effects</b>	<b>174</b>
<hr/>	
<b>8 Likely Significant Effects and Conclusions</b>	<b>176</b>
<hr/>	
<b>9 Cumulative Effects Assessment</b>	<b>177</b>
References	178
<hr/>	
<b>Appendices</b>	<b>180</b>
A1 View Locations	180
A2 Details of schemes	186
A3 Model Overview	188
A4 Accurate Visual Representations	190
A5 Methodology for the production of Accurate Visual Representations	192
A6 Zone of Theoretical Visibility	194
A7 Views for On-site Assessment	195
1   South of East India Dock Road	196
2   Junction of Robin Hood Lane and Poplar High Street	197
3   Abbott Road / Ettrick Street	198
4   Portree Street, junction with Abbott Road	199
5   LBTH borough designated view 6: View from East India Dock Road to Balfron Tower & Canary Wharf in the background	200
6   A12, junction with Zetland Street	201
7   Riverside footpath north of River Lea / Bow Creek	202
8   Bow Creek / River Lea bridge	203
9   Cody Road	204
10   Star Lane Park	205
11   A12, junction with Teviot Street	206
12   Uamvar Street	207

### Contents (continued)

13   LBTH borough designated view 5: View from Langdon Park to Balfron Tower & Canary Wharf in the background	208
14   Jolly's Green	209
15   St Leonards Road	210
16   Pedestrian path from A102 / St Leonards Road	211
17   All Saints Churchyard, inside west entrance gates	212
18   Poplar High Street, bridge over railway tracks	213
19   Poplar Recreation Ground	214
20   Upper North Street	215
21   Cordelia Street	216
22   Bartlett park	217
23   Twelvetrees Crescent, bridge over River Lea and Bow Creek	218
24   LVMF 5A.1 — Greenwich park: the General Wolfe statue — at the orientation board	219
25   Nutmeg Lane	220
26   Upper Bank Street	221
27   Trafalgar Way	222
28   South side of Bow Creek	223
29   Chrisp Street, looking along Willis Street	224
30   A12, junction with East India Dock Road, looking north	225
31   Dee Street / Abbott Road	226
32   Dee Street, midway	227
33   Brownfield Street, outside no.30	228
34   Memorial Recreation Ground	229



# 1 Introduction

- 1.1 This document (Part 1 of Volume 2 of the Environmental Statement: Townscape and Visual Impact Assessment (TVIA)) has been prepared by Peter Stewart Consultancy and Millerhare. It is submitted in support of a hybrid planning application for the Aberfeldy Village Masterplan. The hybrid planning application is made for the land lying to the north of East India Dock Road (A13), east of the Blackwall Tunnel Northern Approach Road (A12) and to the south west of Abbot Road (the 'Site') on behalf of The Aberfeldy New Village LLP (The 'Applicant'). The Site lies within the London Borough of Tower Hamlets (LBTH).
- 1.2 The Applicant is seeking permission for a hybrid planning application formed of detailed development proposals in respect of Phase A for which no matters are reserved ("Detailed Proposals"), and outline development proposals for the remainder of the Site (i.e. Phases B, C and D) with all matters reserved ("Outline Proposals"). The Detailed Proposals and Outline Proposals together are referred to as the "Proposed Development". The Proposed Development comprises the comprehensive redevelopment of the Site. The Proposed Development will provide new retail and workspace floorspace along with residential dwellings and the pedestrianisation of the A12 Abbott Road vehicular underpass to create a new east to west route. The Proposed Development will also provide significant areas of public realm, including a new town square, a new High Street and a public park.
- 1.3 Part 1 of Volume 2 of the Environmental Statement (ES) reports the findings of an assessment of the likely significant effects on townscape and visual amenity as a result of the Proposed Development. It contains the following:
- A summary of the legislative and planning policy context relevant to the assessment;
  - A description of the method by which the assessment has been carried out, and of how the images (known as Accurate Visual Representations (AVRs)) in this report have been created;
  - A description of the Site as existing and its immediate context;
  - A characterisation of the Site's surroundings as existing, presenting the existing receptors that may be affected by the Proposed Development and their sensitivity;
  - A description and assessment of the architectural, urban design and townscape qualities of the Proposed Development;
  - An assessment of the visual effect of the Proposed Development on the identified views and its effect on the townscape, including the effects of demolition and construction operations;
- Consideration of mitigation and an assessment of the likely residual effects of the Proposed Development upon townscape and visual receptors;
  - An assessment of the likely significant effects of the Proposed Development upon townscape and visual receptors, and conclusions; and
  - An assessment of cumulative effects, taking into account other new proposed developments in the area.
- 1.4 Above-ground built heritage assets are considered in this assessment in so far as they inform the assessment of the sensitivity of townscape receptors and views. An assessment of the effect of the Proposed Development on the heritage significance of above-ground built heritage assets is provided in **ES Volume 2 – Part 2: Built Heritage Assessment**. Below-ground heritage assets are considered in **ES Volume 1, Chapter 13: Archaeology**.
- 1.5 The verified views contained within this assessment have been produced by Miller Hare.
- 1.6 Consideration of Climate Change is not considered applicable to the TVIA as the assessment of effects on townscape and visual amenity would not change under different climatic scenarios. Therefore, it is not considered in this TVIA.

## 2 Legislation, Planning Policy and Guidance

2.1 This chapter contains a brief overview of legislation and aspects of national, regional and local planning policies and guidance that are particularly relevant to the appearance and visual impact of the Proposed Development. For the purposes of this TVIA, it is those policies concerned with design and townscape matters that are of the greatest relevance.

### STATUTORY DUTIES

- 2.2 The legislation set out below is relevant to this assessment:
- The Town and Country Planning Act 1990 (as amended) (Ref. 2-1);
  - The Planning and Compulsory Purchase Act 2004 (Ref. 2-2); and
  - The Town and Country Planning (Environmental Impact Assessment) Regulations 2017, as amended in 2018 and 2020 (Ref. 2-3).

### PLANNING POLICY

#### National Planning Policy and Guidance

##### The National Planning Policy Framework (2021)

- 2.3 The Government issued the latest version of the National Planning Policy Framework (NPPF) (Ref. 2-4) in July 2021. The NPPF sets out planning policies for England and how these should be applied.
- 2.4 The NPPF states that the purpose of the planning system is to contribute to the achievement of sustainable development, which has three overarching objectives; economic, social and environmental. The NPPF states, at paragraph 10, that *'at the heart of the Framework is a presumption in favour of sustainable development.'*
- NPPF Section 12: Achieving well-designed places*
- 2.5 Section 12 of the NPPF deals with design. At paragraph 126, the NPPF states that *'Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.'*
- 2.6 Paragraph 130 notes that *'Planning policies and decisions should ensure that developments:*
- a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;*
  - b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;*

- c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);*
- d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;*
- e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and*
- f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.'*

2.7 Paragraph 134 states that *'Development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes'*. It goes on to say that *'Conversely, significant weight should be given to:*

- a) development which reflects local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes; and/or*
- b) outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.'*

#### Planning Practice Guidance

- 2.8 The national Planning Practice Guidance (PPG) (Ref. 2-5) was launched on the 6 March 2014 and provides a web-based resource in support of the NPPF. It is updated on an ongoing basis, and the parts cited below are current at the time of writing (October 2021).
- 2.9 The PPG includes a section called 'Design: process and tools' which *'provides advice on the key points to take into account on design'*. This was issued on 1 October 2019; it replaces a previous section called 'Design'.
- 2.10 The PPG deals with the processes of the planning system with respect to design, and notes that guidance on good design is set out in the National Design Guide.

#### The National Design Guide (2019)

- 2.11 The National Design Guide ('NDG') (Ref. 2-6) states (paragraph 3) that it *'forms part of the Government's collection of planning practice guidance'*.
- 2.12 At paragraph 21, the NDG states that well-designed places are achieved by making the right choices at all levels, including:
- The layout (or masterplan)*
  - The form and scale of buildings*
  - Their appearance*
  - Landscape*
  - Materials; and*
  - Their detailing'*
- 2.13 At paragraph 35, the NDG sets out ten characteristics which contribute to the character of places; nurture and sustain a sense of community; and address issues affecting climate. These are described as follows:
- 'Context – enhances the surroundings.*
  - Identity – attractive and distinctive.*
  - Built form – a coherent pattern of development.*
  - Movement – accessible and easy to move around.*
  - Nature – enhanced and optimised.*
  - Public spaces – safe, social and inclusive.*
  - Uses – mixed and integrated.*
  - Homes and buildings – functional, healthy and sustainable.*
  - Resources – efficient and resilient.*
  - Lifespan – made to last.'*
- 2.14 This document (Ref. 2-7) sets out guidance on dealing with tall buildings in the planning process. The Introduction notes that *'alternative approaches may be equally acceptable, provided they are demonstrably compliant with legislation and national policy objectives.'* It notes that what might be considered a tall building will vary from area to area and *'A ten storey building in a mainly two-storey neighbourhood will be*

*thought of as a tall building by those affected, whereas in the centre of a large city it may not.'*

- 2.15 Paragraph 1.1 states that, *'in the right place well-designed tall buildings can make a positive contribution to urban life.'* The main focus of the guidance is promoting a plan led approach and setting out the relevant considerations that tall building policies should address, and setting out the approach and assessments that applicants should follow in promoting such development.
- 2.16 At paragraph 4.5, it provides a list of factors that a high quality scheme should have a positive relationship with:
- 'a. Topography*
  - b. Character of place*
  - c. Heritage assets and their settings*
  - d. Height and scale of development (immediate, intermediate and town – or city-wide)*
  - e. Urban grain and streetscape*
  - f. Open spaces*
  - g. Rivers and waterways*
  - h. Important views including prospects and panoramas*
  - i. The impact on the skyline'*
- 2.17 At paragraph 4.8, it sets out a list of design criteria that a successful application will need to fully address:
- 'a. Scale*
  - b. Form and massing*
  - c. Proportion and silhouette*
  - d. Facing materials*
  - e. Detailed surface design*
  - f. Relationship to other structures*
  - g. Impact on streetscape and near views*
  - h. Impact on cityscape and distant views*
  - i. Impact on the skyline'*



2.18 Paragraph 4.9 states that:

*'Tall buildings need to set exemplary standards in design because of their scale, mass, wide impact and likely longevity. Good design will take the opportunities available for improving the character and quality of an area and respond to local character and history (NPPF paragraphs 58 and 64). It is important that the required high standard of architectural quality is maintained throughout the process of procurement, detailed design, and construction, through the use of conditions and reserved matters.'*

The references to NPPF paragraphs 58 and 64 have been superseded since the document was issued, and the corresponding paragraphs in the 2021 NPPF are paragraphs 130 and 134 respectively.

2.19 Para 4.10 notes that *'consideration needs to be given to a tall building's contribution to public space and facilities. This applies both internally and externally, including the provision of a mix of uses (especially on the ground floor of towers), as part of a well-designed public realm.'*

2.20 Section 5 deals with assessing proposals. The guidance concludes that:

*'If a tall building is harmful to the historic environment, then without a careful examination of the worth of any public benefits that the proposed tall building is said to deliver and of the alternative means of delivering them, the planning authority is unlikely to be able to find a clear and convincing justification for the cumulative harm.'*

#### Historic England Advice Note 4 – Tall Buildings – Second edition consultation draft (2020)

2.21 This draft updated version of the Historic England Advice Note 4 – Tall Buildings (2015) (Ref. 2-8) was issued for public consultation, with comments invited until 28 May 2020. The guidance within the draft Advice Note is not significantly different to that in the existing document, and the updates are primarily designed to reflect changes to the policy and guidance, including the National Planning Policy Framework and the National Design Guide, to take account of changing technology for visualising proposed tall buildings, and to give greater focus to plan-led approaches to tall buildings.

#### Regional Planning Policy and Guidance

##### The London Plan – the Spatial Development Strategy for Greater London (2021)

2.22 The London Plan is 'the overall strategic plan for London' (Ref. 2-9). The policies most relevant to townscape and visual impact are found in Chapter 3, 'Design,' and Chapter 7, 'Heritage and Culture.'

2.23 Policy D1 on 'London's form, character and capacity for growth' highlights the necessity for Boroughs to identify an area's capacity for growth by undertaking an assessment of the 'characteristics, qualities and values of different places'. This should include the consideration of urban form and structure, historical evolution and heritage assets, and views and landmarks.

2.24 Policy D3 on 'Optimising site capacity through the design-led approach' states that 'All development must make the best use of land by following a design-led approach that optimises the capacity of sites, including site allocations.' The policy states that development proposals should 'enhance local context by delivering buildings and spaces that positively respond to local distinctiveness through their layout, orientation, scale, appearance and shape, with due regard to existing and emerging street hierarchy, building types, forms and proportions.' Development should 'respond to the existing character of a place', and 'provide active frontages and positive reciprocal relationships between what happens inside the buildings and outside in the public realm to generate liveliness and interest.' The policy further states that development design should 'be of high quality, with architecture that pays attention to detail,' and use 'attractive, robust materials which weather and mature well'.

2.25 Policy D8 on 'Public realm' states that development plans and proposals should ensure that the public realm is '...well-connected, related to the local and historic context...'. It states that there should be 'a mutually supportive relationship between the space, surrounding buildings and their uses' and that development should 'ensure that buildings are of a design that activated and defines the public realm, and provides natural surveillance.'

2.26 Policy D9 on 'Tall buildings' notes that the height of what is considered a tall building should be defined in development plans and identified on maps, and that although this will vary in different parts of London, 'should not be less than 6 storeys or 18 metres'. The policy also notes that 'tall buildings should only be developed in locations that are identified as suitable in Development Plans.'

2.27 Policy D9 also notes that the views of buildings from different distances should be considered. This includes long-range views (developments should make a 'positive contribution to the existing and emerging skyline and not adversely affect local or strategic views'), mid-range views (developments should make a 'positive contribution to the local townscape in terms of legibility, proportions and materiality'), and immediate views (developments should 'have a direct relationship with the street, maintaining the pedestrian scale, character and vitality of the street'). Proposals should 'take account of, and avoid harm to, the significance of London's heritage assets and their settings' and should 'positively contribute to the character of the area.' It goes on to note that the architectural quality and materials should be of an exemplary

standard. Buildings that are situated in the setting of a World Heritage Site 'must preserve, and not harm, the Outstanding Universal Value of the World Heritage Site, and the ability to appreciate it.' Buildings near the River Thames should protect the open quality of the river, including views.

2.28 Policy HC3 on 'Strategic and Local Views' states that 'development proposals must be assessed for their impact on a designated view if they fall within the foreground, middle ground or background of that view.' The Mayor will identify Strategically-Important landmarks within designated views and will 'seek to protect vistas towards Strategically-Important Landmarks by designating landmark viewing corridors and wider setting consultation areas. These elements together form a Protected Vista'. The Mayor will 'identify and protect aspects of views that contribute to a viewer's ability to recognise and appreciate a World Heritage Site's authenticity, integrity and attributes.'

2.29 Policy HC4 on the 'London View Management Framework' states that 'development proposals should not harm, and should seek to make a positive contribution to, the characteristics and composition of Strategic Views and their landmark elements.' It notes that development should not be 'intrusive, unsightly or prominent to the detriment of the view', when it falls within the foreground, middle, or background of a designated view. With regard to protected vistas, development should protect and enhance, not harm, the viewer's ability to recognise and appreciate the strategically important landmark, and it should not harm the composition of the protected vista, whether it falls within the wider setting consultation area or not.

#### London View Management Framework Supplementary Planning Guidance (2012)

2.30 In March 2012, the Mayor published the 'London View Management Framework Supplementary Planning Guidance' ('LVMF') (Ref. 2-10) which is designed to provide further clarity and guidance on the London Plan's policies for the management of these views. The LVMF view 5A.1 from Greenwich is potentially relevant to consideration of development on the Site. This TVIA provides an assessment of the effect on this view (see Chapter 6: Potential Effects).

#### London World Heritage Sites – Guidance on Settings Supplementary Planning Guidance (2012)

2.31 This Supplementary Planning Guidance (SPG) (Ref. 2-11) was adopted in March 2012. The intention of the SPG is stated to be '...to ensure a more consistent interpretation of setting and understanding of their importance in contributing to an appreciation of Outstanding Universal Value to help support consistency in decision making...' in support of the policies within the London Plan, including Policy 7.10 on World Heritage Sites (WHS).

2.32 The SPG includes a draft Statement of Outstanding Universal Value (OUV) for the Maritime Greenwich WHS (a final Statement was subsequently approved in 2013 – see below, 'Maritime Greenwich World Heritage Site Management Plan, Third Review (2014)'). It sets out in general terms the elements of setting that may affect WHS, which include views in, out and across WHS. It notes that 'The towers of Canary Wharf have a profound impact on the setting of the Maritime Greenwich World Heritage Site but they are at a sufficient distance to allow the significance of the axial view from the Royal Observatory to be appreciated.'

2.33 It provides a set of criteria for the assessment of the effect of development on the OUV of the Maritime Greenwich WHS in Implementation Point 14.

#### Lower Lea Valley Opportunity Area Planning Framework (2007)

2.34 The Site falls within the Lower Lea Valley Opportunity Area (LLVOA) (Ref.2-12), specifically the Poplar Riverside Sub Area. This is illustrated in Figure 4.12 – Poplar Riverside Sub-area Site Plan on page 74.

2.35 The vision for the LLVOA, as stated in Section 2: 'Vision and Development Principles', is as follows:

*'To transform the Lower Lea Valley to become a vibrant, high quality and sustainable mixed use city district, that is fully integrated into the urban fabric of London and is set within an unrivalled landscape that contains new high quality parkland and a unique network of waterways.'*

2.36 Under the heading 'Sub-Area Proposed Components' it is noted that the Poplar Riverside Sub-area has the potential capacity to deliver between 1,750 and 1,850 residential units in a range of densities between 65 and 275dph (225-725 hrph), with the majority of housing delivered at 275dph. It continues, 'Of the total potential capacity, 800 units could be delivered through development of new residential areas, 800 through potential intensification of existing residential areas and 150 units through mixed use residential development with retail and office uses, principally on waterfront sites, including Ailsa Street'. Regarding commercial uses, the document notes that 'The strategic assumptions of industrial land release in the LLV include the potential release of up to 16.3ha of existing industrial land in the sub-area principally along the River Lea corridor, and in high PTAL areas.'

#### City in the East Plan (2016)

2.37 The Site falls within a region defined by the GLA as the 'City in the East'. The City in the East plan (October 2016) (Ref.2-13) promotes the development of the east of London as an integrated part of the capital. The plan estimates that this region has the potential to provide at least 260,000 new homes and 360,000 jobs. It includes the Opportunity Areas along the

River Thames and the Lee River Valley, London Bridge, Canada Water, Deptford Creek/Greenwich Riverside and Isle of Dogs.

#### Housing Zones (2016)

- 2.38 The Site falls within the Poplar Riverside Housing Zone, as defined in the GLA's publication Housing Zones (Ref.2.14), published in March 2016. It is currently envisaged that the zone will provide a total of 4368 new homes (1226 of which would be affordable) and 6068 new jobs.

#### London's Natural Signatures: The London Landscape Framework, January 2011

- 2.39 This guidance document was issued by Natural England in 2011 (Ref. 2-15). It divides London into 22 Natural Landscape Areas and identifies the key natural characteristics, or 'Natural Signatures', of those areas. The Site is located within the 'Lea River Valley' Natural Landscape Area, which consists of The River Lea or Lee, a major tributary river to the Thames, and its wide floodplain. The key natural signature of the Lea Valley landscape type is stated as *'the river itself, although highly modified, and the marshes that typify its floodplain'*. The Site is located within a heavily urbanised part of the Lea River Valley.

#### Maritime Greenwich World Heritage Site Management Plan, Third Review (2014)

- 2.40 The WHS Management Plan (2014) (Ref. 2-16) sets out a framework for the protection, conservation and management of the WHS between 2012-17. It includes the approved version of the Statement of OUV for the WHS. There are nine overarching goals for the WHS, including to *'protect, preserve, and enhance, where possible, the Outstanding Universal Value of Maritime Greenwich World Heritage Site'*. The Management Plan states that in considering how tall buildings clusters evolve, the LBTH should take account of specific views from the WHS, and examine ways in which the significance of the Grand Axis is recognised. It further states that development should step down in height and scale towards the WHS, provide visual layering, and demonstrate how it fits within the Canary Wharf cluster.

#### Local Planning Policy and Guidance

#### London Borough of Tower Hamlets: Local Plan 2031: Managing Growth and Sharing Benefits (2020)

- 2.41 The Local Plan 2031 (Ref. 2-17) was adopted by the LBTH in January 2020. It provides spatial policies, development management policies and site allocations that set out *'how the borough of Tower Hamlets will grow and develop from now on until 2031'*. It is accompanied by a Policies Map and is intended to sit alongside any future neighbourhood plans and area action plans which will provide more detailed planning guidance.

- 2.42 A number of evidence base documents were produced to inform the proposed policies, including the *'Tall Buildings Study'* (2018) (Ref. 2-18), the *'Tower Hamlets Conservation Strategy 2017-2026'* (2017) (Ref. 2-19) and the *'Urban Structure and Characterisation Study Addendum'* (2016) (Ref. 2-20).

- 2.43 The Local Plan identifies 24 places within Tower Hamlets, illustrated on Figure 4. The Site falls within the 'Poplar Riverside' place.

- 2.44 Policy S.SG2, 'Delivering sustainable growth in Tower Hamlets' states that development will be supported where it *'...delivers managed growth, through i. good design, ii. preserving or enhancing the character and setting of the area, and iii. not resulting in unacceptable impacts on the natural and historic environment and its assets...'*

- 2.45 Policy S.DH1, 'Delivering high quality design' states that development is required to *'...meet the highest standards of design, layout and construction which respects and positively responds to its context, townscape, landscape and public realm...'* and that developments must –

- *'be of an appropriate scale, height, mass, bulk and form in its site and context'*
- *represent good urban design; provide coherent building lines, roof lines and setbacks, complement streetscape rhythm and associated landscapes...*
- *ensure the architectural language: scale, composition and articulation of building form, design of detailing, elements and materials applied on elevations, complements and enhances their immediate and wider surroundings*
- *protect important views of and from landmark buildings and vistas*
- *use high quality design, materials and finishes to ensure buildings are robust, efficient and fit for the life of the development*
- *create well-connected, inclusive and integrated spaces and buildings...'*

- 2.46 Policy D.DH2, 'Attractive streets, spaces and public realm', states that *'Development is required to contribute to improving and enhancing connectivity, permeability and legibility across the borough...'* and *'...is required to positively contribute to the public realm...'*

- 2.47 Policy D.DH4, 'Shaping and managing views' states that *'development is required to positively contribute to views and skylines that are components of the character of the 24 places in Tower Hamlets. Intrusive elements in the*

*foreground, middle ground and backdrop of such views will be resisted.'* It goes on to state that development will be required to demonstrate how it, inter alia, complies with the LVMF and World Heritage Site Management Plans; positively contributes to an identified *'skyline of strategic importance, forming from the silhouettes of tall building clusters around Canary Wharf'*; *'preserves or enhances the prominence of borough-designated landmarks and the skyline of strategic importance in the borough-designated views'*, as well as views identified in conservation area appraisals and management guidelines; and *'preserves or enhances townscape and views to and from the site which are important to the identity and character of the place.'*

- 2.48 The borough-designated views are set out in Figure 6. A number of landmark buildings – Christ Church, Spitalfields; St. Paul's Church; St. Anne's Church; and Balfron Tower – and the cluster at Canary Wharf form the focus of individual views. Two of the identified views are considered relevant to the Proposed Development – View 5 from Langdon Park to Balfron Tower; and View 6 from East India Dock Road to Balfron Tower – and these have been illustrated in this TVIA.

- 2.49 Policy D.DH6: 'Tall buildings' sets out a list of criteria that a tall building proposal will be expected to satisfy, including to *'be of a height and scale, mass and volume that are proportionate to their role, function and importance of the location in the local, borough-wide and London context; and take account of the character of the immediate context and of their surroundings'*; to *'achieve exceptional architectural quality and innovative and sustainable building design...'*; and *'enhance the character and distinctiveness of an area without adversely affecting designated townscapes and landscapes... or detracting from important landmarks, heritage assets, key views and other historic skylines, and their settings...'*; and *'provide a positive contribution to the skyline during both the day and night time'*.

- 2.50 Part 2 of the policy states that tall buildings will be directed towards designated Tall Buildings Zones, shown on Figure 7. The Site lies in close proximity to two of these zones: Blackwall; and Leamouth. East India Dock Road forms the northern boundary of both zones.

- 2.51 LBTH are in the early stages of consultation on a Tall Buildings SPD, with a draft document expected to be produced at the time of writing (October 2021). A workshop presentation document relating to the Isle of Dogs and South Poplar area (Ref. 2-21) sets out the background and context to the production of the SPD, including the policies set out in the Local Plan, and sets out some initial proposed design guidance.

#### LBTH Urban Structure and Characterisation Study (2009)

- 2.52 The Urban Structure and Characterisation Study (Ref. 2-22) was prepared for the LBTH to inform the Local Development

Framework and other documents and was issued in 2009. It divides the Borough into character areas and the Site is identified as part of the 'Poplar Riverside' character area. The character area is described as suffering from a substantial degree of severance, due to the area being surrounded by Limehouse Cut to the north, the River Lea to the east, the DLR to the west and East India Dock Road to the south. It notes:

*'Poplar Riverside is divided to a further extent by the large and busy road that is the A12, which along with East India Dock Road is a highway. The industrial areas to the east of the A12 comprise predominantly daytime activities, which only adds to the feeling of isolation. The grain is of a coarse nature in this area, with many of the industrial uses enclosing medium to large-size blocks, including the large gas-holder site on Leven Road. The considerable number of post-war housing estates in the area also exacerbates this.'*

#### LBTH High Density Living SPD (2020)

- 2.53 This SPD (Ref. 2-23) *'...provides guidance to shape high density development...'* It sets out a series of design guidelines and includes guidance on different building typologies, including stand-alone towers and towers with podiums. The key design guidelines to be considered for stand-alone towers focus on publicly accessible space at street-level, provision for servicing and deliveries, communal amenity space, and consideration of the location of entrances and uses. The key design guidelines to be considered for towers with podiums focus on similar issues, with particular attention also given to the arrangement of active and ancillary uses to provide clear fronts and backs and active ground floors.



### 3 Assessment Methodology and Significance Criteria

3.1 This chapter presents the following:

- Identification of the information sources that have been consulted during the preparation of this TVIA;
- Details of the consultation undertaken with respect to townscape and visual effects;
- The methodology behind the assessment of townscape and visual effects, including the criteria for the determination of sensitivity of receptor and magnitude of impact on the existing or 'baseline' condition;
- An explanation as to how the identification and assessment of townscape and visual effects have been reached; and
- The significance criteria and terminology for assessment of the residual effects to townscape and visual receptors as a result of the Proposed Development considered on its own and considered in the context of other proposed and consented 'cumulative' schemes.

3.2 The following sources of information that define and explain the Proposed Development have been reviewed and form the basis of the assessment of likely significant townscape and visual effects:

- The detailed plans, sections and elevations for approval;
- Parameter Plans for approval;
- The Design and Access Statement (DAS);
- The Design Code;
- The Development Specification; and
- The Accurate Visual Representations (AVRs) contained within Chapter 6 of this TVIA.

#### Assessment Methodology – Townscape and Visual Effects

3.3 This section explains the method that was adopted to carry out the TVIA. It is based on the principles set out in the third (2013) edition of 'Guidelines for Landscape and Visual Impact Assessment' (GLVIA) (Ref. 2-24), produced by the Landscape Institute with the Institute of Environmental Management and Assessment. Also relevant to the method of assessment is Planning Practice Guidance (DCLG) (Ref. 2-5), which sets out national guidance on urban design against which townscape can be assessed.

3.4 The assessment method is described in detail below. In general terms it is carried out as follows:

- Buildings, open spaces, townscape and views that have the potential to be affected by the Proposed Development, particularly those that have been previously identified as significant by designation or in other ways, are identified.
- The impacts on these buildings, open spaces, townscape and views are studied as part of the process of developing the design. This process includes computer-based modelling, so that the visual impact can be tested.
- The effects of the Proposed Development, in the form in which it is submitted for planning permission, on the identified elements and views, are assessed by the townscape assessors. This assessment is informed by computer generated images showing 'as existing' and 'as proposed' views from selected viewpoints. Images showing the effect of the Proposed Development in combination with relevant 'cumulative' schemes are also provided. The images were prepared by Miller Hare. LBTH officers were consulted on the viewpoints; the list takes into account their response to this consultation in the Scoping Opinion.

3.5 The process as described is an iterative one that informs the design of the Proposed Development, so that any potential for adverse impacts can be considered as an integral aspect of the development of the design.

#### Study Area

3.6 The visual study area extends approximately 3.9km from the Site, the distance to the LVMF viewpoint from Greenwich Park (LVMF 5A.1). The townscape study area covers an area shown in Figure 2-3 [Townscape Character Areas] (up to approximately 1.7km from the Site). Reasoning to support the selection of this study area is provided in the sections below.

#### Methodology for Determining Baseline Conditions and Sensitive Receptors

##### Baseline Characterisation – Townscape Character Areas

3.7 An assessment was made of the Site and its surroundings in their existing state. This analysed the physical characteristics and the character of the townscape and considered the current status of the Site.

3.8 The identification of townscape character areas and built heritage assets in the study area was carried out following a study of the historical development of the area, which was made with reference to the following publications:

- The Buildings of England, London 5: East, Bridget Cherry, Charles O'Brien and Nikolaus Pevsner, Yale UP, 2005 (Ref. 2-25);

- Survey of London: volumes 43 & 44, Poplar, Blackwall and Isle of Dogs, Hermione Hobhouse (General Editor), 1994 (Ref. 2-26); and
- The History of London in Maps, Barker and Jackson, Guild Publishing, London, 1990 (Ref. 2-27).

3.9 The present-day condition of the study area was ascertained by a site visit in October 2020 (these conditions are not expected to have changed significantly between October 2020 and October 2021) supported by a study of maps and aerial photographs (available on the internet as an integrated set of data at [www.maps.google.co.uk](http://www.maps.google.co.uk)), and the Pevsner volume referred to above. The site visit allowed the accuracy of record data to be verified. Record photographs were taken on site visits.

3.10 The townscape study area is formed of those areas around the Site on which the Proposed Development could have a significant townscape effect, informed by site visits and desk study as outlined above. Townscape is characterised by dividing the study area into geographical areas which have readily identifiable characteristics in common, 'townscape character areas'. These characteristics may include topography; other natural characteristics such as waterways; patterns of land use; urban grain; and building form. Where there are major elements of infrastructure such as roads and railways, these often serve to divide one area from another. The division of the study area into townscape character areas ('TCAs') is carried out by a combination of professional judgement based on site investigation, and the study of documents, as described above. This exercise also takes into account significant designations such as conservation areas and townscape characterisations produced by the LBTH (e.g. the Urban Structure and Characterisation Study (2009)) or by others, as well as site allocations and any relevant associated guidance forming part of the local development plan.

3.11 The judgement made as to the geographic extent of the likely significant effects of the Proposed Development on townscape was informed by the study discussed above, and by previous experience of the effect of developments of a similar scale to the Proposed Development in this part of London. The visual study undertaken during the course of the assessment, together with the examination of a 'Zone of Visual Influence' Study ('ZVI') enabled this judgment to be validated. The ZVI is provided in Appendix A6.

##### Identification of Built Heritage Assets

3.12 The identification of TCAs and the sensitivity of these has been informed by the above-ground Built Heritage Assets located in the area around the Site. Built heritage assets, comprising relevant conservation areas (CAs), listed buildings (LBs), and non-designated heritage assets (NDHAs) have been identified using information derived from the National

Heritage List for England website<sup>1</sup> and the Local Planning Authority website<sup>2</sup>. Non-designated heritage assets have been taken to be locally listed buildings (LLBs) identified by the LBTH.

3.13 All designated heritage assets and locally listed buildings (including small scale structures and war memorials) within the TCAs described later in this Volume of the ES have been identified and, where relevant, have informed the assessment of the sensitivity of those TCAs and views within which they fall.

3.14 The assessment of the effect of the Proposed Development on above-ground heritage assets, considered as receptors and taking into account heritage significance, is provided within **ES Volume 2: Part 2 (Built Heritage Assessment)**. Part 2 considers the effect on all above-ground heritage assets located within 1.5km of the centre of the Site (with some additions and exclusions).

3.15 Other heritage assets further from the Site may appear within individual views considered in the visual assessment; any effect with regard to them is an intrinsic part of the overall assessment of the effect of the Proposed Development within such views.

##### Evolution of the baseline

3.16 Should the Proposed Development not come forward, it is likely that the Site would remain the same as at present. The Site's effect on the surrounding townscape, and its visual impact, would remain as per the existing condition.

##### Phasing

3.17 The project will be delivered over approximately ten years and eight months, across four overlapping phases, for Phases A to D.

3.18 Phase A involves demolition of all existing structures and comprises the construction of the Detailed Proposals, and Phases B, C and D form the construction of the Outline Proposals.

3.19 The boundaries of the Phases are illustrated on **Figure 2.1 of ES Volume 1, Chapter 2: EIA Methodology**. See also ES Volume 1, Chapter 5 Demolition and Construction for the Demolition Plan and Indicative Demolition and Construction Programme.

3.20 The maximum scale and layout parameters reflect the maximum built form of development being sought for approval across the Outline Proposals of the Site where design parameters are applicable. The maximum (rather than the

<sup>1</sup> [historicengland.org.uk/listing/the-list](http://historicengland.org.uk/listing/the-list)

<sup>2</sup> [towerhamlets.gov.uk/N](http://towerhamlets.gov.uk/N)

minimum) built form is the most likely development massing configuration for the Proposed Development. The likely townscape and visual effects of the Proposed Development have therefore been defined on the basis of the maximum built form of development as per the maximum scale and layout parameters for the Outline Proposals, as this would result in the greatest range of impacts.

#### Identification of Viewpoint Locations

3.21 A study was undertaken to establish a set of potential viewpoint locations from which 'before and after' views are provided. The study area was centred on the Site and was limited to locations from which the Site can be seen, or from which new buildings on it will be seen at the height proposed. The study area for local and medium range views extends to approximately 980m, the distance to the Star Lane Park viewpoint. The study area for long range views extends to approximately 3.9km, the distance to the view from the General Wolfe Statue, Greenwich Park. At a distance greater than this, development of the scale envisaged (i.e. of the Proposed Development) would not be a significant visual presence.

3.22 Within this study area, four types of viewing location were identified:

- Views that have been identified as significant, by the LBTH or others including the neighbouring local authorities (London Borough of Newham and Royal Borough of Greenwich), e.g. in planning policy and guidance documents and conservation area appraisals;
- Other locations or views of particular sensitivity, including those viewpoints in which the Proposed Development may significantly affect the settings of designated heritage assets;
- Representative townscape locations from which the Proposed Development would be visible; and
- Locations where there is extensive open space between the viewer and the Proposed Development, so that it would be prominent rather than obscured by foreground buildings. This includes areas of open space that are important in a local context, e.g. for leisure purposes.

3.23 The set of viewpoints was chosen to cover:

- The range of points of the compass from which the Proposed Development would be visible;
- A range of distances from the Site; and
- Different types of townscape area.

3.24 Possible locations in these categories within the study area were identified based on an examination of maps and aerial photographs; the documents referred to above; maps of

conservation areas; maps and lists of listed buildings; and good prior knowledge of the area. The study area and the possible locations were then visited to establish candidate viewpoints and views testing carried out using digital modelling in VuCity. The results of the ZVI study noted above informed the process of views selection.

3.25 A proposed list of 32 views was discussed with officers from the LBTH at the pre-application stage. This was expanded to include a further view taking in Balfron Tower from Brownfield Street – this was a response to feedback from Historic England. The list was subsequently sent to the LBTH for agreement as part of the scoping process. A further view was added as a result of the scoping response from the LBTH (Memorial Recreation Ground, LB Newham).

#### Sensitivity of Receptors

3.26 The sensitivity of the townscape or of the view in its existing state (the latter as experienced by a viewer or 'visual receptor' in the location in question) has been assessed as **high, medium** or **low** (or at an intermediate point between these sensitivity levels, e.g. 'low to medium').

3.27 The sensitivity of the townscape or view is dependent on:

- The importance/value of the townscape or view; and
- The susceptibility to change of the receptor (this includes, for views, the nature and expectation of the viewer).

3.28 The importance of a view or TCA is determined by any recognition that it may have, the importance of elements within it, and by its amenity value. In terms of views, recognition includes viewpoints identified by the LBTH or others in planning documents, and viewpoints visited by large numbers of people. This includes relevant views identified in the LVMF. In terms of townscape receptors, recognition includes heritage designations e.g. of a conservation area.

3.29 The value of a view or TCA is likely to be higher if it overlooks/ includes important heritage assets (see below). In respect of townscape, the overall character and coherence of the townscape is relevant to an assessment of its value and quality. In respect of views, the value and quality of the view is a reflection of its visual interest, its character and coherence, and any attractive or notable pictorial or compositional qualities.

3.30 With regard to amenity value, locations such as parks and riverside walkways which are used for leisure purposes are considered to be more sensitive in visual and townscape terms than everyday streetscapes with no heritage designation.

3.31 The assessment of value and importance takes into account the following heritage assets and their settings, in decreasing order of importance (but this is only a general guide – see the paragraph below on moderation):

- World Heritage Sites, Grade I or II\* Listed Buildings and Registered Parks and Gardens, above-ground Scheduled Monuments;
- Grade II Listed Buildings, Conservation Areas and Registered Parks and Gardens; and
- Non-designated heritage assets (e.g. locally listed buildings).

3.32 The susceptibility to change of a townscape receptor includes consideration of its ability to accommodate the type of change proposed. The susceptibility to change of a viewer or viewers experiencing a view includes consideration of the nature and expectation of the viewer(s), which reflects the occupation or activity of the people who will gain the view. Those experiencing a view are taken to be the general public affected by development, taking into account the differing interests and expectations likely to be found in residents, visitors and those who work in a place. For example, people who walk in a park in their leisure time or people in their street of residence are likely to have a higher sensitivity than people at their place of work, or people on the move along main roads.

3.33 The assessment of sensitivity is a matter of judgement, and a number of factors are likely to be relevant to each individual receptor, such that the assessment of sensitivity will be different in every case. However, the following examples are provided by way of general guidance; it should be noted that the assessment of sensitivity may fall between the different levels set out below.

3.34 A TCA largely comprising a World Heritage Site or a large number of grade I and II\* buildings, with a strongly coherent form of development and including buildings of high visual quality, would likely be of high sensitivity. A TCA largely comprising a conservation area, open spaces or settled residential areas, with considerable character and coherence evident in the form of development, would likely be of medium sensitivity. A TCA with development of little notable character or coherence, buildings of generally low or mediocre quality, and few if any heritage assets may be considered of low sensitivity. Alternatively, some townscapes of robust character, such that they could easily accommodate change – for example, an overwhelmingly commercial environment – may also be considered to be of low sensitivity.

3.35 In respect of views, the overall sensitivity will depend on the susceptibility to change of the people experiencing the view, as previously noted, and its value/ importance. A view which is notably coherent and characterful, which contains highly graded heritage assets in a prominent manner, which is from an identified viewpoint location, and which is experienced by people with the specific expectation of enjoying the view, is likely to be of high sensitivity. A view from a point of some sensitivity due to heritage designations or amenity value

– e.g. conservation areas, open spaces or settled residential areas – and which displays considerable visual interest and compositional quality, experienced largely by residents and people in their leisure time, may be considered of medium sensitivity. A view that has no particular qualities of character and coherence and that is dominated by buildings of poor or mediocre visual quality, or a view which is transient in nature or from a location within a business or other largely non-residential environment, may be considered of low sensitivity.

3.36 The overall assessment of the sensitivity of the receptor under consideration may be moderated to take into account a judgement about its susceptibility to change in the round. For example: a listed building or a part of a conservation area may be a prominent aspect of a view, or it may be present in the view but only incidentally; TCAs include within them areas of greater and lesser quality; and so on.

#### Methodology for Determining Magnitude of Change (Impact) and Significance of Effects

3.37 The assessment of the significance of the effects of any proposed new development on existing townscape and views is a matter of judgement. The assessments in this document have been made on the basis of professional judgement, which took into account relevant planning policies and guidance. The assessment has been based on the following method.

3.38 An assessment was made of the likely significance of the effect that the Proposed Development would have on the receptor under consideration. This is a function of the sensitivity of the receptor as existing (as explained in the previous section), together with the magnitude of the change (i.e. impact) resulting from the Proposed Development.

3.39 The magnitude of the change (impact) resulting from the Proposed Development is assessed **as high, medium, low** or **very low** using the following criteria:

- **High:** considerable change to the townscape or view;
- **Medium:** an obvious change to the townscape or view;
- **Low:** a small change to the townscape or view that would not be readily noticed; or
- **Very Low:** there would be minimal change to the townscape or view.

3.40 The assessment of the magnitude of change includes consideration of a range of factors, including the loss of existing features on the Site, and the overall scale and nature of the visibility of the Proposed Development within a TCA or view; the degree to which the effect of the Proposed Development's scale, form, appearance and character are consistent with or contrast with that of the existing character of the view or TCA;



the geographical extent of the effect; and the duration of effect. The assessment of magnitude will be different in every case; however, the following examples are provided by way of general guidance.

3.41 An impact of high magnitude is likely to involve extensive visibility of the Proposed Development, and/or visibility at an apparent scale that may be as large or larger than most existing elements in the townscape or view, or the appearance of the Proposed Development may be in notable contrast to the existing character of the townscape or view. An impact of medium magnitude is likely to involve considerable visibility of the Proposed Development, and/or visibility at an apparent scale similar to existing elements in the townscape or view, and/ or it may form a noticeable contrast with the general existing character of the townscape or view. A change of low magnitude is likely to involve a relatively small degree of visibility of the Proposed Development, and/or visibility at a similar or lesser apparent scale than existing elements in the townscape or view; or it may be of greater visibility and scale, but consistent with the existing character of the townscape or view to the extent that it would be little noticed.

3.42 These two measures – sensitivity and magnitude – are combined to provide a measure of the significance – **major, moderate, minor or negligible** – of the effect on townscape or views which will result from the Proposed Development, the most significant effects being effects of high magnitude on receptors of high sensitivity. The terms in the boxes in Table 2-1 indicate the significance which results from the relevant combination of magnitude of change and sensitivity. Likely significant effects, for the purposes of EIA assessment, are those which fall in the shaded area of Table 2-1 (i.e. those of ‘moderate’ significance or above).

		Sensitivity of Receptor		
		High	Medium	Low
Magnitude of change	High	Major	Moderate to Major	Moderate
	Medium	Moderate to Major	Moderate	Minor to Moderate
	Low	Moderate	Minor to Moderate	Minor
	Very Low	Negligible/ Minor	Negligible/ Minor	Negligible

Table 2-1 Determination of the Significance of Effect

3.43 The magnitude of change and / or the sensitivity may be assessed as being at an intermediate point between the criteria set out above e.g. a change of ‘medium to high’ magnitude. Where this is the case and the magnitude and / or sensitivity criteria are intermediate, all possible significance criteria that fall under the combinations of the magnitude and sensitivity criteria have been considered and the most appropriate significance assessment, based on professional judgement, chosen. Similarly, an effect of very low magnitude on a receptor of medium or high sensitivity may result

in an effect that is negligible, negligible to minor or minor in significance, and the most appropriate assessment based on professional judgement is made.

3.44 Effects have also been assessed qualitatively as beneficial, adverse or neutral in respect of the nature of their effect on the receptor under consideration. Within any given view or area of townscape that is being assessed, there may be both beneficial and adverse effects as a result of the Proposed Development. The question of whether an effect is beneficial or adverse relies on a judgement of the qualitative effect in the round and is a ‘net equation’. It is not necessarily related directly to the degree of sensitivity or to the magnitude, or, consequently, to the significance of the effect. A neutral effect is one in which there is no noticeable beneficial or adverse effect, or in which the effect is considered neither beneficial nor adverse overall, having made a ‘net equation’ judgment that takes into account both beneficial and adverse impacts. Any effect, including one that is significant (because of the combination of magnitude and sensitivity), may be neutral in respect of the qualitative effect on the receptor under consideration.

3.45 By way of example, a beneficial effect in terms of views could derive from the high architectural quality of a proposal, or from providing a focal point in a view with a directional quality, or from coherently consolidating an existing skyline composition. A beneficial effect in townscape terms could derive from the reinforcement of an existing pattern and form of development in a coherent manner, for example. An adverse effect in terms of views could derive from the introduction of a building of low architectural quality, or of a form or scale of development which disrupts views with strong compositional or picturesque qualities. An adverse effect in townscape could derive from a form and scale of development which contrasts (in a disruptive manner) with an established high-quality townscape, for example. A neutral effect in views and townscape could derive from a balanced judgement in which both positive and negative effects such as the examples cited above are apparent, and therefore a neutral effect can apply to effects that are ‘significant’ as well as situations in which the Proposed Development has no significant effect.

3.46 The GLVIA suggests (para 6.28) that ‘an informed professional judgement should be made as to whether the visual effects can be described as positive or negative (or in some cases neutral) in their consequences for views and visual amenity. This will need to be based on a judgement about whether the changes will affect the quality of the visual experience for those groups of people who will see the changes, given the nature of the existing views’. The present assessment offers informed professional judgements based on this advice.

3.47 Effects are also assessed in relation to duration and spatial scale. The assessments of duration and spatial scale are provided within the table at the end of the assessment (Table 2-5) and the following criteria are used:

- ‘Short to medium-term’ effects are considered to be those associated with the Site demolition and construction works;
- ‘Long-term’ effects are those associated with the completed and operational Proposed Development;
- ‘Site’ or ‘local’ effects are those affecting the Site or neighbouring receptors;
- ‘Borough’ effects are those which are likely to occur to receptors within the administrative boundary of the LBTH;
- ‘Sub-regional’ effects are those affecting boroughs neighbouring the LBTH; and
- ‘Regional’ effects are those affecting receptors across Greater London.

3.48 In cases where the Proposed Development results in no change to a receptor, an assessment of ‘no effect’ is given, and this is considered ‘not significant’.

#### Methodology for Determining Demolition and Construction Effects

3.49 The methodology used for determining demolition and construction effects is the same as that set out above for operational effects. The townscape and visual effects of the demolition and construction process will vary in intensity across the programme, as is normal in any construction project. The assessment takes into account the temporary nature of the maximum effect with regard to each receptor.

#### Assessment Method – approach to assessment of outline phases

3.50 The Applicant is seeking permission for a Proposed Development that includes both outline and detailed Proposals. As such, the level of detail submitted as part of the planning application relating to each element of the Proposed Development varies.

3.51 Parameter Plans set out the maximum footprints and the maximum height (AODs) of each part of the outline component of the Proposed Development. Together, these form the maximum envelope parameters (‘maximum parameters’) within which buildings could be located. For the purposes of this ES and when phasing is considered, the Proposed Development is assessed in the context of the maximum massing parameters sought for approval (at the maximum height AODs noted in the Parameter Plans). This is so the ES considers the ‘worst case’ in respect of phasing effects, as the maximum massing represents the greatest volume of development that can come forward across the Site, and therefore results in the greatest potential for impacts.

3.52 The likely effects as a result of the phased delivery of the Proposed Development are defined based on professional opinion and are informed by the analysis undertaken in respect of the completed development under the maximum massing parameters.

3.53 This section also considers the potential for cumulative effects i.e. those associated with the Proposed Development (under the maximum massing parameters) in conjunction with other surrounding development schemes.

#### The Design Code

3.54 The Design Code document submitted with the planning application sets out rules which provide a further level of detail beyond that contained within the Parameter Plans and which moderate the way in which the parameters could be built out. Of particular relevance to the townscape and visual effect of the Proposed Development are the plot by plot rules governing:

- Form, alignment and width of routes.
- Building lines, stipulating those instances where setbacks and projections are permitted. Rules also apply to balconies and bay windows, which are not permitted to extend beyond the boundary line;
- Building uses for ground and upper levels;
- Building entrances and their role in ensuring active frontages;
- Building scale and massing, including base, middle and top components;
- Building elevations, including window openings and balconies;
- Facing materials and windows/glazing;
- Private amenity; and
- Public realm and landscape.

3.55 Where relevant, therefore, the Design Code is taken into account in the assessment of the effect of the Proposed Development on the receptor in question.

#### Accurate Visual Representation Production

3.56 For each of the identified views in the assessment which follows, there are images of the view ‘as existing’, showing baseline conditions; ‘as proposed’, showing the Proposed Development in the image; and ‘as proposed with cumulative schemes’, showing the Proposed Development and cumulative schemes in the same image.

3.57 'As proposed' images are provided as 'Accurate Visual Representations' (AVRs). AVRs are produced by accurately combining images of the Proposed Development (typically created from a three-dimensional computer model) with a photograph of its context as existing. The AVRs were produced in accordance with the LVMF and correspond to Type 4 images as set out in the Landscape Institute's Technical Advice Note 06/19 'Visual Representation of Development Proposals', and the detailed method by which AVRs are produced is described in Appendix A5 to this Part 1 of Volume 2 of the ES.

3.58 AVRs have been provided either as rendered (photorealistic) images or as 'wirelines' (diagrammatic representations showing the outline of the Proposed Development). Professional judgement was used to determine which views would be presented in wireline form and which would be rendered. Rendered and wireline images illustrate accurately the degree to which the Proposed Development would be visible, and its form in outline. The Detailed Proposals (Phase A) are shown as a blue outline in the 'wireline' images. The Outline Proposals are shown as a purple outline (Phase B), yellow outline (Phase C), and turquoise outline (Phase D) respectively. Rendered images also show the detailed form and the proposed use of materials for Phase A buildings. Wirelines are shown dotted where the new buildings would be occluded in the view image in question.

3.59 The Proposed Development is shown in one of two ways in the 'as proposed' images:

1. Wireline AVRs: All elements of the Proposed Development in the image shown in outline 'wireline' form, each phase distinguishable by the colours noted above. The wirelines for the Outline Proposals (Phases B, C and D) identify the maximum massing envelope, with all phases occluded against each other; and
2. Rendered AVRs: The Detailed Proposals (Phase A) shown in photorealistic 'rendered' form. The Outline Proposals (Phases B, C and D) are shown in wireline form, identifying the maximum massing envelope, with all phases occluded against each other.

3.60 For each of the identified verified views, a description and assessment have been given:

- A description of the view as existing, identifying the type of viewer likely to experience the view, the visual quality of the view, its sensitivity to change and, where necessary, the reason for that sensitivity;
- A description of the view as proposed, with an assessment, based on the method set out above of the significance of the effect that the Proposed Development would have on the view, and a qualitative assessment of the effect of the Proposed Development.

- An assessment of the view 'as proposed with cumulative schemes' i.e. of the cumulative effect of the Proposed Development in the context of other proposed and consented 'cumulative' schemes which are shown in the view as orange wirelines.

3.61 In addition, Appendix A7 of this TVIA contains images showing the cumulative condition for each view printed at the optimum scale for assessing the Proposed Development on site. When these pages are held at a comfortable viewing distance, a viewer standing at each viewpoint location would find that the features shown in the relevant AVR will appear at the same size as they do in the actual scene.

3.62 As noted above, a number of the buildings of the Proposed Development are not yet designed in detail. Parameter Plans submitted as part of the planning application set out the maximum footprints and maximum height of each plot (or part of a plot). The scenario presented in this assessment is that in which every outline plot would be built out to the maximum height and footprint possible for each plot, and this is referred to as the 'maximum parameters' scenario. This is considered to be the scenario in which the Proposed Development would have the maximum, i.e. most significant, effect.

3.63 In addition, the assessment of the effect of the Proposed Development at maximum parameters takes into account the Design Code document submitted with the planning application, where relevant. The Design Code sets out guidance to inform the detailed design of buildings and open spaces within the outline part of the Proposed Development at the Reserved Matters stage. The Parameter Plans and Design Code together will inform the future Reserved Matters applications.

3.64 A number of proposals for developments near the Site have either been granted planning permission, are under construction, or have been submitted for planning permission to the relevant local planning authority. These 'Cumulative Schemes' are noted in Appendix A2 'Details of schemes' of this TVIA, and an assessment of the effect of the Proposed Development in the context of these Cumulative Schemes, is provided later in this TVIA.

3.65 The approach to cumulative assessment is to focus on the additional effects of the Proposed Development on top of the cumulative baseline (i.e. as if the cumulative schemes were in place). The GLVIA acknowledge this as one of two main assessment approaches which are acceptable. It is considered that this approach is best suited to an urban environment, in which the cumulative effects between the Proposed Development and other schemes can be complex (including situations in which the effect of the Proposed Development could be lessened or removed entirely by cumulative schemes) and because, as also acknowledged in the GLVIA, it may not be considered reasonable to assess the effect of many

complex schemes other than the Proposed Development in the manner required by the alternative approach, known as the 'combined effects' approach.

3.66 The assessment of individual views, and the concluding section concerning effects on townscape, which is informed by the view assessments, has considered the effect on the townscape and views as they would be experienced by viewers in reality. Photographic images of townscape are no more than an approximation to this, for a number of reasons:

- Viewers have peripheral vision; their view is not restricted by borders as a photograph is, and they can move their eyes and heads to take in a wide field of view when standing in one place;
- Viewpoints themselves are not generally fixed. Townscape is experienced for the most part as a progression of views or vistas by people who are moving through streets or spaces rather than standing still;
- Photographs do not reflect the perception of depth of field as experienced by the human viewer due to parallax;
- Before and after views illustrate the view in conditions that are particular in respect of time of day and time of year, daylight and sunlight, and weather, and the view will appear differently to varying degrees when any or all of these things vary; and
- Townscape is experienced not by the eye alone but by the interpretation by the mind of what the eye sees, considered in the light of experience, knowledge and memory.

3.67 The 'as proposed' images are provided as a guide to the effect on views as they would be experienced on site; to act as an aide-memoire; and to assist site visits. The assessment provided in this TVIA represents a professional judgement of the likely effect of the Proposed Development on the view or the townscape, informed by site visits as well as the photographic images provided, rather than an assessment of the photographic images.

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

#### Evolution of the Baseline

3.69 The 2017 EIA Regulations (as amended) require consideration of the evolution of the baseline should the Proposed Development not come forward. This consideration is provided in the section 'Assessment of the Future Environment' later in this report, and it is formed of a qualitative assessment made on the basis of professional judgement.

#### Assumptions and Limitations

3.70 The baseline photography was carried out when the trees were not in leaf (with the exception of the view from Memorial Recreation Ground – View 34). The assessment of the effect of the Proposed Development is therefore considered to be of its maximum visual impact in all cases where winter photography was used. In the case of View 34, digital modelling was used to inform a separate assessment of the effect on that view in the winter condition (i.e. taking into account the maximum visibility of the Proposed Development). Where changes to the visibility of the Proposed Development in a particular view shown in the winter condition would be significant enough to alter the assessment of the magnitude of change resulting from the Proposed Development, a separate assessment for summer is provided in the accompanying text.

3.71 In many cases, in particular those where new buildings within the outline phases would be seen at close quarters, the visual impact of the Proposed Development would be dependent on the quality of the architecture, detailing and materials, which are matters not fixed at this stage, but are governed by the Design Code. The assessment is based on the premise that buildings defined by the Parameter Plans would be of a high standard of architecture, detail and materials as required by the Design Code and national, London-wide and local design policies and guidance.

3.72 The AVRs and view assessments accompanying them inform the assessment of effect on townscape character areas which is provided within the Townscape Assessment section. As with the assessment of views, the assessment of the effect of the Proposed Development on townscape character areas is made with regard to the Design Code, where relevant. Urban design effects are also relevant to consideration of the effect on townscape character areas.

3.73 The baseline photography was taken during daylight hours. It is considered that the appearance of the Proposed Development at night would be consistent with that of other existing developments in the local area, and separate night time AVRs are not provided.

#### Consultation

##### *Engagement with the LBTH*

3.74 A series of pre-application meetings and workshops took place between the Applicant and planning and urban design officers at the LBTH over the course of late 2020 and 2021. Effects on townscape, views and heritage were discussed at meetings on 4 September 2020 and 7 October 2020. A site walkabout with officers took place on 12 October 2020, which resulted in the refinement of the proposed viewpoints in line with officer comments. A further townscape and views-focussed meeting took place with officers on 13 November 20.



- 3.75 An EIA Scoping Request was issued to the LBTH in August 2021. This set out the proposed methodology for the TVIA and the proposed list of 33 viewpoints to be assessed.
- 3.76 An EIA Scoping Opinion was issued by the LBTH on 8 September 2021. A number of issues were raised. The response to these is provided within **ES Volume 3, Appendix EIA Methodology: Annex 3**. PSC's response to the matters raised in relation to the TVIA scope is also provided in Table 2-2 below:

Scoping Opinion comment	PSC response
<b>4.7.2 General Comments</b>	
The ES should clearly identify the receptors considered within the TVIA and their sensitivity to the demolition and construction, and operation of the Proposed Development. This should be supported by a clear map outlining the receptors and study area, such as the figure provided in Appendix G of the Scoping Report	Townscape and visual receptors will be clearly identified in the TVIA, with reference to Figures showing their location. Sensitivity ratings will be applied to each receptor.
All judgements on the significance and direction of effects on views and townscape need to be fully explained and justified.	Judgements will be supported by explanatory text describing the effect of the Proposed Development on a given view or townscape receptor.
The assessment of townscape character should have regard to the location and sensitivity of affected townscape character areas (with reference to the Tower Hamlets Local Plan 2031: Managing Growth and Sharing the Benefits (2020), Urban Structure and Characterisation Study and other relevant guidance, such as Conservation Area appraisals, design guides, supplementary planning documents and the Tower Hamlets Conservation Strategy), in addition to such documents adopted by the London Borough of Newham.	Due regard will be given to these publications in the submitted assessment.
A list and map of proposed views has been provided within the Scoping Report in Appendix G. This will need to be discussed and agreed with LBTH's Urban Designer through a site visit, a VU City Model and / or an initial assessment. It is helpful if photos with wirelines of the Proposed Development are provided in the first instance to inform the identification of rendered views.  From an initial consideration LBTH consider the following viewpoints should also be assessed in the townscape and visual aspect chapter:  <ul style="list-style-type: none"> <li>Viewpoints to demonstrate how the setting of Grade II* listed Balfron Tower and associated Conservation Area is affected by the Proposed Development, to include a view from Brownfield Street;</li> <li>Viewpoint from Royal Oak Public House (Grade II) on Barking Road;</li> <li>Viewpoint from Memorial Recreation Ground.</li> <li>Locally (Royal Borough of Greenwich) designated views (as identified in policy DH(g) of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies): <ul style="list-style-type: none"> <li>– View 7: Thames side panorama from the Thames Barrier open space.</li> <li>– View 9: Docklands Panorama from the Wolfe Monument; and</li> <li>– View 11: 02 from Central Park.</li> </ul> </li> </ul>	The Applicant has engaged directly with planning and urban design officers at the LBTH on the proposed viewpoint locations and view type since October 2020. The views identified in the scoping submission reflect these discussions, including those that took place on a site visit with the LBTH's urban designer on 12 October 2020. With respect to the specific viewpoints noted opposite:  The viewpoints identified in the map included in the scoping submission are considered by KMHeritage (KMH) to be sufficient to inform a full assessment of the effect on the setting of Balfron Tower and the associated Conservation Area. The set includes a view from Brownfield Street, added following a pre-application meeting with Historic England (HE) in February 2021.  KMH have considered this request and advise that it is clear from inspection of a Zone of Visual Influence study (ZVI) commissioned for this application that there will be no intervisibility between this receptor and any part of the Proposed Development (please see the enclosed ZVI study for reference). Therefore, it is not considered necessary to provide a view from this location.  The TVIA will include a view from Memorial Recreation Ground, as requested.  View 7: The ZVI study reveals that the Proposed Development would be screened from view by intervening buildings. Therefore, we do not propose to provide a view from this location.  View 9: The proposed views set identified in the scoping submission already includes this viewpoint (LVMF 5A.1).  View 11: A ZVI study reveals that the Proposed Development would not be visible from Central Park (please see the ZVI study enclosed). Therefore, we do not propose to provide a view from this location.
The Applicant is advised to consult with the Twentieth Century Society and Historic England regarding the viewpoints proposed to ensure the effects on Balfron Tower and Carradale House listed buildings can be sufficiently understood. The Applicant is advised to refer to the Twentieth Century Society's and Historic England's consultation response in this regard.	The Applicant presented the emerging proposals for the Site to HE in February 2021. The viewpoint set reflects the request from HE to include an additional view from Brownfield Street.  The viewpoints identified in the map included in the scoping submission are considered by KMH to be sufficient to inform a full assessment of the effect on the setting of Balfron Tower, Carradale House and the associated Conservation Area.  At the time of writing (October 2021) there had been no direct engagement between the Applicant and the Twentieth Century Society in relation to the Aberfeldy New Masterplan.  KMH advise that there would only be a requirement to consult this body if the works involved demolition of some part of the listed buildings on the Brownfield Estate.

Scoping Opinion comment	PSC response
The Applicant should consider whether the Proposed Development would be visible in LVMF views and Borough designated views (as identified in Figure 6 of policy D.DH4 of the Tower Hamlets Local Plan 2031: Managing Growth and Sharing the Benefits (2020).	LVMF views: PSC considered these and determined that the TVIA should present a view from Greenwich Park (LVMF 5A.1). This viewpoint was included in the set proposed in the scoping submission.  Borough Views: PSC considered these and determined that the TVIA should present Borough Designated View 5 (Balfron Tower from Langdon Park) and Borough Designated View 6 (Balfron Tower from East India Dock Road). These viewpoints were included in the set proposed in the scoping submission.
It is important that the assessment is designed to ensure that all impacts are fully understood. Section drawings and techniques such as photomontages are a useful part of this.	This is noted.
The TVIA methodology should accord with the GLVIA3 methodology as described within the Scoping Report. It is therefore understood that the TVIA will highlight the 'residual' likely significant effects for townscape and views (those effects which remain following the implementation of suitable mitigation/iterative design measures). The TVIA should clearly establish which levels of effect are deemed significant, with clear justification as to the nature (adverse, beneficial or neutral) of effect.	The TVIA will accord with the GLVIA3 methodology  The TVIA will identify which levels of effect are deemed significant, and provide justification as to the nature of effect.
Images should be prepared in accordance with the Landscape Institute's Technical Advice Note 06/19 'Visual Representation of Development Proposal'. Visualisations are required to be undertaken in accordance with Type 4, as described on Page 11, and Pages 21-24. The presentation of AVRs should reference the latest Landscape Institute Guidance on visualisations (TGN 06/19) and should include a detailed description of the AVR production methodology.	Images will be prepared in accordance with Advice Note 06/19.
The ES should contain a detailed methodology, which demonstrates that the views can be relied on as a fair representation of the impacts of the Proposed Development. The assessment should not focus on only any beneficial effects of the Proposed Development.	This will be confirmed in the TVIA methodology.  Where effects are considered to be beneficial, they will be identified as such.
It should be noted that whilst townscape, views and built heritage are interrelated, each matter should be clearly defined and dealt with appropriately in order to comply with the current guidelines e.g. its own methodology, and effects identified. Some guidance on links to cultural heritage assessments is provided at paragraphs 5.7-5.11 of Guidelines for Landscape and Visual Impact Assessment Third Edition (GLVIA 3). The townscape and visual assessments in the TVIHA should be informed by the built heritage assessment, especially in relation to sensitivity and value of heritage assets and provide clear cross-reference as appropriate.	Separate methodologies will be applied to the TVIA will Built Heritage Assessment (BHA).  Notwithstanding, the TVIA will take into account the sensitivity and value of heritage assets lying within its study area. Cross-references to the BHA will be made as appropriate.
All cumulative schemes identified for assessment should be clearly identified on a plan showing their location relative to the Proposed Development and for each viewpoint by an AVR illustration where they would be in view, to show how the cumulative effects assessment has been determined.	This is noted. Cumulative schemes will be identified in views 'as proposed with cumulatives' to inform an assessment of cumulative effects on views and townscape in the TVIA.
<b>4.7.3 Demolition and Construction</b>	
The ES should confirm details of any construction compounds and Application Site hoarding and provide assessment within the TVIA as required. The TVIA should also consider the programme of work, including any phasing of construction.	This is noted. Details of such mitigation measures will be provided in the TVIA.
<b>4.7.4 Operation</b>	
The ES should assess winter views so that vegetation is not screening the Proposed Development. In views where there is no vegetation, summer visualisations may be used.	The ES will assess views using winter photography, except in the case of the view 34 - Memorial Recreation Ground). In this instance while summer photography is used (as it was provided in response to the Scoping Opinion) the wireline representation of the Proposed Development indicates the potentially visible parts as a solid line in the image where trees appear. This is an accurate representation and the TVIA assesses the 'worst case/maximum visibility' condition.

Table 2-2 Response to EIA Scoping Opinion comments on TVIA

*Other consultees*

- 3.77 The Applicant presented the emerging proposals for the Aberfeldy Village Masterplan to Historic England on 15 February 2021. Feedback included a request for an additional verified view looking towards the Site from Brownfield Street, taking in Balfron Tower. Historic England's response to the Scoping submission confirmed their request for this additional view. The view is included in this TVIA.
- 3.78 The emerging proposals for the Site were presented to the GLA on 17 November 2020. The scheme's effect on the setting of Balfron Tower was discussed at the meeting.



## 4 Baseline Conditions

4.1 The Site is located in Poplar, in the LBTH. The irregularly shaped site is 8.14 hectares (approx. 20 acres) in size. The Site is located to the east of the Blackwall Tunnel Northern Approach Road (A12), to the south/south-west of Abbot Road, the former Leven Yard Gasworks site, and the River Lea beyond that, and to the north of the Aberfeldy Village development and Culloden Primary School. East India Dock Road (A13) lies just to the south of that.

4.2 The Site takes in Abbott Road, Aberfeldy Street, Balmore Close, Blairgowrie House, Heather House, Jura House, Tartan House, Thistle House, Kilbrennan House, Blairgowrie House, Nos. 33-35 Findhorn Street, Nairn Street Estate, Leven Road open space and Braithwaite Park, as well as a stretch of land running parallel to the A12, and the adjacent vehicular and pedestrian underpasses.

4.3 The surrounding area is severed by transport corridors - both the A12 and A13, and also the River Lea, which is a barrier to east-west movement. The townscape is fragmented and as a whole undergoing wide scale regeneration. There are areas of industrial land, large areas of post-war housing estates, and areas of recently developed land, as well as pockets of historic or earlier development. The grade II\* listed Balfon Tower, lying just to the west of the A12 and the Site, is the focus of both the Brownfield Estate and the Balfon Conservation Area, which include other listed buildings, such as Carradale House (grade II), and Glenkerry House (grade II).

4.4 The recent and emerging context in the surrounding area comprises predominantly residential led schemes, many of which include at least one tall building.

4.5 The Site and its surroundings are described in further detail in the following chapter.

### Historical development of the area

4.6 Bromley originally developed around the Benedictine nunnery of St Leonard, which was in existence by 1122. The area of Bromley by Bow expanded as a settlement along the western side of the River Lea, close to fords across the river which had been improved during the Roman occupation.

4.7 By the 17th century, the area was a rural retreat, with mansions in spacious grounds occupying the area – this continued into the 18th century, and it wasn't until the early 19th century that suburbanisation began towards the north of the Site. The area of the Aberfeldy Estate was originally developed in 1864 as small terraced houses by David McIntosh, and later from 1873 by John Abbott. Suburbanisation continued, and the wider area was covered by terraced housing by the end of the 19th century.

4.8 Close to the Site, the Poplar Gasworks was built by the Commercial Gas Company from 1876 onwards. No.1 Gasholder was built by 1877 - the first gasholder on the site

by engineer Harry Jones (it was considerably smaller than the adjacent and later gasholder of 1929). By the end of the 19th century, a number of works, wharves and mills had been built along both sides of this stretch of the river. Other local uses included a bus depot on Leven Road, operated by London County Council (LCC).

4.9 The Abbott Estate was built as low-rise housing from 1947, although has been largely rebuilt since. The steel-framed Braithwaite House on Abbott Road (now demolished) was finished in 1950, and Aberfeldy Street was rebuilt in 1948 to become the main shopping street in the area.

4.10 The Aberfeldy Estate and Nairn Street Estate were built during the 1970s. They reflected the typical design principles of that time. The new street pattern and building layouts departed from the historic grain of the former Victorian terraces, instead creating a less permeable area with long linear block of flats and maisonettes. A number of schools were built around the Site at this time, both in close proximity to the A12: Culloden Primary School, on Dee Street to the south; and Bromley Hall School (grade II) on Leven Road to the north.

4.11 The Blackwall Tunnel Northern Approach Road was constructed in the 1960s, bringing about considerable change in the area, creating a physical barrier between the areas immediately west of the river and those further west. The Brownfield Estate (west of the Site) which includes Balfon Tower, Carradale House and Glenkerry House, replaced terraced housing during the second half of the 1960s.

4.12 In recent years, there have been a number of new developments in the area surrounding the Site. Completed riverside apartment blocks on Leven Road include Leven Wharf. Around 2010, the gas holders were cleared from the Poplar gasworks site to make way for the Poplar Riverside development, which will include a number of tall residential towers. Just south of the Site, Phases 1, 2 and 3a of Aberfeldy Village have been completed and are occupied. Phase 3b is currently on site and due for completion next year.

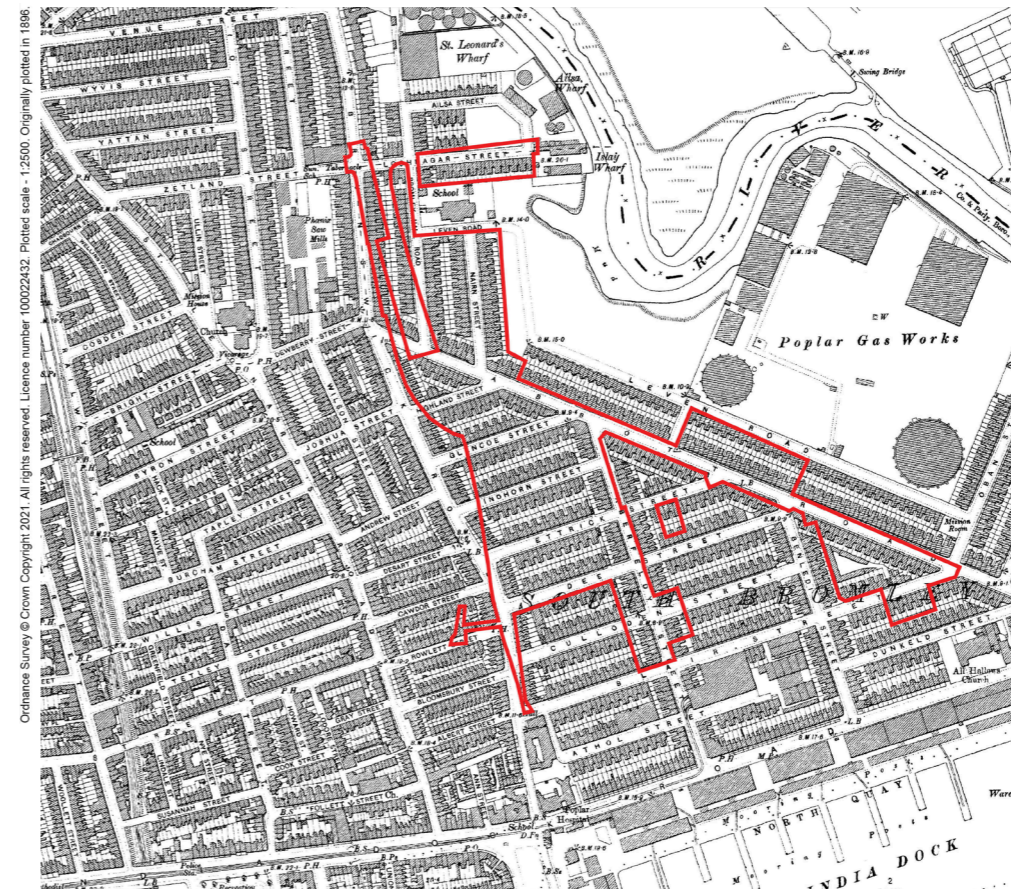


Figure 2-1: OS map from 1896

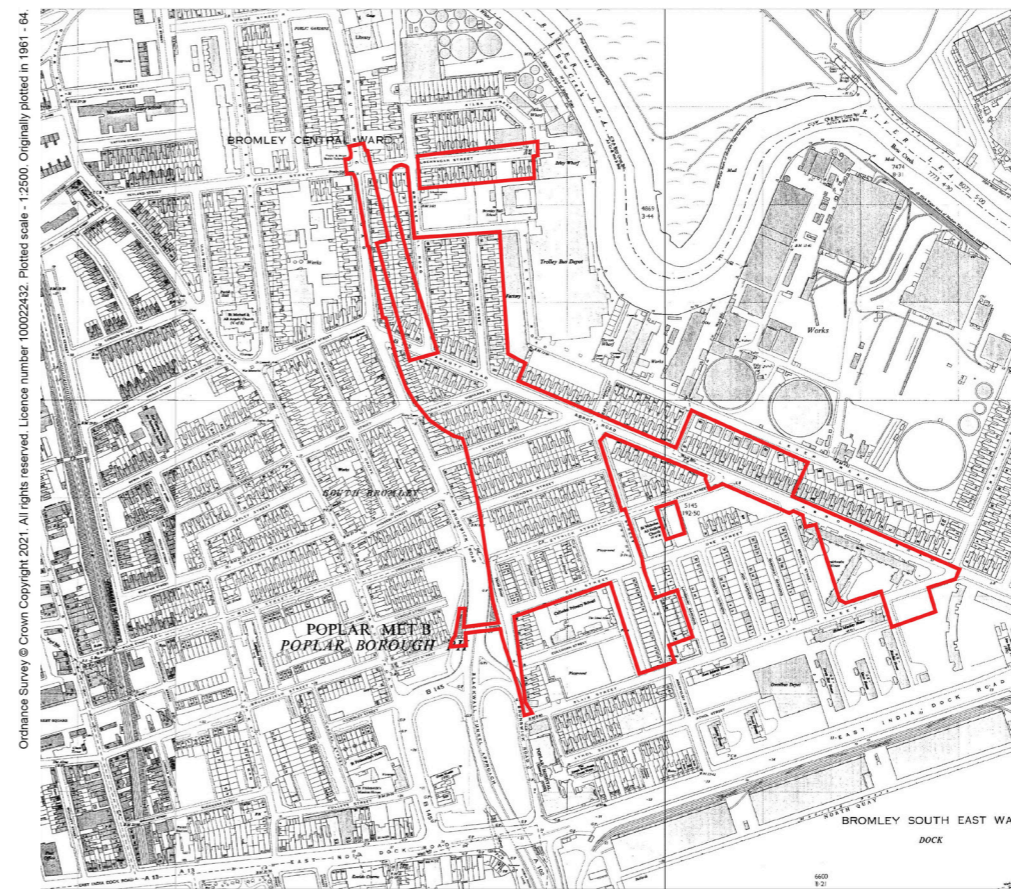


Figure 2-2: OS map from 1961-4



## 5 Receptors and Receptor Sensitivity

5.1 This section identifies the townscape and visual receptors considered in this assessment. Townscape is characterised by dividing the study area into geographical areas which have readily identifiable characteristics in common (townscape character areas). Each townscape character area (TCA) is considered as a receptor in its own right. Visual receptors take the form of views from selected viewpoints. These viewpoints are presented in tabulated form. Once identified, the sensitivity to change of each receptor is then stated.

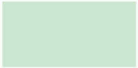




### HERITAGE ASSETS

5.2 The heritage assets that have informed the assessment of the sensitivity of TCAs are set out under each TCA below. These include all designated heritage assets within the TCAs. An assessment of the effects of the Proposed Development in respect of heritage assets around the Site, taking into account heritage significance, is contained in ES Volume 2, Part 2: Built Heritage Assessment.

### Notes:

Approximate site boundary is marked in red for indicative purposes only.

### Townscape character areas:

-  Townscape character area 1: Poplar
-  Townscape character area 2: Poplar Riverside
-  Townscape character area 3: East India Dock
-  Townscape character area 4: East of The River Lea
-  Townscape character area 5: Limehouse Cut

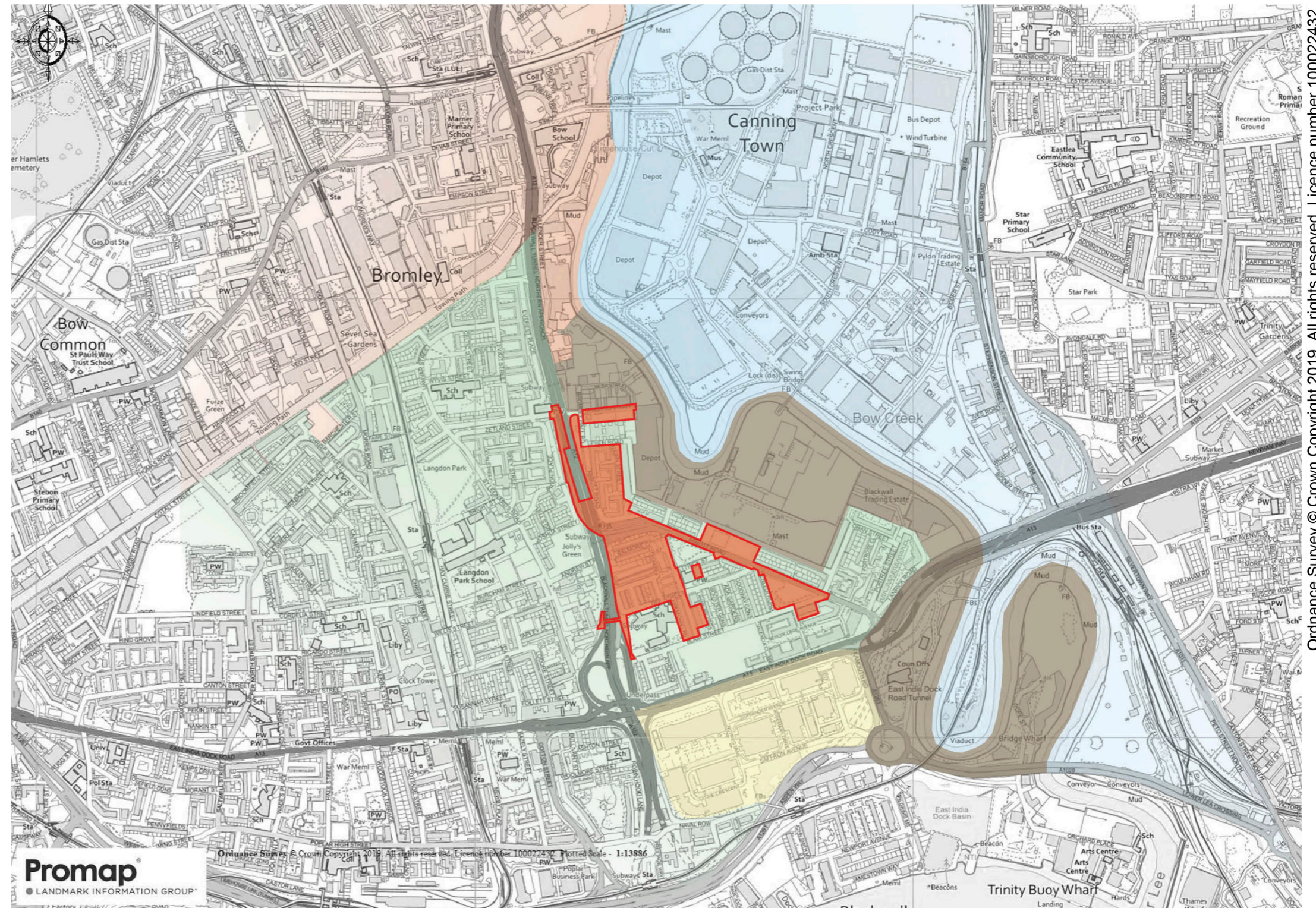


Figure 2-3: Townscape Character Areas