3.0 Assessment method and significance criteria

- 3.1 The section explains the method that has been used to carry out the townscape and visual impact assessment. It is based on the principles set out in the third (2013) edition of *Guidelines for Landscape and Visual Impact Assessment* (GLVIA) (Ref. 11), produced by the Landscape Institute with the Institute of Environmental Management and Assessment.
- 3.2 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.
 - The impacts 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 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.

Townscape character areas - assessment method

- 3.3 An assessment has been made of the Site and its surroundings in their existing state. This analyses the physical characteristics and the character of the townscape and considers the current status of the Site.
- 3.4 This was carried out following a study of the historic development of the area which was made with reference to the following publications:
 - The Buildings of England, London 2: South, Bridget Cherry and Nikolaus Pevsner, Yale UP, 2002 (Ref. 12).
 - The London Encyclopaedia, Ben Weinreb, Christopher Hibbert, Julia Keay, John Keay, Macmillan, 2010 (Ref. 13).
- 3.5 The present-day condition of the area was studied by site visits, 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), and the Pevsner volume referred to above. Site visits allow the accuracy of record data to be verified. Record photographs were taken on site visits.
- 3.6 Townscape is characterised by dividing the study area into geographical areas which have readily identifiable characteristics in common. 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 an urban area into townscape character areas ('TCAs') is carried out by a combination of professional judgement and common sense based on site investigation on the ground, and the study of documents, as described above.

3.7 A study has been undertaken to identify any above-ground designated heritage assets within 1km of the centre of the Site, using information derived from the National Heritage List for England website and the Local Planning Authority website. The identified heritage assets have informed the identification and assessment of TCAs and views where relevant, and the effect of the Proposed Development on the townscape and visual setting of these heritage assets has been considered. Designated heritage assets comprise World Heritage Sites, Conservation Areas, Listed Buildings, and Registered Parks and Gardens of Special Historic Interest. Locally listed buildings have also been identified.

Views and visual impact – method of assessment

- 3.8 A study was undertaken to establish a set of potential viewpoint locations from which 'before and after' views are provided. The study area is centred on the Site and is 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 views extends to approximately 350m from the centre of the Site, the approximate distance to the viewpoint from Lyle Park. The study area for medium and long range views extends to approximately 1.4km, the approximate distance to the Thames Barrier viewpoint. Informed by consideration of the visual effects of existing buildings of a comparable height within comparable regeneration areas, such as the Royal Docks and Greenwich Peninsula, seen at comparable distances, it is considered that at a distance greater than this development of the scale envisaged would not be a significant visual presence.
- 3.9 Within this study area, four types of viewing location are identified:
 - Views that have been identified as significant, by the planning authority or others,
 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 World Heritage Sites, Listed Buildings and Conservation Areas;
 - Representative townscape locations from which the Proposed Development will be visible; and
 - Locations where there is extensive open space between the viewer and the Proposed Development so that it will 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.
- 3.10 The set of viewpoints is chosen so that it covers:
 - The range of points of the compass from which the Proposed Development will be visible:
 - A range of distances from the site; and
 - Different types of townscape area.
- 3.11 Possible locations in these categories within the study area are identified based on an examination of maps and aerial photographs; the documents referred to above; maps of Conservation Areas; and maps and lists of listed buildings. The study area and the possible locations are then visited to establish candidate viewpoints, if required. The viewpoint locations have been agreed with the Royal Borough of Greenwich (RBG).

Sensitivity of receptors

- 3.12 The sensitivity of the receptor (townscape character area, townscape setting of a heritage asset, or view) as existing is assessed as **high**, **medium** or **low**.
- 3.13 The sensitivity of a receptor is dependent on:
 - the importance of the receptor
 - · the value and quality of the receptor
 - the nature and expectation of the viewer.
- 3.14 The importance of the viewpoint is determined by any recognition that the viewpoint may have and by its amenity value. In terms of views, recognition includes viewpoints identified by the local authority in planning documents, and viewpoints visited by large numbers of people. In terms of townscape receptors, recognition includes heritage designation e.g. of a Conservation Area. Locations such as parks and riverside walkways which are used for leisure purposes are considered to be more sensitive in visual terms than everyday streetscapes with no heritage designation.
- 3.15 The value and quality of the receptor is a reflection of its visual interest, its character and coherence and any attractive or notable pictorial or compositional qualities. The value of a view or townscape character area is likely to be higher if it overlooks a designated area such as a conservation area.
- 3.16 The nature and expectation of the viewer reflects the occupation or activity of the people who will gain the view. The GLVIA uses the term 'receptor' to mean both elements of the physical landscape and townscape, and people who will see the development and its setting. In the case of townscape assessment, the latter 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 are likely to have a higher sensitivity than people at their place of work.
- 3.17 The assessment of sensitivity takes into account the following heritage assets and their settings, in decreasing order of importance (but this is only a general guide see comment below on moderation):
 - World Heritage Sites, Grade I Listed Buildings;
 - Grade II* or Grade II Listed Buildings, conservation areas and registered parks and gardens;
 - Locally listed buildings
- 3.18 The assessment of the sensitivity of the receptor under consideration may be moderated to take into account a judgement about its quality in the round. For example: a World Heritage Site or a listed building may have a good or a poor setting, and a good quality setting is more sensitive to change than a poor quality setting; 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; conservation areas include within them areas of greater and lesser quality; and so on. Thus there is not necessarily a direct mapping between the heritage categories listed above and the assessment of sensitivity as high, medium or low.

Effect of the Proposed Development on receptors – method of assessment and significance criteria

- 3.19 The assessment of the significance of the effects of any proposed development on existing receptors is a matter of judgement. The assessments in this document are made on the basis of professional judgement which takes into account relevant planning policies and guidance. The assessment is based on the following method.
- 3.20 An assessment is made of the likely **significance** of the impact that the Proposed Development will 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 resulting from the Proposed Development.
- 3.21 The **magnitude** of the change resulting from the Proposed Development is assessed as **major**, **moderate**, **minor** or **negligible** using the following criteria:
 - Major: considerable change to the receptor;
 - Moderate: an obvious change to the receptor that would be readily noticeable to most viewers;
 - Minor: a slight change to the receptor that would not be easily noticed;
 - Negligible: there would be minimal change to the receptor.
- 3.22 In cases where the Proposed Development does not appear and results in no change to the receptor, an assessment of 'no effect' is given.
- 3.23 These two measures sensitivity and magnitude are combined to provide a measure of the significance major, moderate, minor or negligible of the effect on receptors which will result from the Proposed Development, the most significant effects being effects of major magnitude on settings of high sensitivity. Likely significant effects, for the purposes of The Town and Country Planning (Environmental Impact Assessment) Regulations 2011, are those which fall in the shaded area of the table below. The terms in the boxes in the table indicate the significance which results from the relevant combination of magnitude of change and sensitivity.

		Sensitivity		
		High	Medium	Low
Magnitude of change	Major	Major	Moderate to major	Moderate
	Moderate	Moderate to major	Moderate	Minor to moderate
	Minor	Moderate	Minor to moderate	Minor
	Negligible	Minor/ negligible	Minor/ negligible	Negligible

Table 1 - Significance of impacts

3.24 However, it should be noted that 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 'moderate to major' 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 are considered and the most appropriate significance assessment, based on professional judgement, is chosen.
- 3.25 Effects are also assessed qualitatively as **beneficial**, **adverse** or **neutral** in respect of their impact on the receptor under consideration.
- 3.26 The degree to which effects are beneficial or adverse is not necessarily related directly to the degree of sensitivity or to the magnitude, or, consequently, to the significance, since with regard to a given view, area of townscape or heritage asset that is being assessed, there may be both positive and negative impacts as a result of the development. The question of whether an effect is beneficial or adverse relies on a judgement in the round and is a 'net equation'. An effect that is significant (because of the combination of magnitude and sensitivity) may be neutral in respect of the effect on the quality of the receptor under consideration.

Existing and proposed view images

- 3.27 For each of the identified views in the assessment which follows, there are images of the view 'as existing', showing baseline conditions, and 'as proposed' images, showing the Proposed Development in the image in outline 'wireline' form, or as a photorealistic 'rendered' image.
- 3.28 '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 method by which AVRs are produced is described in Appendix A.
- 3.29 AVRs are provided either as rendered (photorealistic) images ('AVR3') or as 'wirelines' (diagrammatic representations showing the outline of the Development, 'AVR1'). Rendered and wireline images illustrate accurately the degree to which the proposed development will be visible, and its form in outline. Rendered images also show the detailed form and the proposed use of materials.
- 3.30 For each of the identified verified views, a description and assessment are given:
 - A description of the view as existing, identifying its visual quality, 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 impact that the Proposed Development will have on the view, and a qualitative assessment.
 - An assessment of the view 'with cumulative schemes' i.e. of the effect of the Proposed Development in the context of other proposed and consented schemes which are each shown in the view as a red wireline.
- 3.31 The baseline photography for the views was carried out in July 2016 when the trees were in leaf. Some of the views illustrated would appear different in winter, and this is likely to result in the visibility of the Proposed Development being increased to some extent in some cases. Where the changes to the visibility of the Proposed Development in a particular view would be significant enough to alter the assessment of the magnitude of change resulting from the Proposed Development, a separate qualitative assessment for summer and winter is provided.

- 3.32 A number of proposals for proposed or consented developments in the wider area around the Site have been identified for 'cumulative' assessment, in consultation with RBG. These cumulative schemes are set out in Section 5 and an assessment of the effect of the Proposed Development in the context of these schemes has been provided in Section 9. The approach to cumulative assessment is to focus on the additional effects of the Proposed Development on top of the cumulative baseline. Where the other cumulative developments would be visible to a significant extent in the identified view, a further image showing the Proposed Development and these cumulative schemes is also given. These proposed schemes are shown as a red wireline.
- 3.33 The assessment of individual views, and the concluding section concerning effect on townscape, which is informed by the view assessments, consider the effect on the townscape and views as they will 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.
 - 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.

The assessment represents a professional judgement of the effect of the 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.

3.34 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.

Scoping consultation

3.35 An Informal EIA Scoping Report including a proposed set of viewpoints was issued to RBG in May 2016. A response from RBG was received in June 2016; this requested the movement of some viewpoints to different locations, and the set of viewpoints was subsequently altered to reflect these requests. The viewpoints presented in this ES Volume have therefore been agreed with RBG.

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