

Southwark Integrated Waste Management Facility

Old Kent Road, Bermondsey, London

Veolia ES Southwark

Environmental Statement

**Chapter 9
Townscape & Visual Impact**

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9 Townscape & Visual Impact

9.1 Introduction

9.1.1 This chapter assesses the townscape and visual effects associated with the proposed development of an Integrated Waste Management Facility (IWMF) on land off Old Kent Road, Bermondsey, London, within the administrative area of Southwark Borough. The proposed development is described in Chapter 4 of the Environmental Statement, and a summary is presented in Section 9.5 below.

9.1.2 The townscape and visual assessment has been prepared to provide information on the townscape and visual characteristics of the proposed development of the IWMF, and to determine the degree of physical and visual effect that the development of the IWMF (which comprises a combined Mechanical Biological Treatment Building/Material Recovery Facility/Household Waste Re-use Recycling Centre, a Resources Centre, Vehicle Maintenance Workshop and Weighbridge, with associated access to the A2 Old Kent Road, car and lorry parking facilities together with hard and soft landscape treatments) would have upon the townscape of the study area and its surroundings. Principally it aims to:

- Identify visual receptors with views of the proposed re-development;
- Assess the significance of the effects on the townscape and views, taking account of measures proposed to mitigate any effects identified; and
- Describe resulting residual townscape and visual effects associated with the development.

9.1.3 The assessment methodology is set out in Appendix 9.1.

9.1.4 A townscape and visual assessment is an analysis of the physical and perceptual attributes of an area. The townscape assessment of the site relates to the effect of development on the townscape and landscape resource, whereas the visual assessment is concerned with the effect on visual amenity.

9.1.5 The site is located on the north side of the A2 Old Kent Road, about 2.0km south and west of the River Thames, and approximately 250m to the west of the South Bermondsey to Peckham Branch Line. The surrounding area is predominantly in mixed urban uses, although as highlighted by Figure 9.1 the immediate locality is characterized by a predominance of industrial/employment uses, together with commercial, recreation/amenity, education/community and residential uses, particularly to the southeast.

9.1.6 The site was formerly associated with the adjacent operational gas works, but is now in mixed employment and storage uses. The site and surrounding study area are further defined in Section 9.3, Baseline Conditions.

9.1.7 Two separate study areas are considered within the assessment. Firstly, the townscape assessment considers a local study area comprising the townscape character area within which the proposal falls and identified character areas that lie immediately adjacent to this; the townscape assessment is generally focused on land that lies within 200m of the site boundary. Secondly, the proposed development has the potential to affect views from vantage points beyond the area considered by the townscape assessment, including views identified as being of London-wide importance. Therefore a wider study area has been addressed by the visual assessment that extends up to 11.2km to the northwest to include Parliament Hill.

9.2 Legislation and Planning Context

9.2.1 A detailed review of the development plan documents and planning context in relation to the development proposals is provided in Chapter 3.

9.2.2 This section summarises those policies that are directly relevant to townscape and visual issues.

National Policy & Legislation

Planning Policy Statement 1 (PPS1) - Delivering Sustainable Development (Feb 2005)

9.2.3 With respect to the consideration of design by all those in the development process, paragraph 35 states:

"High quality and inclusive design should be the aim of all those involved in the development process. It means ensuring a place will function well and add to the overall character and quality of the area, not just for the short term but over the lifetime of the development. This requires carefully planned, high quality buildings and spaces that support the efficient use of resources."

9.2.4 And at paragraph 38 states:

"Design policies should avoid unnecessary prescription or detail and should concentrate on guiding the overall scale, density, massing, height, landscape, layout and access of new development in relation to neighbouring buildings and the local area more generally."

Regional Policy

The London Plan (Feb 2008)

9.2.5 Regional Policy is set out in the consolidated London Plan. In terms of townscape and visual matters, Policy 4B.10 – **Large-scale Buildings – Design and Impact** states:

"All large-scale buildings including tall buildings should be of the highest quality design and in particular:

- Meet the requirement of the View Management Framework set out in Policy 4B.16 of this plan*
- Be suited to their wider context in terms of proportion and composition and in terms of their relationship to other buildings, streets, public and private open spaces, the waterways or other townscape elements*
- Be attractive city elements as viewed from all angles and where appropriate contribute to an interesting skyline, consolidating clusters within that skyline or providing key foci within views...*
- Provide high quality spaces, capitalize on opportunities to integrate green spaces and planting and support vibrant communities around and within the building..."*

9.2.6 Policy 4B.16 – **London View Management Framework** designates a selected set of strategically important views, as listed in Table 4B.1 of the Plan, which are to be managed in accordance with Plan Policies 4B.17 and 4B.18. The suitability for designation of views is considered in relation to criteria stated within Policy 4B.16.

9.2.7 Policy 4B.16 also states that:

"Boroughs should base the designation and management of local views in their DPDs on Policies 4B.16 – 4B.18."

9.2.8 Table 4B.1 Lists the views designated as part of the London View Management Framework (LVMF) that are categorized into London Panoramas, Linear Views, River Prospects and Townscape Views. Policy 4B.17 states the Mayor's commitment to the preparation and ongoing review of management plans for the designated views; this commitment has subsequently been fulfilled through the preparation of the London View Management Framework Supplementary Planning Guidance (SPG), 2007.

London View Management Framework (LVMF) (July 2007)

9.2.9 The LVMF SPG sets out detailed descriptions and the parameters that enable the viewing points, and viewing corridors toward the Strategically Important Landmarks to be accurately identified, and sets out the approach to Qualitative Visual Assessment (QVA) of the potential impacts that new development may have upon such designated views.

9.2.10 Chapter 4 'Management of Protected Vistas by Geometric Definition' of the SPG. Paragraph 4.1 states:

"This chapter explains the management approach known as Geometric Definition that applies to 11 Protected Vistas in nine of the designated views. In addition to the Qualitative Visual Assessment to be applied to all designated views, the London Plan Policy 4A.15 (sic. Policy 4B.16) specifies that clear

visibility of specific Strategically Important Landmarks is critical to the appreciation of certain views. In these eleven Protected Vistas geometric constraints apply to ensure that new development does not occur that fails to preserve or enhance the ability to recognise and appreciate the landmark in those protected Vistas.”

9.2.11 Paragraph 4.4 continues:

“Within each Protected Vista is a Landmark Viewing Corridor (LVC) and a Landmark Background Assessment Area (LBAA), and where appropriate, a Landmark Lateral Assessment Area (LLAA)...”

9.2.12 The LBAA is explained further at paragraph 4.22:

“Each protected Vista includes a Landmark Background Assessment Area (LBAA) whose purpose is to ensure that new development in the background of the designated view does not detract from the ability to recognise and appreciate the Strategically Important Landmark. Each LBAA is defined as the projection into the background of the Landmark Viewing Corridor. Where appropriate this also includes the width of the LLAAs. The depth of the LBAA beyond the landmark ranges from 2.5km to 3.5km. This remains unchanged from previous government guidance.”

Local Policy

9.2.13 The proposed development site falls within the administrative areas of the London Borough of Southwark. The relevant Local Plan policies for the area have therefore been reviewed.

The Southwark Plan (Adopted July 2007)

9.2.14 Policy 3.2 – **Protection of Amenity** states:

“Planning permission for development will not be granted where it would cause loss of amenity including disturbance from noise, to present and future occupiers in the surrounding area or on the application site.”

9.2.15 Policy 3.12 – **Quality in Design** at paragraph 266 states:

“Development should achieve a high quality of both architectural and urban design, enhancing the quality of the built environment in order to create attractive, high amenity environments people will choose to live in, work in and visit. New buildings and alterations to existing buildings should embody a creative and high quality appropriate design solution, specific to their site’s shape, size, location and development opportunities and where applicable, preserving or enhancing the historic environment...”

9.2.16 Policy 3.13 – **Urban Design** states:

“Principles of good urban design must be taken into account in all developments. Urban design is the relationship between different buildings and streets, squares, parks and waterways and other spaces that make up the public domain; the nature and quality of the public domain itself; the relationship of one part of an urban area to another; and the pattern of movement and activity.”

9.2.17 Paragraph 272 elaborates further with regard to particular urban design aspects that will be sought in planning applications:

“In designing new developments, consideration must be given to:

- i) Height, scale and massing of buildings...
- ii) Urban structure, space and movement...
- iii) Townscape, local context and character...
- iv) Site layout...
- v) Streetscape...
- vi) Landscaping...
- vii) Inclusive design...”

9.2.18 Landscape design is discussed further at Paragraph 277:

“Landscaping contributes to the character and appearance of all developments. It should form an integral part of the development and be appropriately designed and located having regard for long-term sustainability, microclimate impacts and local biodiversity...”

- 9.2.19 The Council’s commitment to the protection of Strategic Views of St Paul’s Cathedral is set out in Policy 3.21. Paragraph 321 discusses the protection of views to this landmark specifically from Greenwich Park and Blackheath Point.
- 9.2.20 Policy 3.22 – **Important Local Views** states:
“The LPA will seek to protect and enhance identified views, panoramas, prospects and their settings that contribute to the image and built environment of the borough and wider London. Developments that would impact negatively on important local views will not be granted.”
- 9.2.21 Paragraphs 326 and 327 note that Important Local Views will be based on London Plan policies 4B.15 to 4B.17 and that they will be identified in the development plan documents.
- 9.2.22 The London Borough of Southwark was consulted regarding designated views identified in the London View Management Framework (LVMF). The Council was in agreement that the site falls in line with the Viewing Corridor of designated View 2A from Parliament Hill toward St Paul’s Cathedral, but at 4.2km from Geometrically Defined Co-ordinate (b), it lies outside of the Landmark Background Assessment Area for Parliament Hill (where the LBAA is defined by co-ordinates b to x as 2.5km), and as such would not require formal consultation in line with the LVMF. Notwithstanding this, the Council did request that an accurate visual representation be prepared looking from View 2A Parliament Hill, towards the Site. The methodology adopted is set out at Appendix 9.2; the appraisal of the view is set out in Section 9.6 and the visualization is presented at Figure 9.6.
- 9.2.23 The Council was also consulted regarding the identification and designation of important local views in Southwark in accordance with Policies 4.15 to 4B.17 of the London Plan. No specific important local views were identified by the London Borough of Southwark. However, the Council did note that it requires consideration of visual amenity within the vicinity of the proposed development. Accordingly a number of key local representative viewpoints have been identified and agreed with the Council (see Figure 9.5 – Location of Local Views and Photomontages) and these form the basis of photomontages set out in Figures 9.7 to 9.12.

9.3 Assessment Methodology

Relevant Guidance

- 9.3.1 As a matter of best practice, this assessment has been undertaken based on the relevant guidance on landscape and visual assessment. This includes:
- Landscape Institute and Institute of Environmental Management and Assessment (2002) ‘Guidelines for Landscape and Visual Impact Assessment 2nd Edition.
 - The Countryside Agency and Scottish Natural Heritage (2002) ‘Landscape Character and Assessment – Guidance for England and Scotland’.
- 9.3.2 The methodologies used for the landscape and visual assessments are set out at Appendix 9.1.

Consultations

- 9.3.3 As detailed in Chapter 1, a formal scoping exercise has been undertaken to inform the scope of the Environmental Assessment. This comprised submission of a Scoping Report to Southwark Council, setting out information regarding the proposal, likely effects that may arise and the proposed methodologies and standards to be adopted during the scheme assessment. Southwark Council issued its formal Scoping Opinion on 15th May 2008 (provided in Appendix 1.2). With regard to townscape and visual matters, it states:

“Design and Conservation: Generally satisfied with the report and it is expected that the Landscape and Visual Impact Assessment outlined in the report will be presented as an accurate visual assessment to ensure reliable information on the position and scale of the development. It is recognised that the

development appears to fall outside any important local views of London landmarks, but it will be important to assess the likely townscape and visual impact of the development from various local viewpoints, particularly from sensitive receptors such as the residential properties immediately adjoining the south-eastern corner of the site.”

Methodology

- 9.3.4 The Countryside Character Volume 7: South East and London published by the Countryside Agency in (1999) has been used to develop an appreciation of the wider townscape and landscape character and context of the Central London area.

Cumulative Impacts

- 9.3.5 Cumulative landscape and visual effects can result from further changes to the landscape or visual amenity arising from the proposed development in combination with other developments. In particular, the intervisibility of different developments may result in a combined significant effect upon a visual receptor located within the overlapping visual envelopes of several developments. Intervisibility is a consequence of topography, distance, aspect, weather, vegetation cover, and other natural and man-made visual barriers. Changes to the landscape features of an area arising from other developments may also affect the landscape context of the proposed development.
- 9.3.6 No proposed new developments have been identified that have the potential to impact cumulatively with the proposal.

9.4 Baseline Conditions

- 9.4.1 This section describes the existing townscape features, character and visual context of the site.

Development and Planning Context

- 9.4.2 The site lies within the urban expanse of Inner London to the south of the River Thames within the London Borough of Southwark, approximately 5km to the southeast of the City of London (about 4.2km from the southern façade of St Paul's Cathedral), and about 3.4km to the west of Greenwich Park. Access to the site is located off the A2 Old Kent Road, some 70m to the south. The South Bermondsey to Peckham Branch Line railway is 250m to the east (see Figure 1.1 Site Location Plan), which forms the Borough boundary between Southwark and Lewisham.
- 9.4.3 The site is not subject to any international, national, regional or local landscape designations, and there are no Listed buildings, Conservation Areas, Registered Parks and Gardens or designated nature conservation sites within or adjacent to the site boundary. The site also lies outside the Landmark Viewing Corridors and Landmark Background Assessment Areas for strategically Important Views as identified in the London Plan and the London View Management Framework Supplementary Planning Guidance.

Land Use

- 9.4.4 The site occupies part of a former gasworks site, with extant operational gasworks uses lying immediately to the west, separated by the gas works access road. Current uses within the site include car parking and open storage, and miscellaneous industrial and storage/warehousing. Hard surfacing including concrete, tarmac and compacted earth cover much of the site. Stone, concrete walls and fencing of 2.5 to 3.0m high enclose the north, east and southern boundaries of the Site.
- 9.4.5 Land immediately adjacent to the north, west and much of the southern and eastern site boundaries is within employment uses including industrial, warehousing, commercial and retail (see Figure 9.1 Existing Land Uses). Residential uses occur to the north (separated by a narrow band of employment uses) and immediately adjacent to the south-eastern corner of the site. More extensive residential areas occur to the south of Old Kent Road.

Topography and Watercourses / Waterbodies

- 9.4.6 Inner London lies on the broad floodplain of the Thames. Alluvial gravels overlie London Clay, and rise gradually to form the river terraces to the north (Hampstead/Highgate ridge at approximately 100 to 125m AOD) and south (Greenwich Park at approximately 47m, Nunhead Cemetery at 58m AOD and the Sydenham-Shooter's Hill ridge at approximately 100-120m AOD).
- 9.4.7 The site lies about 2.0km to the south and west of the River Thames, within the Thames floodplain. There are no watercourses or water bodies within or adjacent to the site.
- 9.4.8 The internal topography of the site is complex and piecemeal, reflecting current and historic multiple uses within its boundary. The zone immediately inside the site boundaries tends to be up to 3m higher than central areas of the site supported by retaining walls or buildings; levels along the southern edge of the site average about 4.8m AOD, with central areas averaging about 1.8m AOD, sloping down toward the northern boundary at about 1.6 to 1.7m AOD.
- 9.4.9 Land in the immediate vicinity of the Site is low-lying (1.6 to 3m AOD). Levels along the Old Kent Road vary between about 4m AOD near the entrance to Devon Street to the southwest of the site, to about 3m AOD near Hillbeck Close to the south.

Existing Vegetation

- 9.4.10 Existing vegetation within the site is sparse and limited to an evergreen Leyland cypress (*Cupressocyparis leylandii*) hedge and open lawn adjacent to offices in the northeastern quadrant of the site. Intermittent self-seeded native scrub occurs along the eastern and north-eastern site boundaries comprising Butterfly Bush (*Buddleja sp.*) and Bramble (*Rubus fruticosus*). A single tree occurs within the Site, being a young Sycamore (*Acer pseudoplatanus*) of approximately 6m high in the southeast corner (see Drawing No. 3 Townscape Features and also ES Chapter 14 Ecology), although this is severely constrained by adjacent buildings and structures.
- 9.4.11 A number of mature trees occur within the Tustin Estate immediately to the south of the Site, set within grassed areas around Hillbeck House, off Hillbeck Close. Species include Hornbeam (*Carpinus betulus*), London Plane (*Platanus x hispanica*) and Sycamore (*Acer pseudoplatanus*). A central reserve and pathway divides the carriageway of Manor Grove, which is planted with semi-mature and mature trees including Italian Alder (*Alnus cordata*), False Acacia (*Robinia pseudoacacia*), Sycamore, and Lime (*Tilia cordata*). Several of these are in poor condition.

Recreation and Public Rights of Way

- 9.4.12 The site is privately owned and therefore there are no public recreational facilities or public rights of way within or across the site. Linkages with surrounding land uses and public realm are restricted by high walls and fences and adjacent land uses. Public realm within the vicinity of the site includes roads around the periphery, and open space within housing estates to the north, southwest and southeast.
- 9.4.13 The Thames Path follows the course of the River approximately 2.0km to the north and east and is separated from the Site by dense urban development and the embanked South Bermondsey to Peckham Branch Line.
- 9.4.14 Whilst the A2 Old Kent Road is designated as "Other signed on-road cycle route", there are no Sustrans cycle routes adjacent to the Site.

Townscape Character

Mixed Employment Character

- 9.4.15 The prevailing townscape character of the site and land to the east and west is 'Mixed Employment', characterized by large to medium scale warehouses, workshops and sheds set within open storage and parking areas with some pockets of derelict and vacant land (see Figure 9.4 Townscape Character Areas). Building heights range from industrial single storey (approximately 5-6m) to two or three industrial storeys

(approximately 14m). Facades tend to have limited interaction with public realm, typically comprising shuttered vehicular doors or similar. Urban grain is mixed and has no overall distinctive form, following angular routes and, to the east, a rectilinear pattern. Amenity space and planned landscape is sparse, with self-seeded scrub occurring in isolation, giving an overall unrelenting, hard urban appearance. Dominant features include three gasholders (known as numbers 10, 12 and 13) on the adjacent operational gas works site ranging from 22m and 29m to 49m in height respectively, which is the equivalent of 10 industrial storeys or 18 residential storeys (see Thorpe Wheatley Dwg. No. A4638 109). In accordance with the criteria defined in Appendix 9.1, this Character Area is of Low to Very Low sensitivity to change.

Commercial Thoroughfare Character

- 9.4.16 To the south, a 'Commercial Thoroughfare' Character Area prevails, centred along the linear route of Old Kent Road. Converted domestic scale buildings (red brick Victorian/Edwardian properties), large-scale modern retail warehouses, and 20th century retail units of mixed styles, quality and materials typify this area. Building heights range from the equivalent of two to five domestic storeys (about 5.6m to 14m), some community uses add architectural interest such as the Christ Church tower. Active building facades interact strongly with public realm through large glass frontages and display windows. High quality hard surfaces occur frequently along the route, together with some street trees. Some upper floors of units are in residential, office and service uses such as dental surgeries. This Character Area is of Low to Moderate Sensitivity to change.

Medium Density Residential Character

- 9.4.17 Land to the north and southeast of the Mixed Employment Character Area and south of the Commercial Thoroughfare Character Area is characterized as 'Medium Density Residential', interspersed with pockets of 'High Density Residential'. The Medium Density Residential comprises terraces, maisonettes and flats of mixed age ranging from 19th to 21st Century development, generally of domestic scale in terms of building frontages and fenestration/detailing, with either flat or pitched roofs. Buildings and access routes are generally arranged on a rectilinear grid. Brickwork is the prevailing material in varying colours. Heights range between two storeys up to five storeys (about 5.6m to 14m). Planned public realm provides a setting for the buildings, generally comprising grassed areas with street trees and informal groups of trees; some ornamental shrub planting also occurs. Community buildings such as schools, places of worship and community halls are frequent. This Character Area is of moderate to high sensitivity to change..

High Density Residential Character

- 9.4.18 The High Density Residential Character Areas are characterized by tower blocks of over 10 storeys, which are significantly taller than neighbouring structures. These are typically set within open public or semi-public landscaped spaces and date from the 1960's and 1970's. As the pockets are isolated, distinctive urban grain prevails; the towers tend to be grouped in threes. This Character Area is of moderate sensitivity to change.

Visual Context

- 9.4.19 As discussed at Section 9.3 above, the Site falls in line with, but outside of, the background Assessment Area for the London View Management Framework View 2A Parliament Hill to St Paul's Cathedral. Whilst formal assessment regarding this view is not required, the view has been considered in response to consultations with LB Southwark.
- 9.4.20 Close proximity views toward the site from the immediate surroundings are controlled by the generally level to gently north-sloping topography, intervening buildings and structures, and to a lesser extent by trees and other vegetation. Localised tall landmarks including the retained gasholders and high-rise residential blocks on the Tustin Estate to the southeast, and Ledbury Estate to the southwest, and the Rennie Estate off Galleywall Road 500m to the north dominate views within the vicinity of the site. Glimpsed views between and above buildings are gained from surrounding roads and other public realm. Panoramic elevated private views may be gained from the residential high-rise blocks across the area, including the site. Local views toward and across the site are shown on Figure 9.5 Location of Local Views and Photomontages and Figure 9.6 Local View Photographs.
- 9.4.21 Middle and long distance views from the wider area are also controlled by the dense urban form and intervening topography and vegetation. Few locations occur where open space and topography combine to

create an elevated aspect toward the site that is publicly accessible. Such vantage points tend to be to the south and southeast of the Site as the landform climbs from the Thames up toward the Sydenham/Shooter's Hill ridge.

- 9.4.22 The potential for views to be gained of the Site from elevated public viewpoints within surrounding areas has been considered. Several of these view points coincide with protected local views identified by the London Borough of Lewisham. The viewpoints are set out in Schedule 1A of the Lewisham UDP, and range from 1.7km to 6.4km distance from the proposed Site. Of these, the Site is only apparent in views from the nearest viewpoint in the northern section of Telegraph Hill Park; from the remainder of the views identified intervening landform, buildings and trees obscure the Site. Views from Nunhead Cemetery toward the City are channeled along the entrance avenue in a north-westerly direction; views toward the Site in the north are therefore obscured by vegetation within the curtilage of the cemetery itself.

Limitations

- 9.4.23 The visual impact assessment has been restricted to publicly accessible areas; no access was gained to private properties during the survey.

9.5 Incorporated Enhancement and Mitigation

Summary of Proposed Development

- 9.5.1 The Integrated Waste Management Facility (IWMF) comprises three main functional units namely the Mechanical Biological Treatment (MBT), Material Recovery Facility (MRF) and Household Waste and Recycling Recovery Centre (HWRRC) that are grouped together in a linked structure. The structure comprises six 45m wide bays that collectively measure 270m long (north-south). The MBT and HWRRC units are 90m in depth (east-west) and the MRF unit is 152.9m deep. A paired vent stack of approximately 38m AFL would be sited about midway along the north-facing façade of the MBT facility.
- 9.5.2 Each unit has a curved roof to collectively create a 'wave effect', with triangulated external bracing at 12.05m above floor level (AFL); the roof is between 13.7m and 16.2m AFL. A finished floor level of 4.13m AOD is proposed.
- 9.5.3 The linked structures are clad in bluish green profiled sheeting, with service and personnel doors finished in a dark forest green. The curved roof cladding is finished in a soft grey. Architectural features including the building frame and bracing are to be finished in silver grey.
- 9.5.4 Ancillary structures comprise a Resources Centre (38.5m by 23.5m footprint, roof level 7.3m AFL; roof mounted wind turbines would increase the overall height to 9.0m AFL); a vehicle Maintenance Workshop (16.2m by 19.2m footprint and 8.15m AFL height), and a Weighbridge office (13m by 6m footprint and height of 4.15m including roof mounted plant). Two fire sprinkler supply storage tanks (13m and 15m diameter by 6.8m height) are located to the south of the HWRRC.
- 9.5.5 The ancillary buildings are enclosed in horizontally fixed cedar wood boarding. Architectural detailing including window frames, steel columns, louvres etc., will be finished in silver grey echoing the features of the linked structures to the east.
- 9.5.6 The linked structure is located parallel to the eastern boundary from which it is separated by a maintenance access road that wraps around the southern edge of the HWRRC.
- 9.5.7 All operational heavy goods traffic movements are confined to the area to the northwest and west of the site, or internally within the linked IWMF building. Light vehicular traffic and car parking is located to the southwest, south of the Resources Centre. Access to the HWRRC is separated from HGV's at the site entrance; vehicular access to the HWRRC is wholly within the building envelope.
- 9.5.8 Landscape planting will be introduced to the south, southeastern, western and northern boundaries of the Site as shown on Figure 9.13 Landscape Master Plan and Appendix 9.3 Proposed Tree and Shrub Species.

Locally raised ground levels of 2m above remediated site level will provide a platform for semi-mature tree and woodland copse planting in the south-eastern corner of the site to maximize visual mitigation for properties along Manor Grove, Kentmere House and Hillbeck House. To the west of the two fire sprinkler tanks proposed planting comprises native trees and shrubs planted as specimen trees and hedgerow.

- 9.5.9 A linear planting bed will be constructed within the site at the base of the boundary wall immediately to the east of the HWRRC, and a 3m high trellis will be fixed to face and top of the wall. Climbing plants will be established within this bed and trained up the trellis. This would establish high-level vegetation to filter and soften views from Manor Grove and the western-most Kentmere House properties toward the southeast corner of the HWRRC.
- 9.5.10 Ornamental shrub species will be introduced along the 'green corridor' that forms the main site access; species will provide food plants for birds and insects whilst establishing year-round visual and seasonal interest for staff and visitors. The access road will also be flanked by meadow grassland, again to enhance biodiversity, although clipped hedges would establish a structure and formality to this space. Height will be provided by formal tree planting within the staff and visitor car parking areas, with tree planting along the western hedgerow and a woodland copse will also be established in the southwestern corner of the site.
- 9.5.11 Proposed planting along the northern boundary is severely restricted by utility easements. A small woodland copse will be established in the northeastern corner of the site, supplemented by hedgerow, meadow grassland and advanced nursery stock tree planting. Only native species will be used in this area.

Incorporated Enhancement and Mitigation

- 9.5.12 The combined MBT/MRF and HWRRC buildings have been located to the east of the site to maintain safeguarding and safety zones associated with the operational gas works and infrastructure routes to the north and west.
- 9.5.13 The proposed redevelopment provides an opportunity to rationalise existing built form and external treatments including the removal of disparate and poor quality buildings and hard-standings. High quality design forms the basis of the proposed development, incorporating high quality materials. External spaces relate to different building uses, but use of a sympathetic palette of hard landscape materials and plant species create a unifying theme and coherent setting.
- 9.5.14 Grouping and enclosure of recycling facilities within the combined buildings envelope reduces visual clutter compared to existing site uses. Colour-coated metal cladding would enclose the building and is appropriate to the scale and form of the structure. The roof would be a pale grey colour.
- 9.5.15 The proposed roof height of the combined MBT/MRF and HWRRC buildings has been minimized, subject to accommodation of intended uses. Opportunities to vary the height of the proposed stack are limited due to the height of adjacent structures and efficient operation and dispersion of exhausts. Triangulated bracing at eaves level adds articulation and architectural interest to the facades.
- 9.5.16 The proposed development comprises a series of materials recycling and handling processes each set within a discrete structure, although these are interlinked to create the combined buildings. The scale of the combined buildings footprint is notably larger than other buildings within the area, although it is set largely within the context of medium-scale industrial units. Pockets of similarly large-scale structures occur within the wider area (Mandela Way off Old Kent Road 1.4km to the northwest, and Convey Way 1.8km to the east, adjacent to the River Thames).
- 9.5.17 Location of the combined buildings parallel to the eastern boundary creates a physical and visual buffer that shields residential uses to the east and southeast from goods vehicle circulation routes and parking to the northwest, serving the MBT and MRF facilities. The proposed MBT building combines with the large substation structure to the north of the site to provide partial screening for residential properties to the northeast from the main operational activity areas (goods vehicle circulation routes and parking).
- 9.5.18 The Resources Centre comprises a free-standing structure with timber cladding and is appropriate to the scale and educational and administrative functions of the building. This suite of materials is continued in the other smaller-scale buildings of the site including the Weighbridge Office and the Maintenance Workshop.

- 9.5.19 Provision of native tree and shrub planting is proposed to site boundaries (subject to restrictions of utility way leaves and safeguarded zones), and a variety of ecological enhancements would also be incorporated within the landscape scheme (see Ecological report). This includes the creation of a 'green corridor' along the main access route linking to the resources centre that would comprise a landscaped tree belt.
- 9.5.20 Overall, the high quality building designs create distinctive new built form within a previously barren and derelict site; the curved 'wave' roof form of the combined MBT, MRF and HWRC buildings adds interest and creates a striking architectural feature when viewed from the west and east. Variety in Landscape tree and shrub planting is incorporated to critical locations (northeast corner and southeast corner) to enhance, soften and break up the perceived form of the building. Further details of the design principles and inclusive design conditions are set out in the Design and Access Statement that accompanies the planning application.

9.6 Identification and Evaluation of Key Impacts

Introduction

- 9.6.1 The key impacts to the landscape character of the site and surrounding area, and the potential key visual impacts resulting from the development, in both the construction and operational periods, are set out below. The visual impacts are considered at both Year 1 and Year 15 following completion of the development, to take account of impacts with and without the mitigation measures outlined in section 5. Refer to Appendix 9.1 for Assessment Methodology and significance criteria.

Construction

- 9.6.2 Details of the construction programme, sequence, hours of working and general methods are set out in ES Chapter 4: Development Proposals. In summary, the site requires remediation which entails clearance of all structures and vegetation and re-grading of the site prior to the start of building construction. Working hours will be 07:30 to 18:00 Monday to Friday and 07:30 to 13:00 on Saturdays; no Sunday working is proposed. The remediation and site preparation programme will take about 16 months and the construction programme is planned to take about 17 months. The site remediation is the subject of a separate planning application (08/CO/0044) submitted by Southwark Borough Council on 11th June 2008.

Townscape

- 9.6.3 All existing permanent and temporary buildings within the Site would be removed to accommodate the remediation works and subsequent redevelopment. New retaining walls would be built along the northern and western boundaries. A new wall would be built inside and abutting the existing eastern boundary (parallel to the industrial units along Ormside Street). Sections of site boundary walls to the south and southeast would be rebuilt as brick-faced boundary walls. One self-seeded Sycamore tree occurs on site in the southeast corner adjacent to the off-site electricity sub station; this is likely to be lost due to site remediation and site boundary works.
- 9.6.4 A temporary contractors' compound would be established and located to avoid impact with residences, comprising offices and welfare buildings, car parking and laydown/open storage areas. Materials and deliveries would be managed on a 'just-in-time' basis to minimize the extent of storage required.
- 9.6.5 The remediation phase would entail some remodelling of site levels to create suitable development platforms for the proposed buildings, the site access roads and vehicle parking areas; a remediated site formation level of 4.13m AOD is proposed. Existing disused hard standings and foundations would be broken out and removed. Self-seeded existing sparse vegetation on site would be removed, including bramble, buddleia and the conifers. All vegetation would be cleared outside of the bird nesting season.
- 9.6.6 All re-useable materials arising from the demolition work would be sorted and stockpiled temporarily within the site, away from neighbouring residential uses. Materials will be processed and re-used on site where possible to minimize off-site construction traffic movements, and surplus materials would be dispatched for recycling or disposal off site.

- 9.6.7 It is anticipated that tower cranes and crawler cranes would be required for the placement of the building frame, with concrete substructures, roof trusses and cladding panels also requiring hoists, and with smaller tracked cranes used for the smaller buildings. However, whilst these will have an impact in townscape and visual terms their presence will be transitory as they are moved around the site during the short-term construction period, and are considered in the context of current site and traffic activity (see ES Chapter 6: Traffic and Transport).

Views

- 9.6.8 The principal local views toward the Site are from the highway and footways of Old Kent Road and the residential properties of the Tustin Estate to the southeast. Occasional views are gained from higher land further to the south as it rises toward the Shooter's Hill/Sydenham ridge.
- 9.6.9 Limited glimpsed views are gained from the upper floors of some residential properties to the north of the site (off Varcoe Road).
- 9.6.10 The site boundary walls, and temporary site hoardings and fencing, would largely screen ground level construction works, construction staff accommodation and temporary storage areas. Taller construction elements would include tower cranes, piling rigs and the building frame as it is erected, seen above the perimeter screens. These taller elements would be visible over a wide area, although this impact would be temporary and short term.

Night time

- 9.6.11 Lighting during the construction works would be viewed in the context of existing lighting levels on this Central London location, and would therefore influence the immediate Site surroundings only. Tall cranes will have high-level (red flashing) safety lights due to the proximity of the site to London City Airport, and therefore they would be seen from a wider area than the ground level works. Temporary security and task lighting would be required during the construction works in the winter months, which would be designed and maintained to avoid spillage beyond the Site boundaries; control of working hours (ceasing at 18:00 on weekdays) would further mitigate night-time visual impacts. Impacts on neighbouring residential, industrial and commercial properties to the north, east and south would be short-term during site preparation and building frame and cladding; lighting to the west would be screened from residential properties in the south east by the new building as the project progresses.

Operation

- 9.6.12 This section considers the impact to existing views immediately following completion of the development (Year 1). Reference should be made to the photomontages although it should be noted that these are intended to show the maximum footprint, design, height, massing and location of the proposed buildings only, and that they are indicative only in respect of colour, materials, which will be subject to detailed design approval of the Local Planning Authority.

Townscape

- 9.6.13 The main effects on townscape character would be the introduction of new built form, its scale, mass and height, and associated landscape planting. The scale of the combined buildings in terms of footprint is larger than other structures within the immediate area. However, similarly large-scale structures occur within the London Borough of Southwark to the northwest and east (Mandela Way, Southwark and Convey Way, Deptford, SE8). This is offset to some degree by the immediate context of medium scale industrial and commercial units and infrastructure such as the retained gas holders.
- 9.6.14 The roof line of the proposed combined MBT, MRF and HWRRC building would be 13.7m to the eaves and 16.2m high at the apex above finished floor level (FFL); the equivalent to a modern 4 to 6 storey residential building. The maximum roof height would be 20.33m AOD.
- 9.6.15 Although the combined MBT, MRF and HWRRC buildings would represent an increase in the extent and scale of built form within the Site, it is considered that this would be in keeping with industrial, warehousing and large retail land uses within the area.

Medium Density Residential Character Areas

- 9.6.16 Residential uses of medium townscape sensitivity occur to the southeast of the Site, but comprise a very localised area that is presently juxtaposed with low quality industrial and associated uses/character. However, given the poor townscape condition of the Site, the development would remove the neglected appearance of the area and introduce high quality structures and landscape, resulting overall in a slight to moderate beneficial impact to townscape character.

High Density Residential Character Areas

- 9.6.17 High density residential uses within Tustin Estate also occur to the southeast, separated from the site by the medium density residential area. The high rise residential development of Ledbury Estate lies to the south west of the Site, and is separated from it by Old Kent Road and commercial/industrial uses. Indirect effects would occur to the townscape of both of these high-density residential character areas, representing a very low degree of change, although this change would be positive. The impact on this character area during operation of the scheme would therefore be negligible to slight beneficial.

Mixed Employment Character Area

- 9.6.18 The proposed site falls within the mixed employment character area, together with employment uses to the west and northeast, collectively forming an area of very low townscape sensitivity. The degree of change within the Site would be very high as disparate, poor quality buildings, vehicle trafficking areas, vehicle maintenance and parking for both coaches and cars and miscellaneous open storage areas are transformed and replaced by a high quality large-scale structure and landscape setting.
- 9.6.19 The remaining buildings; the resources centre, weighbridge and vehicle maintenance workshop are of smaller scale and would be set within a landscaped green corridor. Taking into account the low sensitivity of the receiving townscape and proximity to the retained gas works site; this would result in a townscape impact of moderate beneficial significance. A comprehensive planting scheme of native trees and shrubs would assist the integration of the buildings into their townscape setting and would in the longer term also enhance the townscape character of the site whilst enhancing biodiversity (see ES Chapter 14 Ecology). Accordingly, a landscape master plan forms part of the planning application (see Figure 9.13).
- 9.6.20 The landscape master plan includes extensive use of native trees, shrubs and grass species and ornamental shrub species that are beneficial to birds, bats and insects (i.e. flowering or fruit-bearing). Stag beetle refuges would also be established on the edge of proposed woodland copse areas. Bird nesting and bat roosting boxes would also be provided.

Commercial Thoroughfare Character Area

- 9.6.21 The commercial thoroughfare character area lies to the south of the Site. Indirect effects would occur to the townscape character of this character area, representing a low to very low degree of change on this area of medium sensitivity; this change would be positive. The impact on this character area during operation of the scheme would therefore be slight beneficial.

Rail Corridor Character Area

- 9.6.22 The Rail Corridor Character Area lies to the east of the site and is separated from it by the mixed employment and medium and high-density residential areas. The degree of change arising upon this low sensitivity character area as a result of the Site redevelopment would be very low, resulting in an effect of negligible significance.

Local Views

Residential

- 9.6.23 Views would be gained toward the proposed MBT building from south-facing residential properties to the north east of the Site at Eagle Close and Gerards Close; existing buildings and boundary walls/fences to the north would screen the lower parts of the building façade. The flues would be visible but not dominant. The

intervening housing and industrial units would screen views from properties off Varcoe Road/northern edge of Eagle Close and Gerards Close. The MBT would screen the MRF and HWRRC to the south. Oblique views from upper floors of the western-most residences on Eagle Close may be gained toward part of the Resources Centre; the weighbridge kiosk and vehicle maintenance workshop would not be visible. A narrow band of hedge and tree planting would be introduced along part of the northern site boundary. Substantial to moderate adverse impacts would occur at Year 1, reducing to moderate adverse at Year 10 as the trees mature.

- 9.6.24 The most significant visual impacts would be experienced by residential properties of the Tustin Estate immediately to the south east of the Site, particularly those properties at Hillbeck House fronting onto the Site, and the western end of Manor Grove and Kentmere House (see Photomontage View D). Replacement boundary walls would screen views to ground level features within the site. Intervening buildings would obscure views from the remainder of low and mid-rise residences within the Tustin Estate further to the east and southeast. Views from the tower blocks (Grasmere Point, Ambleside Point and Windermere Point) would gain oblique views to the extensive roof of the combined buildings, although the curved form and shadow patterns cast by the roof form would articulate it and be read as separate units. Proposed tree planting and trellis with climbing plants in the southeastern corner and along the eastern and southern boundaries of the Site would soften and filter views from the residences immediately fronting onto the site to the proposed HWRRC and MRF by year 10; the ancillary/support buildings would not be visible. Northwest and northeast facing properties at Hillbeck House would experience moderate to slight adverse impacts at Years 1 and 10. The identified properties at Kentmere House would experience Moderate to slight adverse impacts at year 1, reducing to slight adverse at Year 10. For properties at Manor Grove immediately facing onto the site, the impact would be Substantial to moderate adverse at year 1, reducing to Moderate adverse at year 10. For the tower blocks, slight to moderate adverse impacts would occur at years 1 and 10.
- 9.6.25 The residential tower blocks of Ledbury Estate south of Old Kent Road are orientated directly towards the Site and would experience visual effects similar to those of the high-rise Tustin Estate properties, although the MBT building and ancillary/support buildings would be wholly or partly obscured by the retained gas holders. Adverse effects arising from the scale and massing of the linked structure would be offset in part by the removal of poor quality features and the introduction of tree and shrub planting. Proposed planting along the green corridor would soften and partly screen views to the MRF and HWRRC buildings by year 10. Slight to moderate adverse impacts would occur at years 1 and 10.
- 9.6.26 Intervening buildings and sparse vegetation would screen the proposed buildings from low-rise medium density residential properties to the south of Old Kent Road and also off Verney Road/Ryder Drive to the northwest; the development would not form a distinctive element within such views. The effect would be neutral.

Education and Community

- 9.6.27 The five-storey structure of Ilderton Primary School lies to the northeast of the Site, off Varcoe Road. Elevated shallow views may be gained from the upper one or two storeys of the school toward the proposed development, across intervening industrial units along Record Street and Ormside Street. No views would be gained from the school playground towards the operational development (see Photomontage View C). As with employment uses, it is assumed that viewer attention is principally concentrated within the school and therefore the impact would be slight adverse to negligible at years 1 and 10.
- 9.6.28 Pilgrim's Way Primary School lies in close proximity to the Site, off Hillbeck Close. Views from this single storey building are restricted by the height and location of intervening residential properties, established trees and Site boundary walls. Narrow glimpsed views may be gained from the school grounds toward the site, but these do not form a notable element of the view (see Photomontage View B). As with Ilderton Primary School, it is assumed that viewer attention is focused within the school building and therefore the impact would be negligible.

Employment

- 9.6.29 Mixed age employment uses lie to the northwest of the Site off Verney Road. Views from employment buildings would largely be obscured by units along the northern boundary of the Site and would be restricted to narrow 'slot' views between such structures, and toward the upper section of the flues. Impacts arising from the development would be mitigated by the high quality of building design and materials and would be negligible at years 1 and 10.

- 9.6.30 The Ormside Street/Hatcham Road employment area directly abuts the eastern boundary of the Site. Views from this area are generally restricted to those gained from properties along the western side of Ormside Street, where they have rear windows that face the Site. Effects would be mitigated by the introduction of new high quality structures and would be negligible to slight beneficial.
- 9.6.31 Views from employment uses immediately to the south of the Site, north of Old Kent Road (Devon Street/Devonshire Grove/Sylvan Grove) would be partly screened by the Site boundary walls and proposed tree and hedge planting along the southern boundary (see Photomontage View E). The new planting would enhance the high quality buildings and the effect would be negligible to slight beneficial at year 1, and slight to moderate beneficial at year 10 as the planting establishes and matures.
- 9.6.32 Employment land to the west comprises the retained gas works and miscellaneous uses off Ruby Street 'triangle'. Views from this direction would be glimpsed between and above neighbouring buildings and would be seen within the context of the retained gas holders, but would be substantially changes by the development. Such changes are deemed positive, with the replacement of disparate and poor quality structures and open land uses with high quality buildings, and also a landscaped green corridor along much of the western boundary. The impact would be moderate beneficial at years 1 and 10.

Transport Corridors

- 9.6.33 Brief intermittent views are gained toward the Site from the TfL designated Red Route of Old Kent Road between roadside buildings and along side streets including Devon Street, Devonshire Grove, Sylvan Grove and to a lesser extent, Hillbeck Close (west of Bowness House). Receptors include car and other vehicle drivers and passengers, public transport users and pedestrians and cyclists. The most open views would be gained from the entrance to Devon Street; only the upper sections of MRF and HWRRC roof would be visible (see Photo montage View A), with the MRF concealing the MBT sections of the building. Generally views from the rail line would be obscured by intervening development, particularly residential development at Tustin Estate fronting on to Ilderton Road. Fleeting glimpses would be gained toward the site along Manor Grove during north and south-bound journeys, although such views would be softened by tree canopies along Manor Grove.
- 9.6.34 Glimpsed views along Devonshire Grove and Sylvan Grove would be gained northward toward the southern façade of the HWRRC building, the lower section of which would be screened by the Site boundary wall; the remainder of the combined buildings would not be visible. Part of the western fire sprinkler tank would be visible above the retained boundary wall, and would be softened by proposed tree planting. Existing buildings either side of Devonshire Grove and Sylvan Grove would hide the remainder of the HWRRC building and the eastern sprinkler tank.
- 9.6.35 Very brief glimpsed views may be gained along Hillbeck Close (the section to the west of Bowness House) that would be channeled by existing buildings to the east and west; only the southeastern corner of the HWRRC would be visible above Ullswater Court and Hillbeck Close housing. Over time, proposed planting in the southeast corner of the site would soften this view.
- 9.6.36 The South Bermondsey to Peckham branch line is elevated on an embankment about 200m to the east of the Site. Generally views from the rail line would be obscured by intervening development, particularly residential development at Tustin Estate (Heversham House) fronting on to Ilderton Road. Fleeting glimpses would be gained toward the site along Manor Grove during north and south-bound journeys and are dominated by the gasholders to the west, although views to the Site would be softened by tree canopies along Manor Grove. Recessive colouring of the combined buildings would assist in integrating it into the prevailing townscape and so it would not be prominent in the view.

Public and Private Open Spaces

- 9.6.37 Two pockets of open space occur next to each other to the north of the site, comprising the Verney Road nature park to the south, and the Bramcote Grove play area to the north. Ground-level views from both open spaces towards the northern façade of the MBT are obscured by two-three storey housing to the south (Eagle Close and Gerards Close). The upper section of the twin flues may just be visible above the housing, but would not form notable feature within the view. The impact significance would be negligible.

- 9.6.38 The structures of Pilgrim's Way School and Heversham House screen views from open space to the east and southeast of the site within Tustin Estate (to the east of the school and off Ilderton Road). The impact significance would be negligible.

Middle and Long-distance Views

- 9.6.39 Long distance views from Parliament Hill toward St Paul's are focused on the Cathedral approximately 4.2km to the north of the IWMF Site. The Site falls directly within the backdrop of the Cathedral and is therefore hidden by it. The operational impact would be neutral.
- 9.6.40 During construction tower cranes may just be visible in the Cathedral backdrop, but would fall against and be seen in the context of dense urban development on Shooter's Hill/Sydenham ridge. The construction effect would be short term and temporary and be of slight adverse significance.
- 9.6.41 Views are gained towards high-rise buildings in the City across foreground of development south of the River from Telegraph Hill Park (north). Tall structures around development site are visible including residential towers of Tustin and Ledbury Estates, and the gasholders/frames that form the visual context.
- 9.6.42 During construction tower cranes used to erect the building frames and roof would be visible, but should be below the skyline. Ground level activity would not be visible. The construction effect would be short term and temporary and be of negligible significance.
- 9.6.43 The light coloured roof and south elevation of proposed linked buildings would be partially visible behind the existing, adjacent tall structures. The roof of the main building would be seen at a shallow angle and so the 'wave' roof form would be apparent as subtle dark/light shading only. Overall the development would not form a principal element in view, merging into the wider cityscape. The impact significance would be negligible.

Night time

- 9.6.44 The site lies within Central London and is heavily urbanized, as such it is set within a well-lit urban context comprising street lighting and individual site/building lighting. Much of the site will operate 24 hours a day, 7 days a week. The proposed lighting scheme will comprise (see Thorpe Wheatley Dwg. No. A4638 115P External Lighting Layout):
- 24 no. external down-lighting luminaires at 10m height mounted on the main operational building's walls.
 - 2 no. external down-lighting luminaires at 8m height mounted on the Vehicle Workshop's walls.
 - 10 no. external down-lighting luminaires at 10m height mounted on the Resource Centre's walls.
 - Low-level lighting in the car parking and pedestrian areas.

9.7 Mitigation

- 9.7.1 Mitigation and enhancement measures have been incorporated into the scheme design, as described at Section 9.5: Incorporated Enhancement and Mitigation, and set out on Figure 9.13 Landscape Master Plan. No further mitigation measures are proposed.

9.8 Residual Impact

- 9.8.1 Residual significant (i.e. substantial or moderate adverse) impacts are those that would remain following the implementation of proposed incorporated enhancement and mitigation measures. With regard to the IWMF proposals, significant residual effects are limited to those relating to a handful of residential properties to the southeast (Hillbeck House and Manor Grove) and northeast (Eagle Close and Gerards Close) corners of the Site. Within the wider area, residential properties would experience visual impacts of slight adverse to slight beneficial.

9.8.2 Elsewhere, beneficial impacts would accrue in the wider area in townscape character and visual terms from the restoration of the site, with high quality design and landscape enhancement. Benefits would be slight to moderate beneficial.

9.8.3 Residual impacts, their magnitude and significance are summarised in Table 9.1 below.

Table 9.1: Summary of Residual Impacts

| Phase | Impact | Impact Type | Magnitude | Significance | Geographical Level of Importance of Issue | | | | |
|-----------|---|---------------------------------|----------------------|-------------------|---|---|---|---|---|
| | | | | | I | N | R | B | L |
| Operation | Townscape Medium Density Residential Character Area (Tustin Estate) | Indirect Adverse | Low to Medium | Minor to Moderate | | | | | * |
| Operation | Visual Residential properties at: Manor Grove (7), Hillbeck House (4), Eagle Close (6) and Gerards Close (9) | Permanent Adverse to Negligible | Medium to Negligible | Moderate | | | | | * |

Key: I: International N: National R: Regional B: Borough L: Local

9.9 Conclusions

9.9.1 In conclusion, the general widespread improvement and beneficial effects on views and landscape character gained by reclamation of the site and introduction of high quality design and landscape planting needs to be weighed against localised adverse impacts on a few properties to the south east and northeast of the site. Overall seven residential properties at Manor Grove, seven at Hillbeck House and six and nine at Eagle Close and Gerards Close respectively, would experience permanent adverse visual impact of moderate significance. Elsewhere, landscape mitigation would successfully reduce short-term impacts on residential properties where views are gained to the site to slight adverse to negligible.

9.9.2 Long-term visual impacts upon local education and community buildings would range from slight adverse (Pilgrim's Way Primary School) to slight beneficial (Christ Church and Livesey Museum).

9.9.3 The reclamation of the site and general improvement in quality of design would lead to an overall slight beneficial effect on local employment receptors, and transport corridor visual receptors (principally users of Old Kent Road) would experience moderate beneficial effects.

9.9.4 Views from local public open spaces would generally be screened by intervening development and so effects would be negligible.

9.9.5 London View Management Framework View 2A from Parliament Hill to St Paul's Cathedral would not be affected by the development, being wholly hidden behind the mass of the Cathedral. No other protected views would be affected.

9.10 References

1. ODPM (2005) Planning Policy Statement 1: Delivering Sustainable Development, HMSO
2. GLA (2008) The London Plan
3. GLA (2007) London View Management Framework
4. LB Southwark (2007) The Southwark Plan
5. <http://www2.lewisham.gov.uk/lb/planning/udp/images/sch1a.gif> accessed 11th March 2008.
6. LI/EMA (2002) Guidelines for Landscape and Visual Impact Assessment
7. Countryside Agency & Scottish Natural Heritage (2002) Landscape Character Assessment Guidance for England and Scotland
8. www.magic.org.uk accessed 11th March 2008.