



TOWNSCAPE AND VISUAL APPRAISAL

THE LEAS PAVILION
THE LEAS, FOLKESTONE

REF. NO. 5498-LLB-RP-L-0001-S4-P02

STATUS: PLANNING

DATE: 24.04.20

REVISIONS

REVISION P01 - 17.04.2020	Initial issue.
REVISION P02 - 24.04.2020	Minor amendments in accordance with received architect's proposals.

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1. INTRODUCTION

- 1.1 This document has been produced on behalf of Gustavia Ltd to accompany a planning application for development at the Leas Pavilion, The Leas, Folkestone, Kent. Lloyd Bore were instructed in March 2020 to undertake a Townscape and Visual Appraisal of the proposals for the site.
- 1.2 This is not a Landscape and Visual Impact Assessment, or a Landscape and Visual Appraisal, as the proposed development site is located in an urban context. The methodology adopted for this study, however, generally follows the guidance set out in the 'Guidelines for Landscape and Visual Impact Assessment' published by the Landscape Institute and Institute of Environmental Management and Assessment (Third Edition, 2013).
- 1.3 The proposal does not constitute EIA development for which an Environmental Statement would be required. A Townscape and Visual Appraisal produced as part of a non EIA development is not required to assess the "Significance" of townscape and visual effects and will consider only the magnitude of change that would be brought about by the proposed development and the nature of the potential effects in terms of whether they are considered beneficial, adverse, or neutral.
- 1.4 The report will:
- Describe existing baseline conditions with regard to key townscape components
 - Appraise the existing townscape in terms of character and views, and establish its ability to accommodate change in relation to the proposed development.
 - Describe the anticipated changes resulting from the proposed development and assess the 'nature of change' upon townscape character and views.
 - Determine the nature of effect of identified impacts with regards to scale, duration, permanence and value, and the capacity of the site to accommodate the type of development proposed.
 - Consider options for mitigation if / where appropriate.

ABOUT THE AUTHOR

- 1.5 This report has been compiled by Julian Bore on behalf of Lloyd Bore Ltd.
- 1.6 Julian is a Chartered Landscape Architect and Managing Director at Lloyd Bore Ltd (established 1996), which is a specialist practice offering consultancy services in Landscape Architecture, Ecology and Arboriculture, based in Canterbury, Kent. He has over 30 years post qualification experience in landscape architecture and landscape assessment work, including many years' involvement in Landscape and Visual Impact Assessment projects.

GUIDANCE

- 1.7 The approach adopted for this report has been informed and guided by the following key sources:
- *The Landscape Institute and Institute of Environmental Management and Assessment, Third Edition, 2013. Guidelines for Landscape and Visual Impact Assessment (GLVIA).*
 - *The Countryside Agency and Scottish Natural Heritage, 2002.*
 - *Landscape Character Assessment: Guidance for England and Scotland.*
 - *Landscape Institute Advice Note 01/11. Photography and photomontage in landscape and visual impact assessment;*
 - *Scottish Natural Heritage, Visual Representation of Wind Farms, Version 2, 2014.*
- Note. The latter two documents are relevant to specialist photographic methodology only, generally in relation to CGI work.*

ASSESSMENT APPROACH

- 1.8 The purpose of this exercise is to describe the general townscape and visual characteristics of the site and its context, its overall sensitivity and to make a judgement about its capacity to accommodate new development of the type proposed. The methodology used in compiling this assessment is described in **Appendix 1** of this report.
- 1.9 The Landscape Institute published 'GLVIA3 *Statement of Clarification 1/13 June 2013*' to provide clarification of the effect of the latest LVIA guidance upon the recommended approach for undertaking landscape and visual impact assessments.
- 1.10 With specific reference to 'Non EIA Landscape and Visual Impact Appraisals' this states;
- 'In carrying out appraisals, the same principles and process as LVIA may be applied but, in so doing, it is not required to establish whether the effects arising are, or are not significant given that the exercise is not being undertaken for EIA purposes.*
- The reason is that should a landscape professional apply LVIA principles and processes in carrying out an appraisal and then go on to determine that certain effects would be likely be significant, given the term 'significant' is enshrined in EIA Regulations, such a judgement could trigger the requirement for a formal EIA.*
- The emphasis on likely 'significant effects' in formal LVIA stresses the need for an approach that is proportional to the scale of the project that is being assessed and the nature of its likely effects. The same principle - focussing on a proportional approach – also applies to appraisals of townscape and visual impacts outside the formal requirements of EIA'.*

STRUCTURE OF THE REPORT

1.11 In relation to the above, this TVA report will be based on the principles set out for a *Landscape (Townscape) and Visual Appraisal* and will adopt the following general flow / structure:

Introduction

- 1.12 This section introduces the type and structure of the report.
- 1.13 It includes relevant information about the author, their qualifications and professional experience

Scoping

- 1.14 This section establishes the study area and scope of the appraisal.
- 1.15 It identifies the relevant issues which need to be included in the assessment and those which can be appropriately 'scoped out'.

Project Description

- 1.16 This section describes the key features and components of the proposed development, usually based on information provided by the project client and / or architect.

Baseline Studies

- 1.17 This section describes the existing townscape and visual environment. It identifies appropriate townscape receptors and character areas. It describes the visual context and accessibility of the site, the likely visual receptors and representative viewpoints.

Identification Of Effects

- 1.18 This section briefly summarises the anticipated impacts and resulting effects that would arise from the operational phase of the proposed development, upon townscape character and visual amenity.
- 1.19 It identifies the nature of these effects in terms of whether they will be direct / indirect / secondary, short / medium / long-term, permanent / temporary, beneficial / adverse or neutral.
- 1.20 These are determined by consideration of the size / scale, geographic extent, duration and reversibility of the impact.

Summary and Conclusion

- 1.21 This section provides a non-technical summary of the main conclusions resulting from the appraisal, and discusses the place of mitigation.

Appendix: Methodology

- 1.22 This section comprises a technical summary of the methodology used in the production of the assessment.

2. SCOPING

2.1 The following section will:

- Describe the general area of study.
- Identify the relevant sources of landscape and visual information.
- Identify the nature of possible impacts, in particular those which are considered likely to occur and to be relevant.
- Identify the main receptors of the potential townscape and visual effects.
- Establish the extent and appropriate level of detail required for the baseline studies, including identifying those issues which can be 'scoped out' from further assessment.

ESTABLISHING THE STUDY AREA

2.2 In Landscape and Visual Impact Assessment work a study area can normally be defined by a circle of given radius. Landscape character is usually derived from broad-scale components such as topography and geology, vegetation characteristics, drainage patterns, broad land use patterns and so on.

2.3 By contract, townscape character is usually highly localised, and can change dramatically within a few streets or blocks. For this reason a defined study area 'circle' has not been defined, and the townscape and visual appraisal concentrates instead on parameters that relate to the specific urban area (or zone) within which the appraisal site is located, and for this a 1km square centred on the site has been selected for general mapping purposes (opposite).

2.4 In organising field work, however, a decision was made to explore views from outside this 1km square zone, to the north, specifically from positions within the Kent Downs AONB.

SOURCES OF INFORMATION

2.5 Preliminary desktop investigations have identified the following sources of key information to be relevant to this assessment:

- OS digital mapping data.
- MAGIC online mapping data.
- Historic England Listed Building and Scheduled Monument Listings.
- Local Plans / Proposal Maps / Policies
- Supplementary Planning Documents
- Conservation Area Assessment.

NATURE OF POTENTIAL EFFECTS

Townscape Effects

2.6 The anticipated effects of the proposed development upon townscape resources are assessed to be:

- Potential change to the townscape character of the site and its surroundings as a result of:
 - A change in land use and introduction of new built form onto a previously developed site
 - alteration in the urban grain pattern
 - restoration of a derelict listed building

Visual Effects

2.7 The anticipated effects of the proposed development upon visual resources are assessed to be:

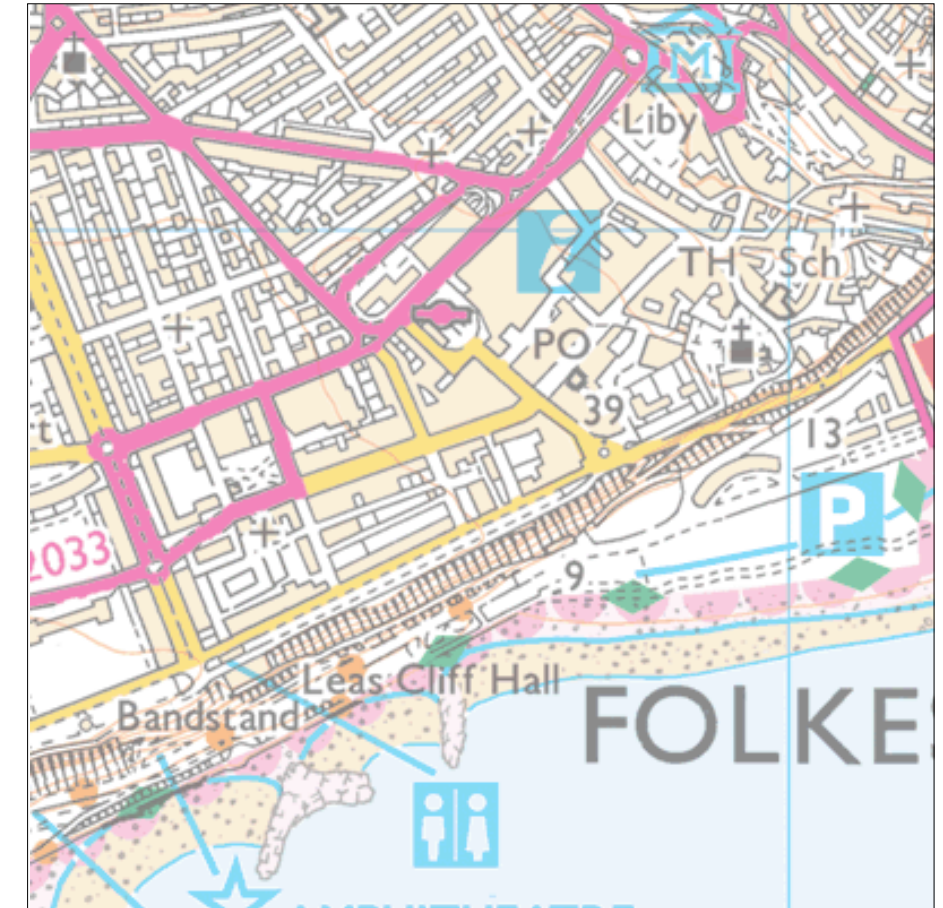
- A change in the nature and composition of the visual townscape resulting from changes to the character and appearance of the site. This could potentially affect the amenity value associated with views from;
 - Nearby roads and Public Rights of Way.
 - Adjoining properties.
 - The coastal zone and recreational area.
 - Kent Downs AONB.

RECEPTORS

Relevant Topics

2.8 On completion of a preliminary desktop review of the study area, the following topics are considered relevant for inclusion within the detailed assessment, as impacts may potentially occur as a result of the proposed development.

Fig. 1: Site context (not to scale).



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Townscape Receptors

- 2.9 Potential townscape receptors of impacts and resulting effects of the proposed development are assessed to be:
- Topography and geology
 - Land use and vegetation
 - Public highways and public rights of way.
 - Urban grain and building heights
 - Townscape character - Folkestone Conservation Area Appraisal; character areas 1) The Leas and Seafront, and 2) West End of Folkestone.
- 2.10 Relevant planning policy from national (NPPF) to local plan policy is addressed in the planning statement that accompanies the planning application.

Ecological, Wildlife and Nature Conservation based receptors

- 2.11 Whilst these designations may provide an indication that a landscape or townscape is of a certain character or quality, they are not designations which have been applied for a particular landscape / townscape character or level of visual amenity. For the assessment of townscape and visual impacts, their only relevance is in relation to TVIA, where they may influence the assessment of a townscape's 'Importance' and 'Value'.
- 2.12 Although these topics are not assessed in detail as part of this appraisal, a separate ecological survey of the site has been undertaken by the project ecologists, which included a hibernating bat survey. No protected species were found on the site. The recommendations of the project ecologists include for ecological enhancement through native-species planting and the incorporation of bird and bat boxes into the architecture.

Visual receptors

- 2.13 Potential visual receptors of impacts and resulting effects of the proposed development are assessed to be:
- users of nearby highways and Public Rights of Way.
 - tourists, holidaymakers and visitors to The Leas, Lower Sandgate Rd, the beach and the harbour.
 - occupants of adjoining properties, including private residential properties and offices.
 - users of lanes and footpaths on the Kent Downs AONB with distant views towards the coast.
 - occupants of seagoing craft on the English Channel.

Non Relevant Topics to be scoped out

- 2.14 All other landscape related topics not listed above are excluded from further detailed assessment on the following grounds:
- The topic or issue is not present within the study area, or is at a sufficient distance from the proposal site that it can be readily accepted that there would be no potential for any impact or change to occur.
 - Although the proposal would result in an impact or change upon a topic or issue, the change is considered to be of an insignificant scale compared to the size and scale of the topic being affected. An example would be the effect that a small domestic development might have on a National Character Area.
- 2.15 The following topics will not be impacted as a result of the development of the appraisal site.:
- National Parks.
 - Ancient monuments.
 - Registered Parks and Gardens.
 - World Heritage Sites / Buffers.
 - Green Belt / Green wedge or other anti-coalescence policy.

3. PROJECT DESCRIPTION

- 3.1 The following project description is based upon information provided by Hollaway Architects.

KEY FEATURES AND COMPONENTS

- 3.2 The main scheme components are summarised below:

- Construction of a single new building accommodating 91 new apartments (1 bed, 2 bed and 3 bed).
- Restoration of the Leas Pavilion for community use.
- Provision of 39 parking spaces partially below ground

- 3.3 The architectural drawings and images shown in this section of the report are intended to provide an indication of the overall design, scale and massing of the proposed building, together with fenestration, selection of materials and colour. These were provided by the architect at a late stage in the planning design process. Some of the images may show details slightly at variance with the final set of drawings submitted by the architect for the planning application, due to late design changes. This is not unusual in LVA/TVA work and will not affect the methodology or conclusions of this appraisal.

New building - architectural style, materials and appearance

- 3.4 The proposed new building will span across the retained and restored Leas Pavilion, with the historic ceiling lantern of the Pavilion retained.
- 3.5 Each apartment will have an external terrace and sea view. The building has been designed to allow the Leas Pavilion to be used as the main entrance to the residential apartments, with secondary residential entrances to be used during community event times.
- 3.6 The height of the very top roof of the proposed building is 71.550 AOD. This excludes the lift shafts which add an additional 600mm to two points on the roof.
- 3.7 By comparison the height of the tower at No.1 The Leas is 76.2m AOD with the top of the residential block at 71.1m. AOD. Pavement level is at 39.46m AOD adjacent to No1 The Leas.
- 3.8 Massing and proportions for the new building have been influenced by a horizontal and vertical analysis of the adjacent Longford Terrace, including details of floor to ceiling heights, window and ledge heights, eave and ridge heights, and bay widths.

Fig. 2: CGI view from Sandgate Road along Cheriton Place



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PLANNING

- 3.9 The detailing of the vertical bays containing the fenestration on the former hotel buildings (information available from historic photos and postcards) created a horizontal ripple effect which the architect has interpreted into the elevational treatment of the new building and its balconies.
- 3.10 The fenestration will also fulfil the original function of bay windows in classic seaside architecture to maximise views across the sea for every apartment.
- 3.11 The conceptual design for the new building also takes reference from two historic landmark buildings located further west on The Leas, the Metropole and Grand Hotels. In particular, reference is taken from the symmetrical elevational treatment of these buildings, the use of vertical 'tower' elements, and the horizontal layering effect particularly apparent at the Metropole where the top layer of accommodation is tiered back into the roof.
- 3.12 Adopting this architectural precedent, above the fifth floor the massing of the proposed building will be stepped back to create a similarly tiered effect, reducing its scale and apparent height when viewed from nearby street level.
- 3.13 The symmetrical wings of the building are designed to wrap around and protect the restored Pavilion. At the same time these will be splayed at an angle to allow the Pavilion to maintain its visual and functional relationship with The Leas.
- 3.14 Vehicular access to the below-ground car parking will be gained from Longford Way and Longford Terrace.
- 3.15 In terms of materials, the plinth of the new building will be terracotta-coloured reconstituted stone cladding as a reference to the Pavilion itself. The architect states that this is designed to emphasise the pavilion in the street scene. The finish for the plinth will be left very simple and unadorned, to make it clearly distinct historically from the original elevational finish of the Pavilion.
- 3.16 The cladding for the new building will be a light-coloured reconstituted stone. Balconies will be fixed pane glass with metal louvres for venting.

Fig. 3: CGI view from Sandgate Road through pedestrian link to Longford Terrace



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PLANNING

Leas Pavilion restoration

- 3.17 The Leas Pavilion itself has been subject to significant alteration in the past, including a makeshift stage constructed beneath the gallery at the far end of the building in 1906, and a formal stage constructed at the north end of the building in 1928.
- 3.18 Under the current proposals it is intended that the main hall of the Leas Pavilion will be restored to its previous Edwardian grandeur providing an impressive entrance for residents and for community events.
- 3.19 The building frontage has suffered serious structural damage. Specialist structural work will be undertaken to stabilise the facades and restore them. The frontage terracotta is damaged in several places and will require specialist repair. There is also serious ingress of water.
- 3.20 Other than the structural elements, key features for restoration include the decorative stained glass windows in the front elevation, ceilings and ceiling lanterns and interior timberwork and wall decorations, as well as refurbishment with historically accurate period decor and lighting, as advised by heritage experts.

Fig. 4: CGI view along Longford Terrace



Fig. 5: CGI view junction of Cheriton Place and Longford Way



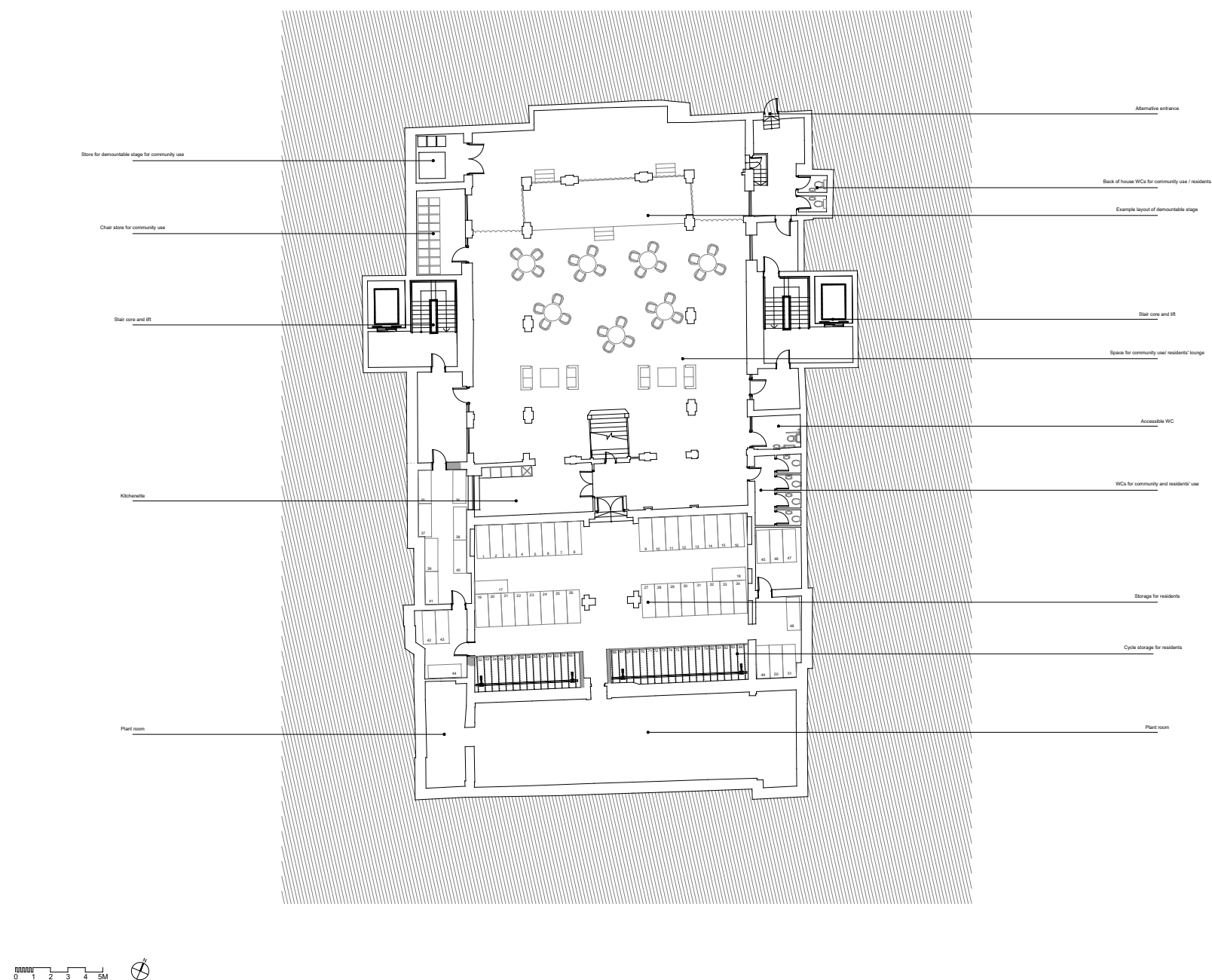
Fig. 6: CGI view from Pleydell Gardens (north)



Fig. 7: CGI view from Pleydell Gardens (south)



Fig. 8: Guy Holloway Drawing 19.098-032 - Proposed Lower Ground Floor Plan



Hollaway

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Project | THE LEAS PAVILION, THE LEAS
FOLKESTONE

Client | GUSTAWA LTD.

Title | LOWER GROUND FLOOR PLAN

Status | PLANNING

Scale: 1" = 1'00" Date: 12.03.20 Drawn: AB Chk'd: ME

Project Number Drawing Number Revision
 19.098 032 _____

Box Number

Fig. 9: Guy Holloway Drawing 19.098-033 - Proposed Ground Floor Plan

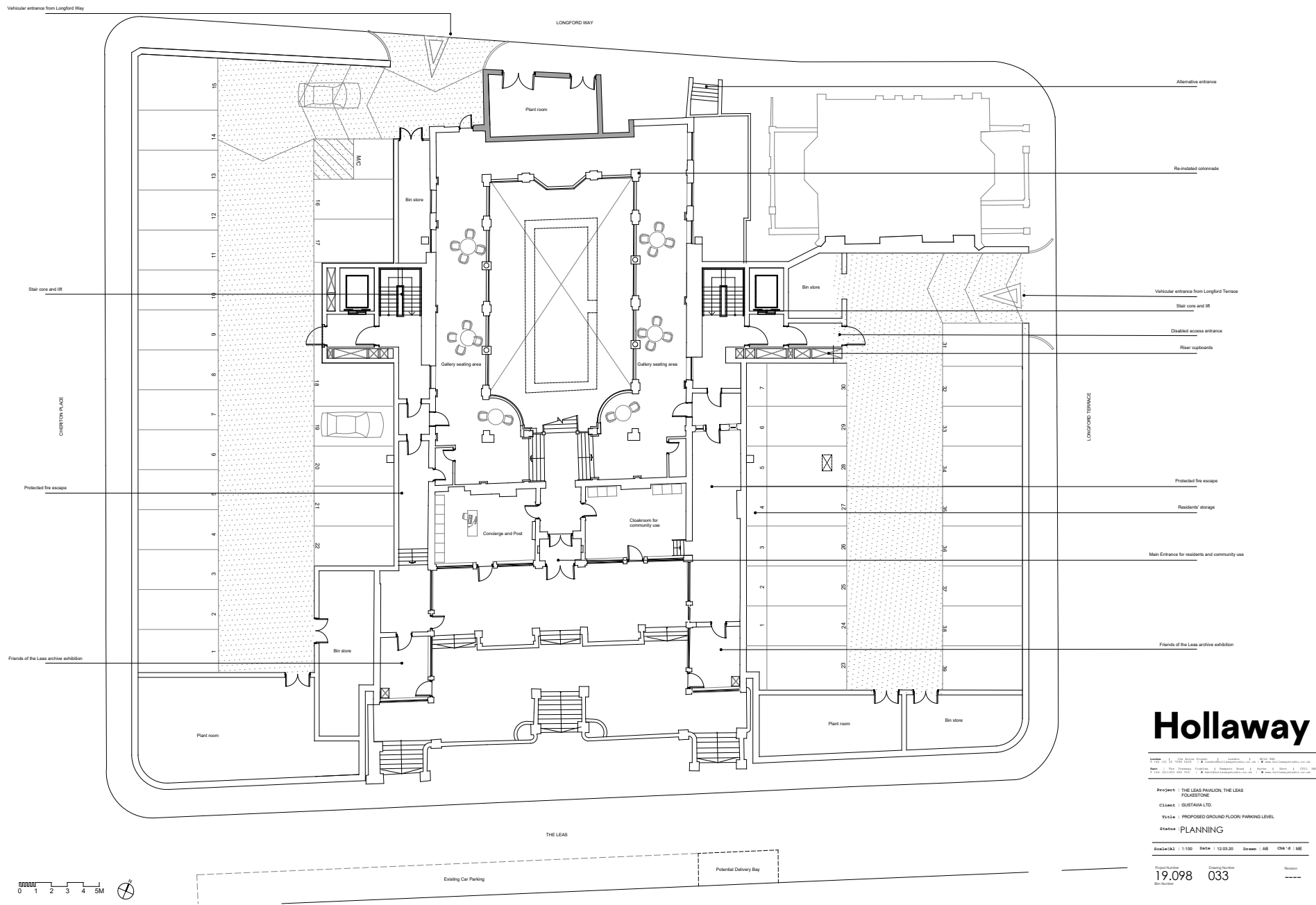


Fig. 10: Guy Holloway Drawing 19.098-035 - Proposed Second Floor Plan

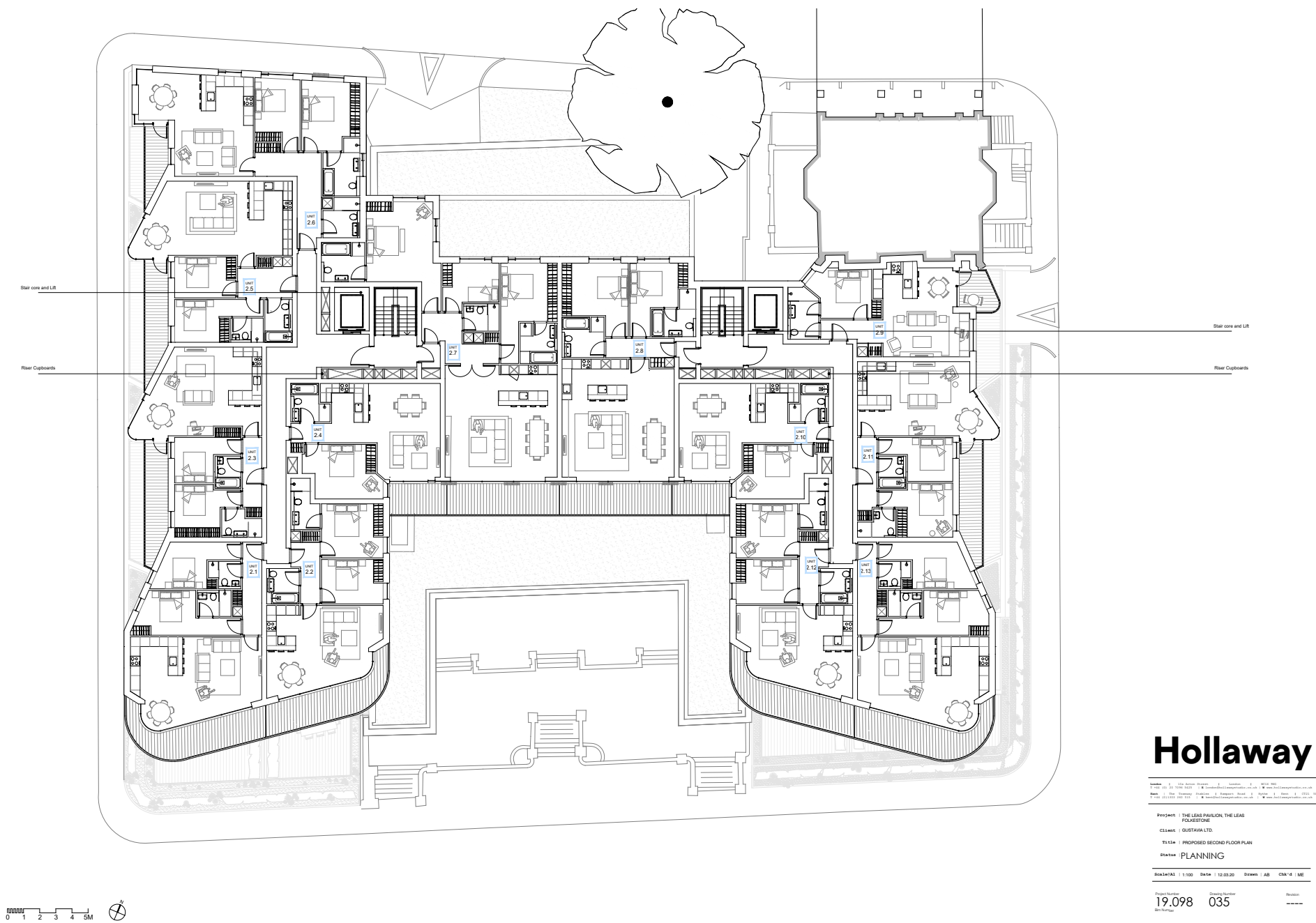


Fig. 11: Guy Holloway Drawing 19.098-031 - Proposed Roof Plan

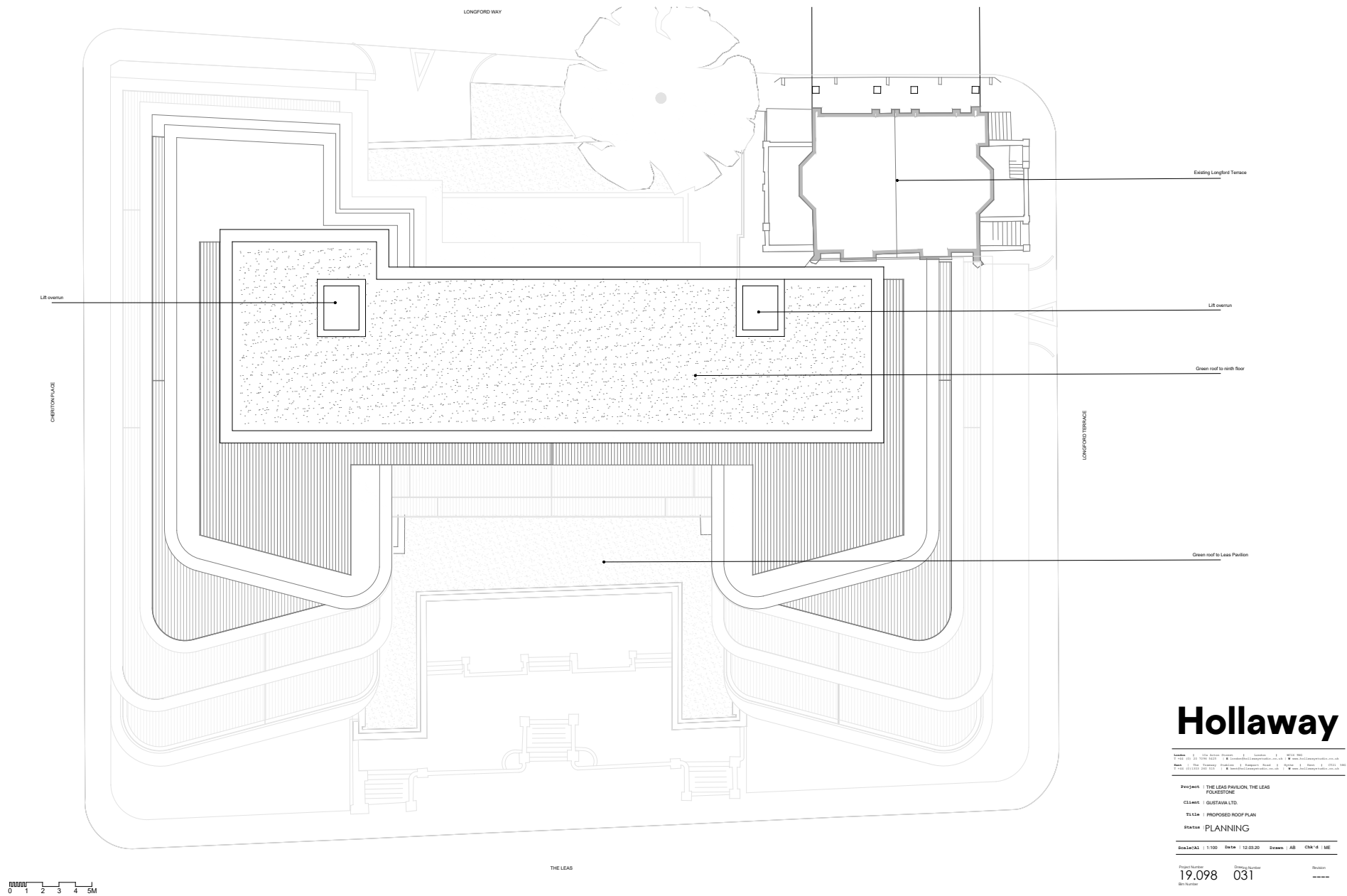
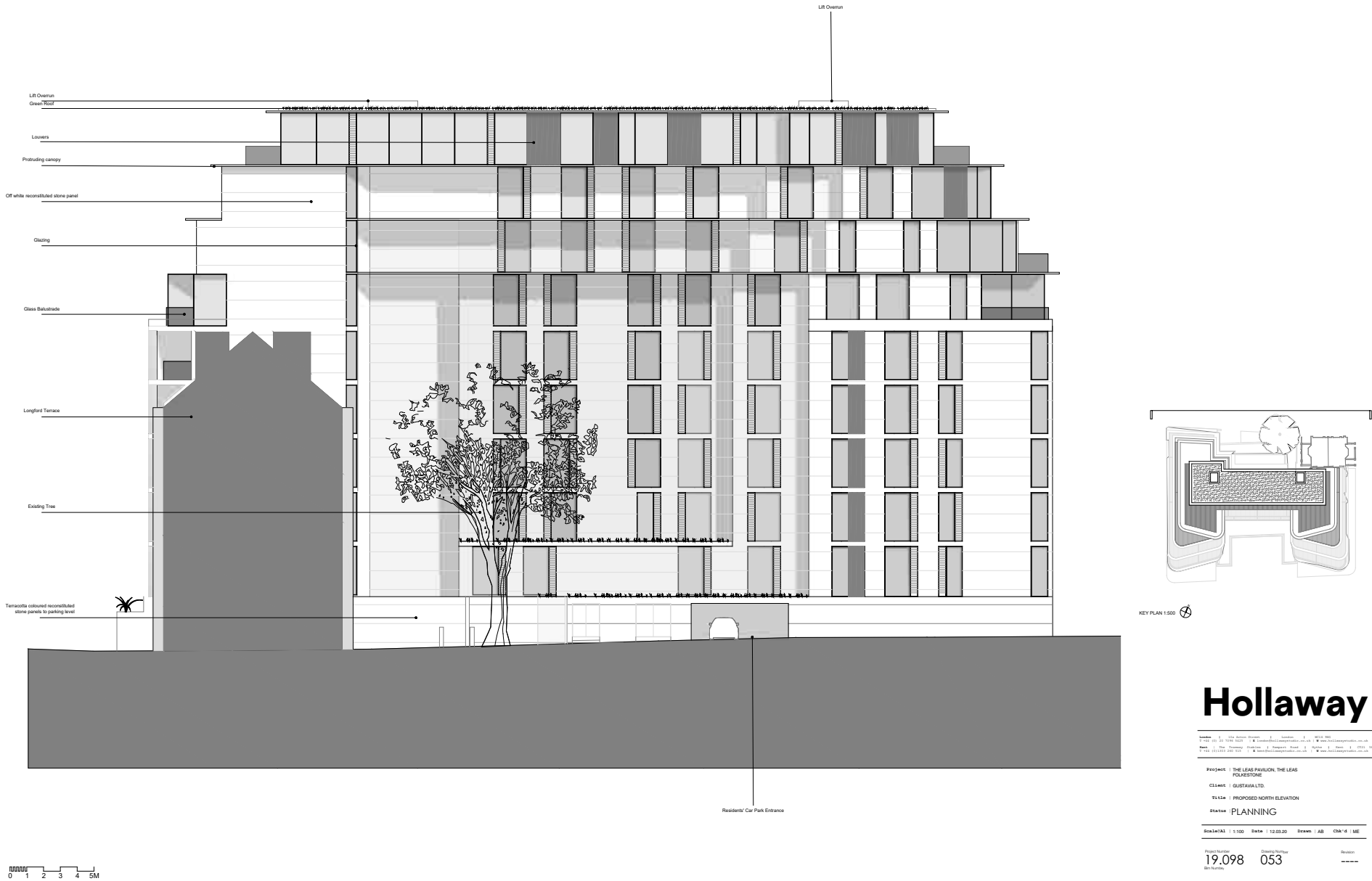


Fig. 12: Guy Holloway Drawing 19.098-053 - Proposed North Elevation



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PLANNING

Fig. 13: Guy Holloway Drawing 19.098-054 - Proposed East Elevation



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PLANNING

Fig. 14: Guy Holloway Drawing 19.098-051 - Proposed South Elevation

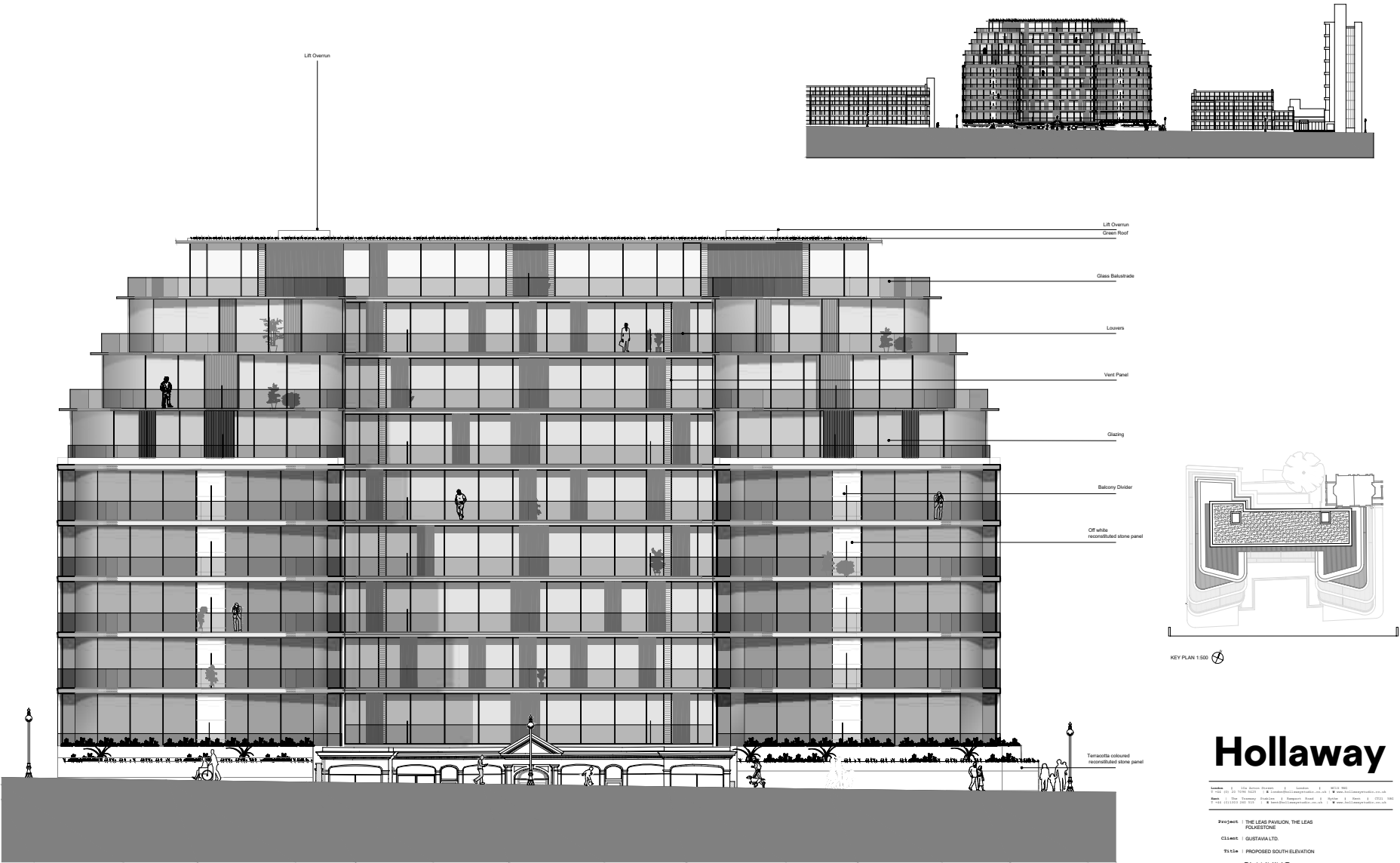
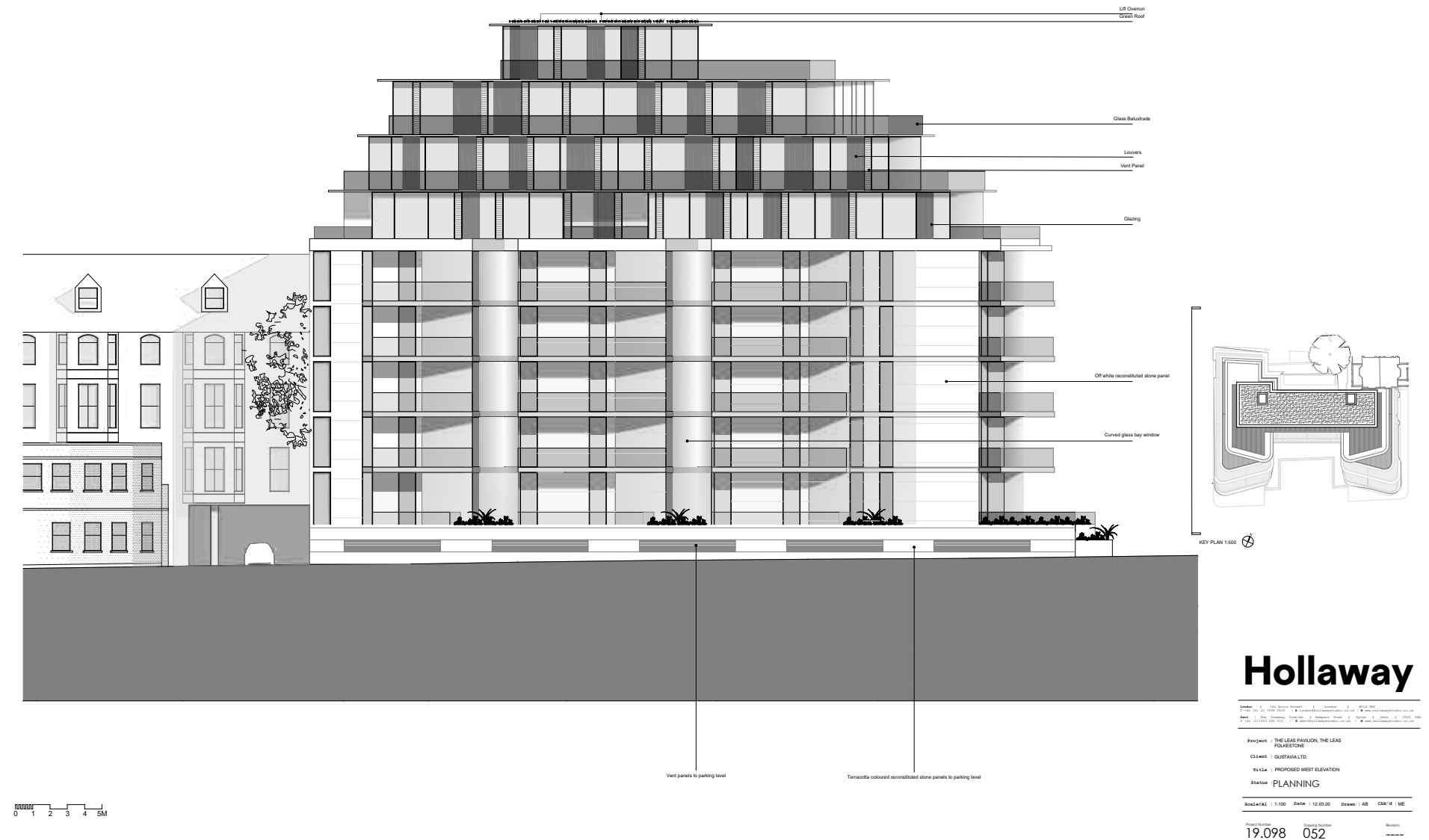


Fig. 15: Guy Holloway Drawing 19.098-052 - Proposed West Elevation

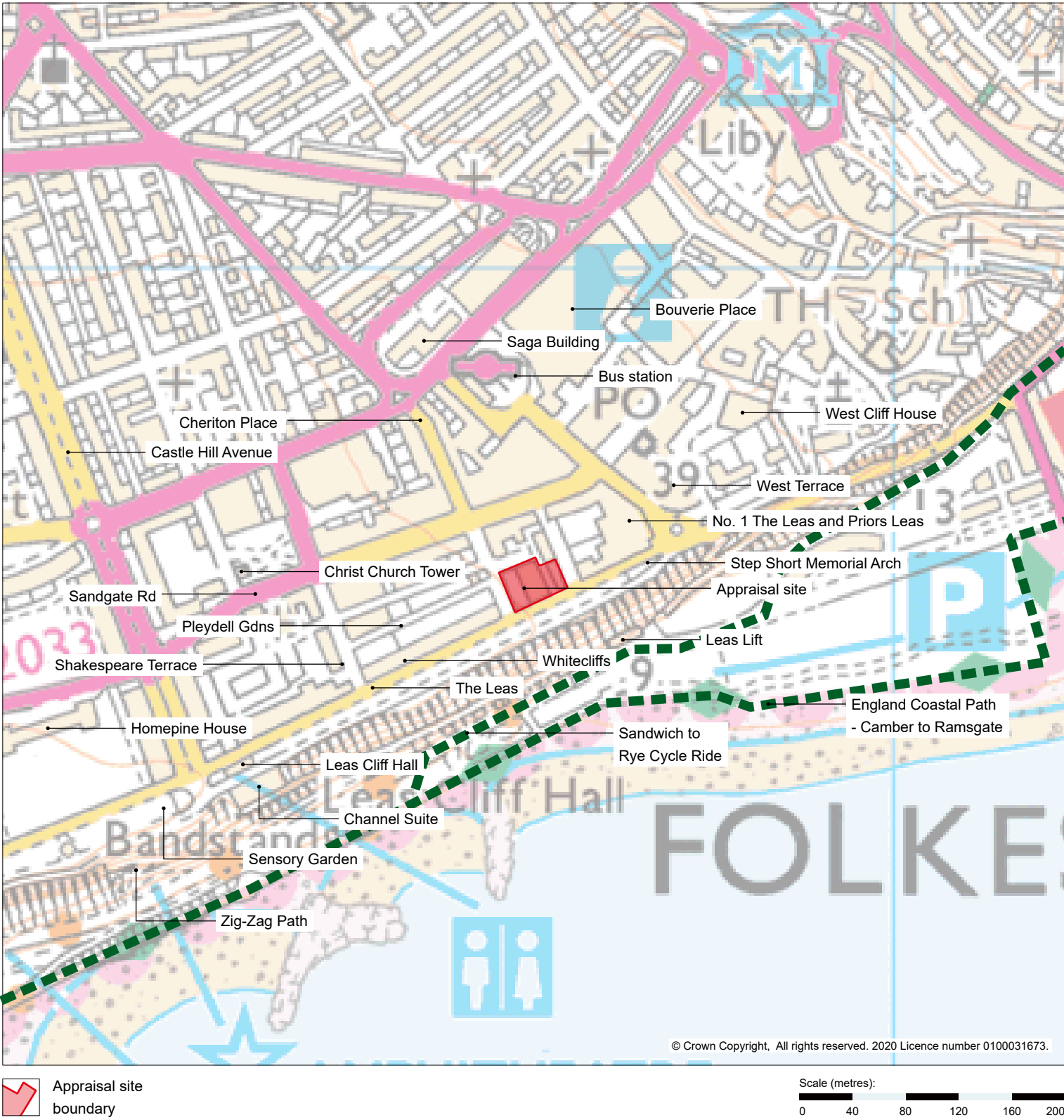


4. BASELINE STUDIES

THE SITE AND SURROUNDINGS

- 4.1 The location and extent of the appraisal site is shown in **Fig. 16 (approx. site centre:622661.25, 135751.25).**
- 4.2 The appraisal site comprises a parcel of land located on The Leas in Folkestone. It is bounded by The Leas to the south, Cheriton Place to the west, Longford Way to the north and Longford Terrace to the east.
- 4.3 The site is rectangular in shape, and extends to approx. 0.26 ha (0.64 acres). It is located within the Folkestone & Hythe District Council administrative area.
- 4.4 The land is occupied by the former Leas Pavilion building and two privately run pay and display surface car parks - Cheriton Place Car Park to the west and Longford Terrace Car Park to the east.

Fig. 16: Ordnance Survey map indicating site location and surrounding features.



ACCESS AND KEY FEATURES

- 4.5 An aerial image is shown in **Fig. 17**. This shows the appraisal site in the context of The Leas, the immediate urban area, the Leas cliff and coastal park.
- 4.6 The Leas Pavilion is currently disused and not publicly accessible. The frontage (former public access) is boarded and fenced to prevent unauthorised access.
- 4.7 Current access to the two car parks is gained from Cheriton Place (western car park) and Longford Terrace (eastern car park).
- 4.8 The area in the immediate vicinity of the site is highly permeable for vehicles and pedestrians due to the dense and geometric street pattern in this part of Folkestone.
- 4.9 Footfall is high due to the location of the site between residential, retail and office areas to the north, west and east, including Sandgate Rd and Bouverie Place, and the popular esplanade of The Leas, with its numerous features and attractions:
- Step Short Memorial Arch and gardens
 - Lower Leas Coastal Park, play area and amphitheatre
 - Folkestone beach and harbour
 - Leas Cliff Hall.

Fig. 17: Aerial photography - flown 15th April 2015



TOPOGRAPHY AND GEOLOGY

- 4.10 Topographical information is shown in **Fig. 18**. Geology in **Figs. 19** and **20**.
- 4.11 The topographic character of the study area is dominated by the dramatic Leas Cliff and coastal strip. Folkestone itself rests almost completely on the Folkestone Beds. These are soft, fine, light brown or greenish sands, sometimes with intervening bands of calcareous sandstone and irregular seams of ferruginous carstone (another type of sandstone). These form most of the Leas Cliff face and are also well exposed at East Cliff, backing the beach and promenade to the east of the harbour area.
- 4.12 The urban area of Folkestone extends inland northwards as far as the M20 and the North Downs escarpment in places, but at the coast the product of geology and topography has resulted in a dramatic coastal townscape edge, set back from the crest of the ridge by the Leas.
- 4.13 The site itself is located above the lower coastal strip and is flat, at approximately 40m AOD. Much of the Leas Pavilion was constructed at a lower level than the surrounding streets, to the extent that it has very little presence in the wider townscape.

Fig. 19: Geology - Bedrock

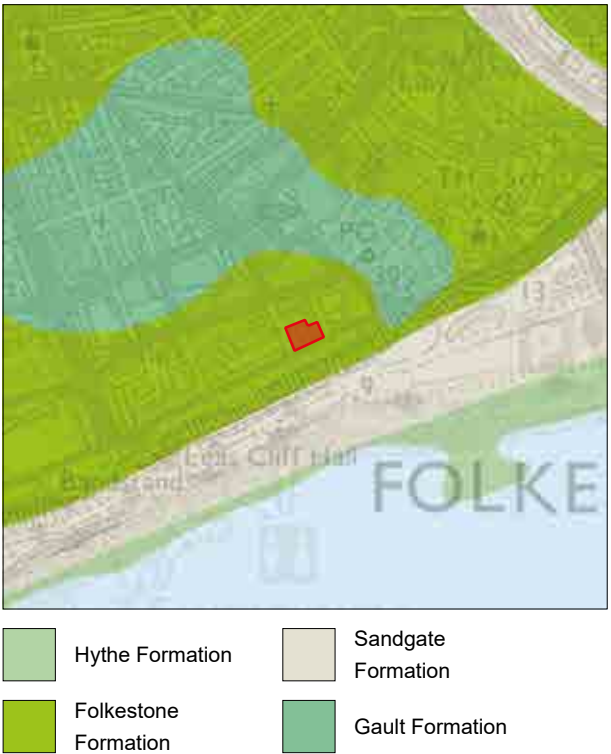


Fig. 20: Geology - Superficial

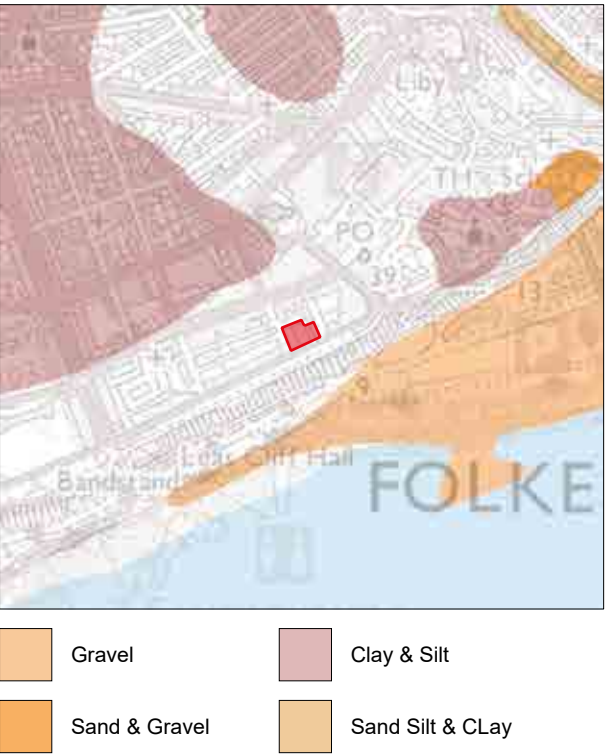


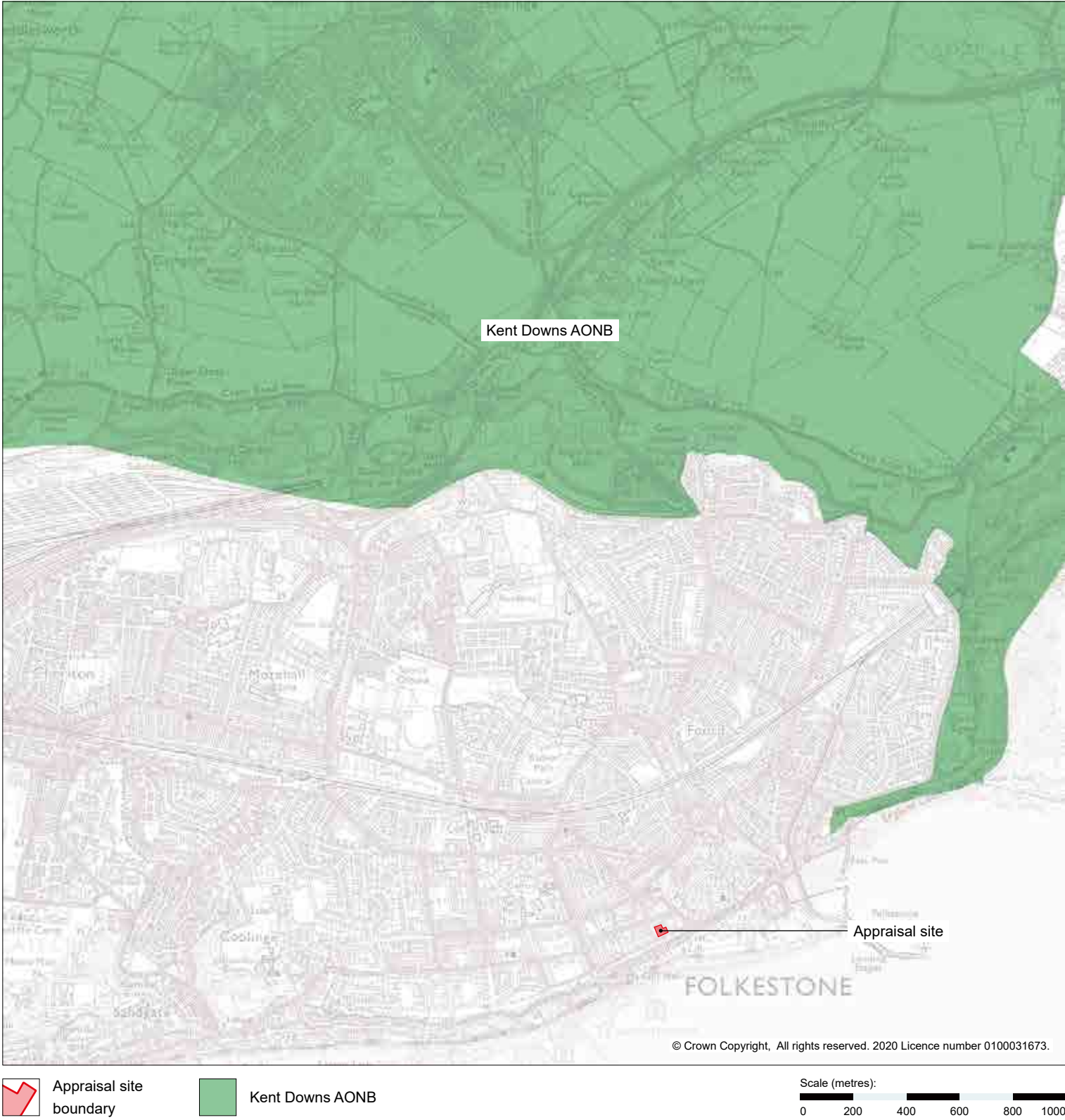
Fig. 18: Ordnance Survey map indicating topographical features.



LANDSCAPE DESIGNATIONS

- 4.14 The location of the Kent Downs AONB relative to the appraisal site is shown opposite. The urban area of Folkestone is not included within this national designation, but potential impacts of development on the setting of AONB is a material planning consideration.
- 4.15 Although the site is for the most part a considerable distance away from the southern boundary of the AONB (2km and more), there is a 'hook' of designated landscape that wraps around the eastern edge of the town towards the harbour. There is no intervisibility between the appraisal site and this part of the designated landscape due to the nature of the topography and the presence of intervening buildings.
- 4.16 Whilst the proposed changes to the site brought about by the construction of a new building will not affect the special character of the AONB, or its setting, there are locations on the North Downs escarpment, within the AONB, from where spectacular view over the town of Folkestone can be gained.
- 4.17 In these views the general urban form is apparent, and a number of individual buildings can be identified often in profile against the backdrop of the Channel. These views are addressed in the visual assessment part of this appraisal.

Fig. 21: Wider Ordnance Survey map indicating extent of Kent Downs Area of Outstanding Natural Beauty



LAND USE AND VEGETATION

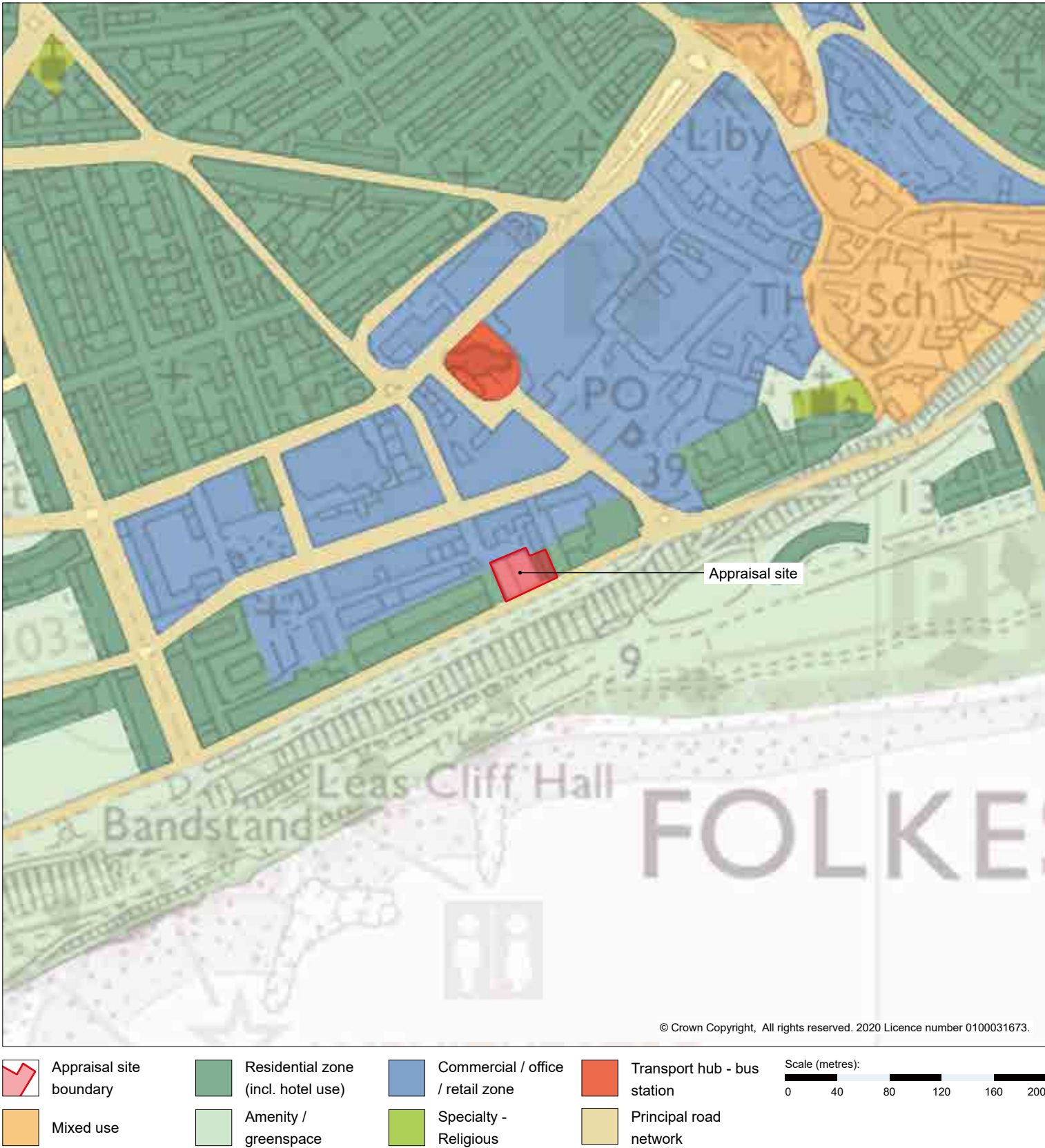
Land use

- 4.18 The key land use zones of the study area have been mapped using aerial photography, and broad land use categories are shown in **Fig. 22**.
- 4.19 There is a rich mix of land use / land cover types present within the study area, including:
- Residential - from large, elegant Victorian crescents, terraces and villas to modern apartments
 - Offices - residential conversions and new-build
 - Retail - traditional high street format such as Sandgate Rd interspersed with large single unit stores such as Sainsbury's
 - The Old Town - a dense mix of retail, community, residential, service, office and commercial uses.
 - Leisure and entertainment - hotels, Leas Cliff Hall
 - Leisure - esplanade, gardens, walks, beach and play
 - Road infrastructure, vehicular and pedestrian
 - Harbour and associated commercial activity

Vegetation

- 4.20 There is little vegetation on the site or in the immediate vicinity, other than some sporadic street trees (probably self-seeded) either side of Longford Way to the north of the site, a single maple tree and hedgerow outside the conveniences on Cheriton Place, and an intermittent 'avenue' of trees along Pleydell Gardens. At the western end of Pleydell Gardens, approaching Shakespeare Terrace there is a more substantial line of trees, but there is little intervisibility between these and the site so their contribution to the character of the Leas Pavilion area is limited.
- 4.21 Most vegetation interest is concentrated along the Leas Cliff and esplanade itself. The Leas is characterised by a broad strip of amenity grass which is consistent in width from the Step Short Memorial Arch as far as the Leas Cliff Hall, measuring approx 11m width outside the Leas Pavilion. It is devoid of any planting (other than grass) virtually for its entire length between the memorial arch and the Cliff Hall, with the exception of three bedding display beds just to the east of the hall entrance. This simple grass strip represents a distinctive and visually unifying element to The Leas, separating the vehicular route from the pedestrian esplanade, and providing a foreground setting to the terraces of buildings that line its northern side.
- 4.22 West of the Leas Cliff Hall the strip broadens and become more variable in width. Part of it has been given over to a sensory garden. In contrast with the highly maintained lawns, the trees and shrubs growing on the Leas cliff-face project above the level of the esplanade in places. Much is self-seeded, including sycamore, but there are specimens of pine presenting a distinctive and attractive profile in views along the esplanade.
- 4.23 Much of the vegetation on the cliff face is maintained below the level of the esplanade to maintain views of the sea. The lower, less steep sections of the cliff are more 'designed' and managed, particularly to the west, where the Lower Leas Coastal Park extends for over 1.2km, with Lower Sandgate Road as its spine. This is a highly attractive linear park which is popular with residents and tourists, supporting a wide range of native and non-native coastal plants.
- 4.24 There are no Tree Preservation Orders in the vicinity of the appraisal site. The greatest concentration of trees protected by TPO are along Castle Hill Avenue, to the west of the site.

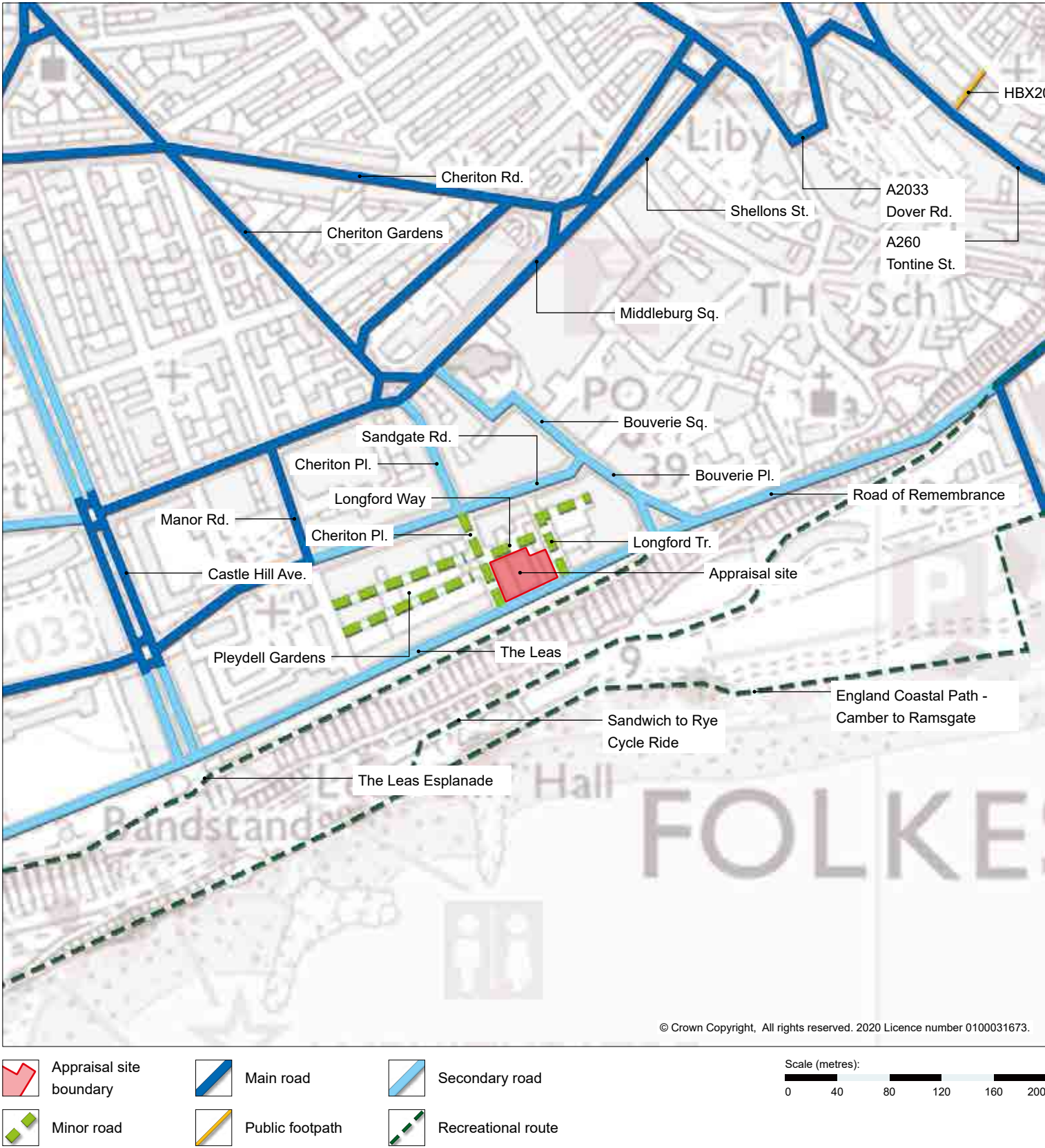
Fig. 22: Ordnance Survey map indicating surrounding land use / land cover.



PUBLIC HIGHWAY AND PUBLIC RIGHTS OF WAY NETWORK

- 4.25 The hierarchy of public roads and routes is shown opposite. The organic street pattern of the Old Town contrasts with the modern late 19th century planned grid of western Folkestone.
- 4.26 The appraisal site is surrounded by mainly quiet, secondary urban streets, set out in orthogonal fashion relative to the coast.
- 4.27 The main pedestrian and recreation routes also follow the coastline at the top of the cliff (The Leas) and at the bottom (Lower Sandgate Rd), with some additional paths running along the cliff. There are also paths that connect the two levels, zig-zagging through the often dense vegetation. The Leas Lift is not operating and is awaiting repair.
- 4.28 The flat pedestrian esplanade along The Leas above the cliff, is accessible for those with impaired mobility. The coastal path and park are also accessible for this group, but the cliff itself presents a challenge in getting from one to the other, especially since the closure of the Leas Lift in early 2017.
- 4.29 The coastal path and Sandwich to Rye cyclepath are popular routes.
- 4.30 There is only one short stretch of public footpath within this part of Folkestone - HBX20, located approximately 450m north east of the site.
- 4.31 The townscape in the vicinity of the appraisal site is therefore highly permeable. The site itself less so, with the Leas Pavilion closed and not accessible, and the two privately run car parks either side accessible for paid parking only.

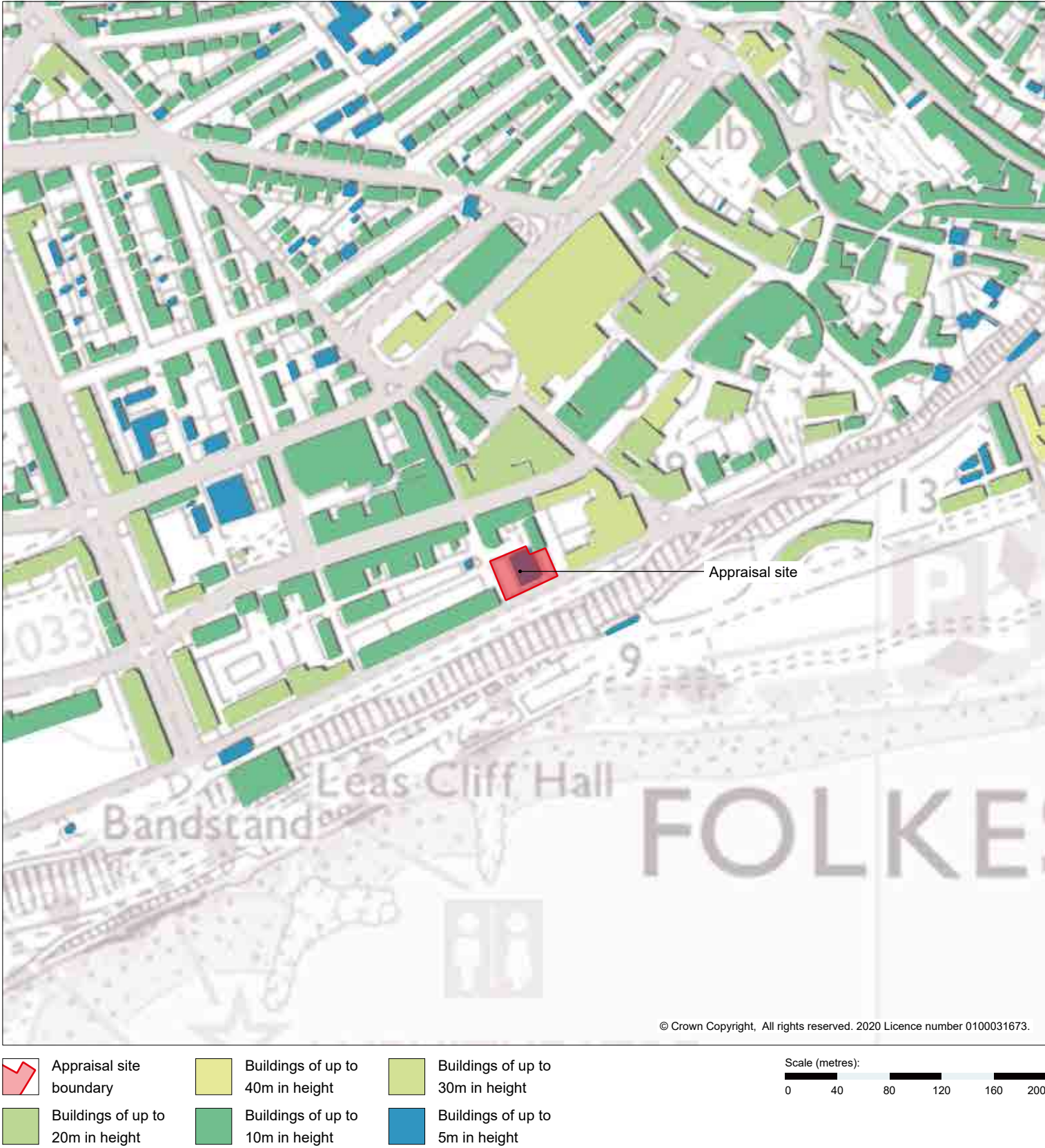
Fig. 23: Ordnance Survey map indicating surrounding Public Rights of Way and Public Highways



URBAN GRAIN AND BUILDING HEIGHTS

- 4.32 Mapping of urban grain and building heights is indicated in **Fig. 24**.
- 4.33 Building height information is derived from 'Building Heights in England' by Emu Analytics. The height categories are broad so the diagram should be treated with some caution. Nevertheless the data does provide a general indication of the physical properties and grain of development in this part of Folkestone.
- 4.34 In terms of urban grain, there are clear contrasts between the organic pattern of the Old Town (top right of the image), and the large footprint commercial and retail units immediately to the west.
- 4.35 In the left (west) of the image urban grain and settlement pattern becomes for more organised and geometric, representing the westward expansion of the town in the latter part of the 19th century, after the arrival of the railways, indicating a period of planned and designed development.
- 4.36 Here the urban pattern forms a grid, with long terraces running parallel to the coast, or at right angles to it. Further to the west (outside the frame of the image), the grid is retained on a large scale, but within it are residential crescents and extensive green spaces (Augusta Gardens, Clifton Crescent, Trinity Crescent).
- 4.37 In the north western sector of the image, the strong linear pattern is evident in the residential streets of Manor Rd, Christchurch Rd and Ingles Rd, but the pattern is more finely-grained, with shorter terraces and pairs of large villas, as well as modern infill plots.
- 4.38 The broad categorisation of building heights shows a general pattern of:
- Tallest buildings (light green) concentrated around the retail and commercial core (Bouverie Place, Bouverie Sq, Middelburg Sq), the tallest of which being No. 1 The Leas.
 - A zone of intermediate height buildings to the east of the commercial zone, including the Old Town, and to the west, including a section of Sandgate Rd.
 - Building heights increasing again along Langthorne Gardens / Clifton Gardens.
 - Lower buildings between these two zones, including single storey automotive-related units along Bouverie Rd West and located within rear plots, often associated with car parking and forecourts.
 - The Leas Cliff Hall is an anomaly in terms of building height due to its cliffside position.

Fig. 24: Ordnance Survey map indicating Grain of Development and Building Heights



HISTORICAL CONTEXT

- 4.39 To understand townscape and visual context, it is important to place the site in its historical context. A separate heritage statement is submitted with the planning application. The following is a brief summary of the historical development of today's townscape in the west end of Folkestone, much of which is derived from the 2006 informal Conservation Area Assessment for the area (see below).

4.40 The Folkestone Conservation Area was designated in January 1972 and extended in 1975, 1985, 1988 and 2005. The site and immediate urban context are not yet covered by a formal Conservation Area Appraisal. Folkestone and Hythe Council (previously Shepway District Council), in conjunction with Conservation Architecture & Planning Ltd have produced an informal appraisal document (2006) which contains useful contextual information relating to the historic development of the key townscape features of Folkestone, including The Leas and the West of Folkestone. Elements of this study relating to the historical development of Folkestone are included below, together with some supplementary documentation.

4.41. *'Folkestone is an ancient town in origin, which expanded over many centuries, eventually developing into a fashionable resort, with grand houses and facilities, and later a popular seaside resort. It was greatly helped in the 19th century by the building of a direct rail link to the harbour, pleasure seekers and serving cross Channel demand, now greatly declined as a result of the Channel Tunnel terminal outside the town. The major engineering achievements of the viaduct, Harbour Bridge, inner harbour and other structures are important both historically and technologically.'*

4.42. *The historic pattern and growth of development is evident in its layout and surviving buildings, many of which are listed or of special local interest. These include a collection of large stucco villas stretching westwards from the old core along the famed Leas promenade, a feature in its own right. The seafront location and dramatic topography of cliffs and hills, together with designed and managed natural landscapes greatly increases attractiveness and interest.*

4.43. *As a tourist attraction and pleasant place to live, Folkestone has considerable potential for continued conservation-led regeneration; including ensuring that redevelopment of the largely defunct seafront amusement area properly reflects its historic location. Major conservation works are called for on many fine buildings around the Old High Street, Tontine Street and the town centre fringe to the north, together with matching enhancement works to the public realm in these areas.'*
- 4.44 With regard to landscape setting, topography and geology, the Conservation Area Appraisal sets out the physical foundations of Folkestone through its complex geology, noting that the coast has always been liable to erosion by the sea, which greatly affected the settlement before the shoreline was consolidated when the harbour was built in the C19th.

4.45 The Conservation Area Appraisal summarises historic development and archaeology, referencing as far back as Neolithic period. It states that Roman Folkestone was only a point on the road between Dover (Portus Dubrae) and Lympe (Portus Lemanae), both important ports.

4.46 The Appraisal includes an early manor survey map of Folkestone dating from 1628 and a map of 1698 prepared within a year of Jacob des Bouverie acquiring the lordship of the manor of Folkestone in 1697. The town itself consisted of less than a dozen streets. *'The road from Hythe, a part of which was called Cow Street, later became Sandgate Road. Mercery Lane is today's Church Street while the Pent Stream played a larger part in the landscape than it does now.'*

4.47 An 1782 plan shows there had been considerable expansion over the intervening years. The town played a minor role in the Napoleonic Wars, with the construction of Martello Towers nearby and an improved harbour by Thomas Telford. Bathing machines had been introduced in an attempt to attract visitors, and for a while army officers and their families visited from camps at Hythe and Shorncliffe.

4.48 The Conservation Area Appraisal states that *'by the 1830s the town appears to have become a largely neglected and even squalid one. In 1841 the population was just 4,413, but the arrival of the railway would lead to rapid growth and to the impressive development of the harbour, which for a while became more important than Dover's.'*

4.49 The South Eastern Railway's main line from London to Dover, engineered by William Cubitt, reached Folkestone in June 1843, and by 1851 the population had nearly doubled from twenty years previous to 6,726 people. By 1881 this trend continued and the population grew to 18,986.

4.50 The railway company had acquired Telford's nearly derelict harbour, and arranged for a daily packet service to Boulogne, although the harbour was largely unsuitable for this role.

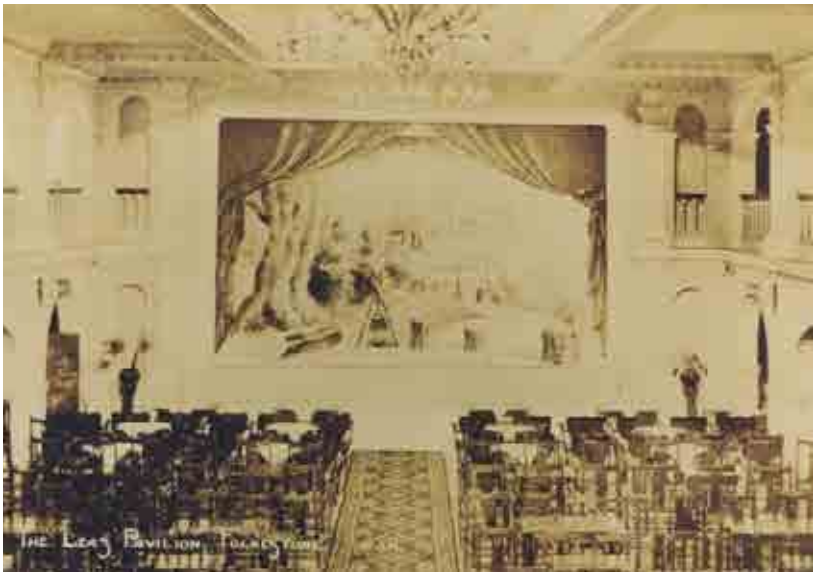
4.51 The steeply inclined Harbour Branch from the junction, gave freight and passenger access to the harbour, with an adjacent road named the Tram Road alongside. At the harbour the railway built the Pavilion (later Royal Pavilion) Hotel, In 1899 this was enlarged, using land formerly used for harbour offices, later becoming in the 1970s the site of the new Hotel Burstin.
- 4.52 Folkestone's expected expansion eastwards did not happen, and instead it grew to the west, where further stations were opened, including Cheriton Arch, opened in 1884, renamed Radnor Park two years later, and again as Folkestone Central in 1895.

4.53 A key factor in the expansion to the west was the decision of the Earl of Radnor to develop his Folkestone Estate, employing the architect Sidney Smirke, who designed the Gothic Revival Christ Church on Sandgate Road in 1851, of which only the tower now survives.

4.54 Development moved steadily westward, culminating in the grand, four storey stucco houses, either in terraces or in pairs of villas in places such as Clifton Crescent, Trinity Gardens and Trinity Crescent. This area was known as The Leas, previously Lees, meaning a tract of common land. The Leas became highly fashionable and by 1901 the western part of Folkestone was renowned as the most aristocratic seaside resort in the country.

4.55 At the end of the century two grand hotels were built at the western end of town, The Grand (1899-1903), and The Metropole of (1895-1897). Other attractions included the Victoria Pier, a switchback railway, baths and gardens, and water-balance lifts between the Leas and hotels and the shore. Radnor Park was opened in 1886, together with an exhibition hall.

4.56 In this spirit of fashion, leisure and entertainment, the Leas Pavilion was built, opening in 1902. This was in effect a tea room, with wicker armchairs and a ladies' string trio, set below the pavement level of the Leas, and surrounded by fashionable hotels.



4.57 The First World War saw large numbers of refugees arriving whilst the harbour was used as a prime military embarkation point. Between the wars Folkestone adjusted, becoming a resort that would appeal to middle-class families and not just the affluent.

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- 4.58 During World War Two the town was damaged by 77 air raids and six V1 attacks. Since 1945 growing affluence, cheap travel and the growth of the foreign holiday market saw significant decline in many UK holiday resorts, causing decay and vacancy in formerly fashionable and elegant buildings.
- 4.59 Outside the town centre Folkestone has undergone significant expansion in residential and light-industrial uses, accelerated by the construction of the M20, the Channel Tunnel and HS1.
- 4.60 Within the town centre, the relative lack of development, and natural absence of through traffic, means that the town has been able to retain many of its old buildings and streets, which still possess a distinctive and nostalgic charm.

LATE 19TH CENTURY MAPPING

- 4.61 The following four maps show western Folkestone during its period of expansion in the latter part of the 19th century, and subsequent consolidation in the early part of the 20th.
- 4.62 The first map shows Marine Crescent partially complete. To the west of the appraisal site there are pairs of substantial villas, but the western expansion of Folkestone extended only as far as a formative Castle Hill Avenue, and development progressing north along Manor Road. Clifton Gardens had been completed, but not Augusta Gardens to the north. The zig zag path is apparent, but no pier or Leas Lift yet.
- 4.63 Either side of the appraisal site, development is evident on both Longford Terrace and Cheriton Place.
- 4.64 By the time of the 1897 mapping the Victoria Pier and the lift have been constructed. A camera obscura has been created close to the bottom of the lift. Marine Crescent is complete, together with Marine Gardens. The bandstand has been constructed south of Clifton Gardens. The street pattern of much of Folkestone has crystallised, including the orthogonal street pattern west of Cheriton Gardens.
- 4.65 Between the 1897 and 1923 mapping there is little change, other than the infilling of the triangular plot of land between Cheriton Road and Cheriton Gardens, and the arrival of The Leas Pavilion.
- 4.66 On the last of the sequence of maps a number of seaside attractions are evident, especially to the south of the Marine Crescent, including bathing pool, rotunda and boating lake.
- 4.67 The Ordnance Survey map of 1907 shows the street pattern of Folkestone as very similar to what we see today.

Fig. 25: Historic Ordnance Survey Map. 1871-1890

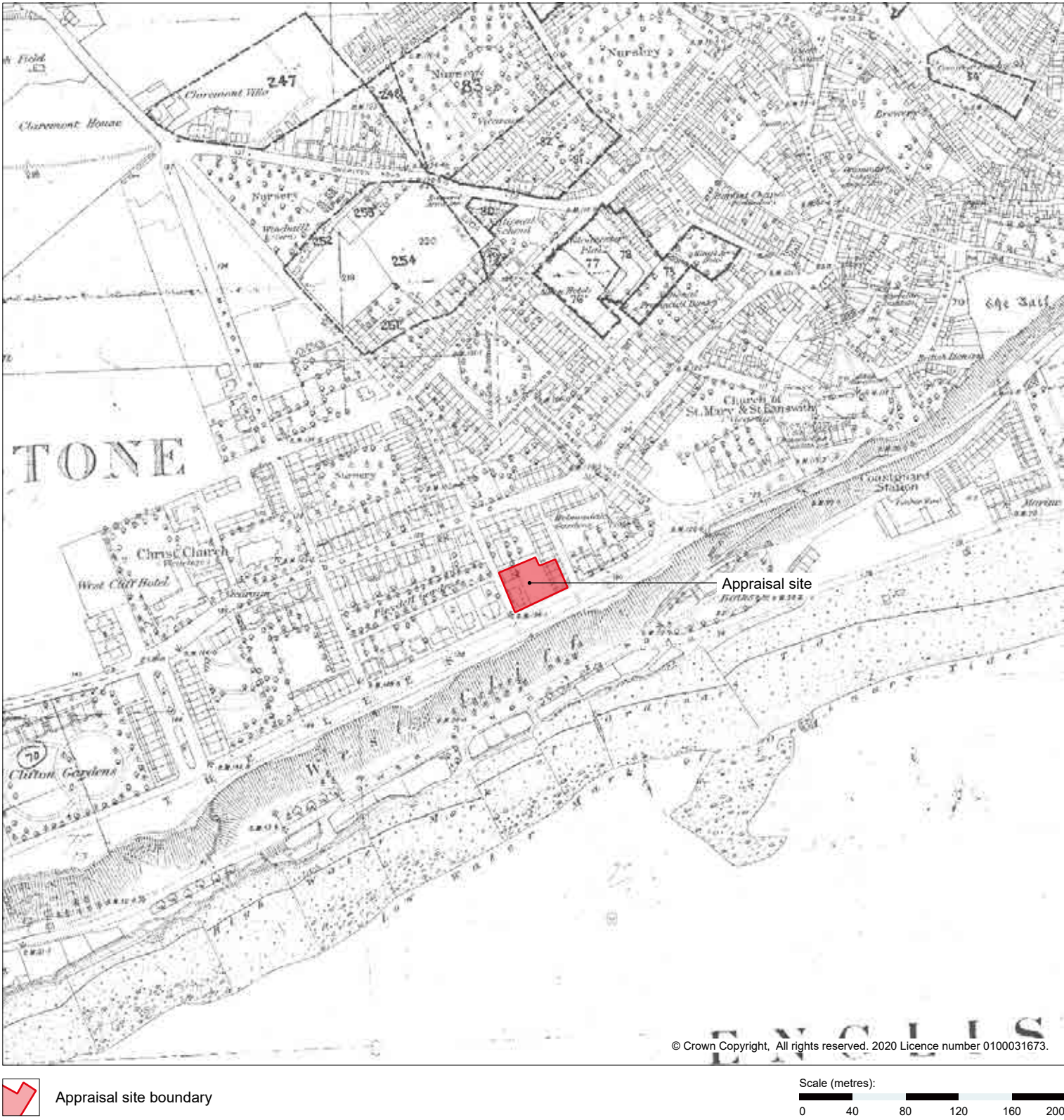


Fig. 26: Historic Ordnance Survey Map, 1897-1900



Fig. 27: Historic Ordnance Survey Map 1907-1923



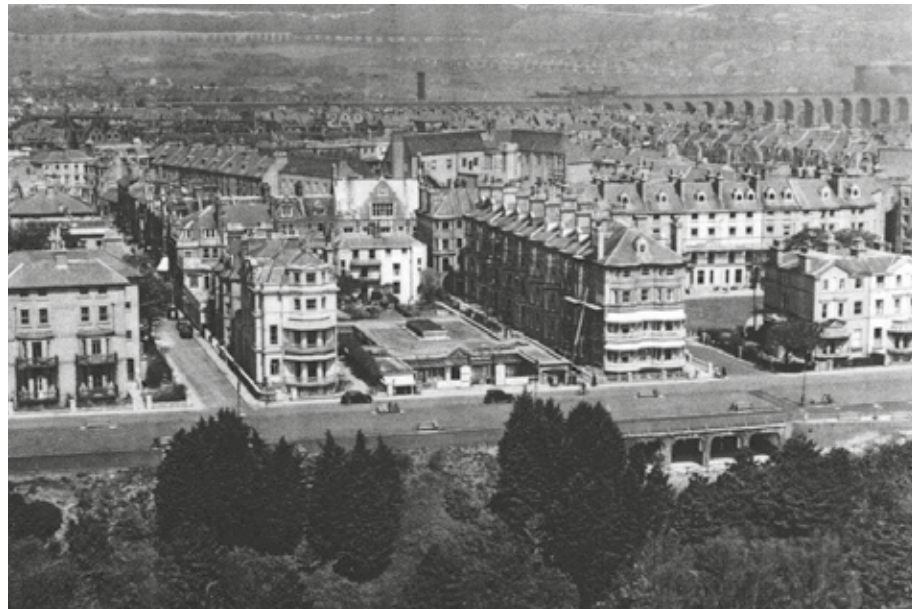
Fig. 28: Historic Ordnance Survey Map 1929-1952



BRIEF HISTORY OF THE LEAS PAVILION SITE

4.68 The linear open space of the Leas was originally flanked on its northern side by elegant, 4-5 storey pavilions and hotels/properties facing the sea.

Fig. 29: Aerial photograph of the Leas Pavilion prior to the demolition of buildings either side (reproduced from <https://www.leaspavilionarchive.org.uk/>, from the private collection of Alan Taylor)



4.69 Some of these remain, including the listed group of 16-19 the Leas and 22-26 the Leas. Some were replaced in the latter half of the 20th century. These include the 7 storey Carlton Leas, the dramatic and imposing No.1 The Leas (a former office building) and the 1970's 4 storey stepped and balconied residential developments of Priors Lees and Whitecliffs located immediately to the east and west of the appraisal site.

4.70 Although the addition of 20th century architecture has diluted the Victorian/Edwardian character of the area, the buildings, with the exception of No.1 the Leas, have generally retained a similar scale and arrangement to the original pattern of development.

Fig. 30: The Leas in 1907, viewing east.



4.71 Until 1902 the site of the Leas Pavilion was a garden surrounded by elegant houses and hotels. The Pavilion was built in 1902 on land which lay between two hotels leased from the Radnor Estate. Lease restrictions restricted building heights in order to maintain access to light.

4.72 The surrounding houses and hotels were 4 typically storeys with extra accommodation in the roof spaces. The Longford Hotel occupied the land to the east of the Pavilion, with another hotel located to the west.

4.73 Further west, the Southcliff Hotel was originally 5 townhouses in 1861, then becoming 2 hotels in the 1930's, finally joining to become a 68 bedroom Hotel in 1980.

4.74 The Leas Pavilion was opened originally as a tea room for the Edwardian aristocracy. Concert Parties were introduced in 1906 on a makeshift platform.

4.75 During WW1 farewell concerts were held at the Leas Pavilion for troops about to depart for the continent.

Fig. 31: Photograph of internal layout before it was a theatre (reproduced from <https://www.leaspavilionarchive.org.uk/>, from the private collection of Alan Taylor)



4.76 In 1928 a stage was built in the main hall and the Leas Pavilion was re-opened as The Leas Pavilion Theatre, which continued through to the 1980's.

Fig. 32: The Leas Pavilion (possibly 1985) (reproduced from <https://www.leaspavilionarchive.org.uk/>, from the private collection of Alan Taylor)



Fig. 33: Interior view of the Leas Pavilion looking to the rear of the auditorium (reproduced from <https://www.leaspavilionarchive.org.uk/>, from the private collection of Alan Taylor).



- 4.77 In 1984 the Leas Pavilion reopened as the Leas Club, a bar, cafe and venue for live music.
- 4.78 In 1994 the Longford Hotel on the eastern side of the Pavilion was destroyed by a fire. In the following year both the hotel and the building to the west of the site were demolished.

Fig. 34: The Leas, Longford Hotel and Leas Pavilion



- 4.79 From 1995 the two sites either side of the Pavilion were used as surface car parks with the frontages given over to landscaped gardens fronting onto the Leas. In 2005 planning permission was granted for the landscaped gardens adjacent to the Leas Club to be removed and for the car parks to be extended south to the back of pavement.
- 4.80 The Leas Club closed in 2008 and the Pavilion has been disused since.
- 4.81 In 2015 planning permission was granted by Shepway District Council (now Folkestone & Hythe) for apartments to be built on the car parks either side of the Leas Pavilion, and to bridge across the pavilion roof. Building work was never started on the project and the planning permission expired.

Heritage statement

- 4.82 A separate heritage statement relating to the Leas Pavilion has been produced by the Heritage Collective (April 2020), to inform the planning application. This summarises the significance of the Leas Pavilion building as follows:
- 'Overall, the grade II listed Leas Pavilion is an important Edwardian seaside building, which derives its significance from a combination of its historic and architectural values. It compares in interest with the later Leas Cliff Hall and Pulhamite Caves (both grade II listed) and has group value with the nearby grade II* Leas Lift part of which was designed by the same architect.'*
- 4.83 In the context of the Conservation Area Appraisal the Heritage Statement states:

'The site as an Edwardian tea room and important element of early 20th century recreational activity in Folkestone makes a strong positive contribution to the Folkestone Conservation Area, particularly the West End of Folkestone and The Leas Character Areas. Key views and vistas within the conservation area which take in the site include numerous important views from and along The Leas and the view from the beach looking back on the town above.'

- 4.84 In terms of nearby listed buildings, the Heritage Statement concludes that the nearby asset of most relevance, and most capable of being affected by the development, is the Grade II* Leas Lift. In terms of other nearby listed buildings it states:

'While there are other listed buildings nearby, the specifics of their location and way in which these assets are appreciated means that the proposed redevelopment of the Leas Pavilion would not affect their significance.'

- 4.85 The Heritage Statement concludes:

'Overall, the proposals amount to a high quality and carefully considered approach for the redevelopment and conversion of the listed building and wider site. The proposals are clearly informed by the significance of the listed building, conservation area and nearby assets and townscape.'

The proposals would secure the conservation of the listed building back, providing it with an active use that it is likely to be its optimum viable use. Proposals to provide new built form on the current flanking car parks are sensitively designed and bring about a number of heritage benefits, particularly with regards to the Folkestone Conservation Area.

While some aspects of the proposals may result in harm to the significance of the Leas Pavilion (commensurate with a medium level of less than substantial harm in NPPF terms), there are considerable heritage public benefits (in accordance with paragraph 020 of the PPG) which would weigh against this. Considered holistically, the proposals are found to preserve and enhance significance of the grade II Leas Pavilion and conservation area and result in minor enhancement to the significance of the nearby grade II listed Leas Lift through an enhancement of its group value with the pavilion. There are also considerable other public benefits not considered within this report which should weigh into any planning balance.*

In summary, the proposals presented to the Council are found to preserve and enhance the significance of the grade II listed Leas Pavilion and the Folkestone Conservation Area. In this respect the scheme would fall outside of the remit of paragraphs 194 to 196 of the NPPF and there would be preservation for the purposes of the duty maker's decision under Sections 16, 66 and 72 of the Planning (Listed Building and Conservation Areas) Act 1990.'

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Fig. 35: Longford Terrace and garden prior to the construction of the Leas Pavilion in 1902, viewing north (reproduced from <https://www.leaspavilionarchive.org.uk/>, from the private collection of Alan Taylor).



Fig. 36: Photograph taken from the pavement looking down at the frontage, tables, chairs and shops in the courtyard (reproduced from <https://www.leaspavilionarchive.org.uk/>, from the private collection of Alan Taylor).



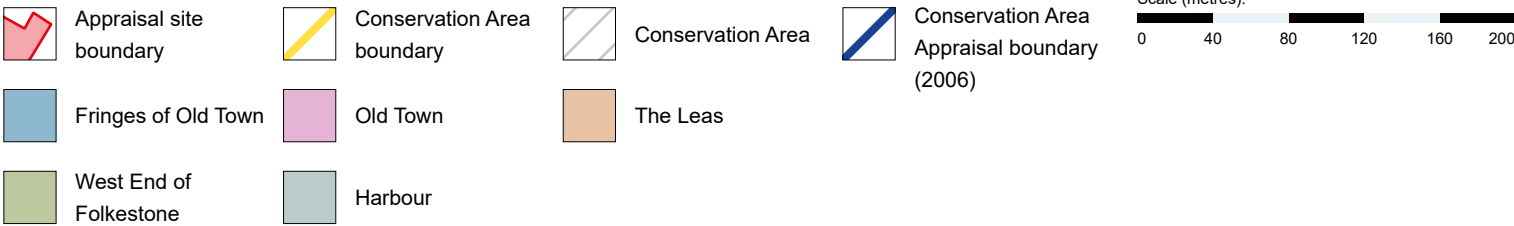
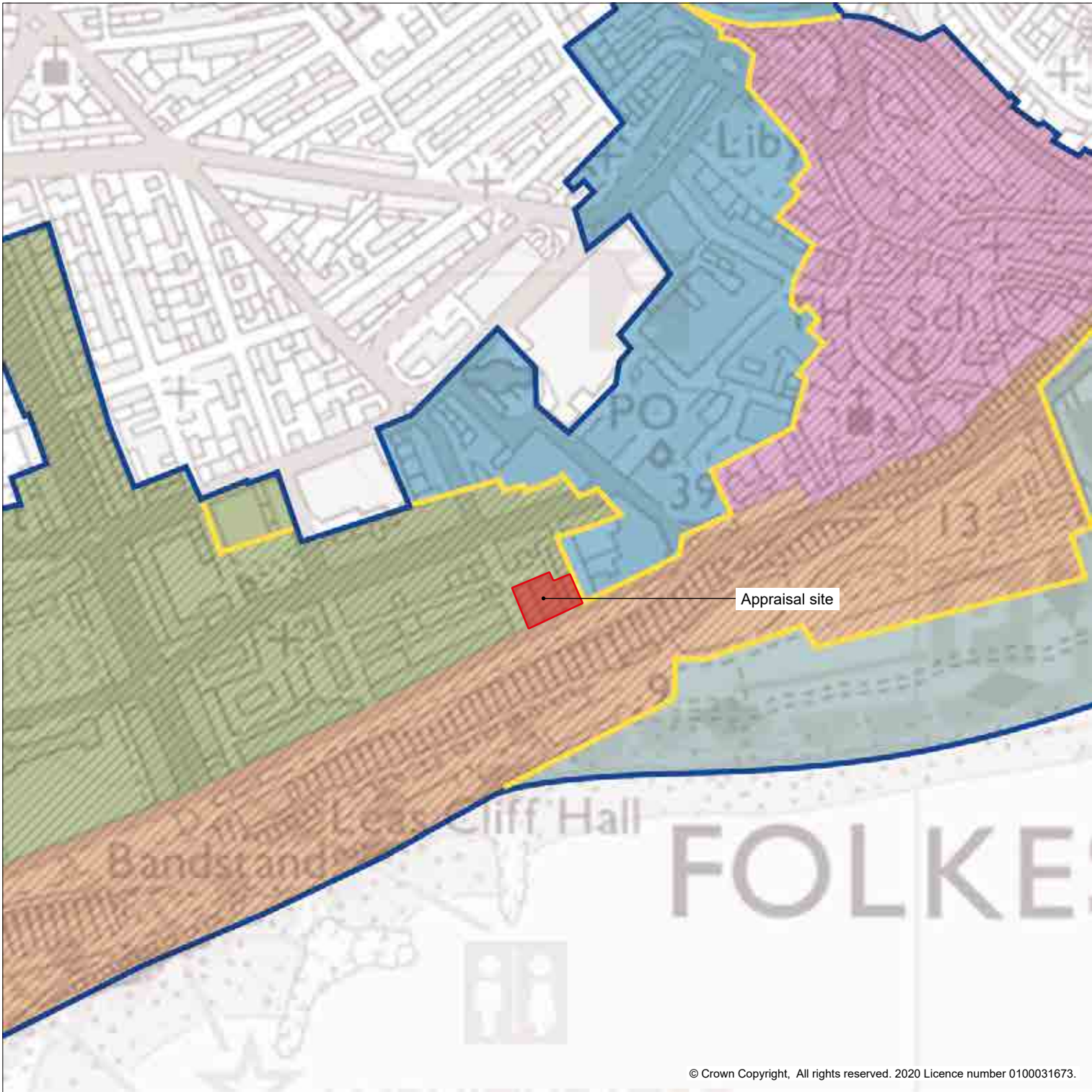
Fig. 37: The Leas Longford Hotel in 1970, viewing west along The Leas, with the tall 'book-end' buildings either side of the Leas Pavilion, prior to their demolition. Whitecliffs and Priors Leas either side of these.



TOWNSCAPE CHARACTER: FOLKESTONE CONSERVATION AREA APPRAISAL (CAA)

- 4.86 The Conservation Area Appraisal (2006) identifies five distinct character areas or zones:
- 1) The Leas and Seafront
 - 2) West End of Folkestone
 - 3) The Harbour
 - 4) Old Town
 - 5) Old Town Fringes
- 4.87 The Leas Pavilion site is located within Character Area 2 - 'West End of Folkestone,' and is adjacent to two other character areas; 1) The Leas and Seafront, and 5) Old Town Fringes.
- Character Area 2 - 'West End of Folkestone.'*
- 4.88 The CAA describes West Folkestone as '*very much the historic residential 'lung' of Folkestone and represents the most fashionable and desirable part of town to live in.*' It discusses prevailing or former uses and influences on plan form and building types within the character area, and assesses the architectural and historic qualities of buildings and their contribution.
- 4.89. '*West Folkestone, with its crescents and long avenues, represents C19th Folkestone at its most confident and magisterial in terms of town planning and reflects the power of the urban landlord of the time, the Earls of Radnor.*
- 4.90. '*The area, with its bold, urbane stucco architecture, picks up on national C19th architectural trends, so evident in other coastal towns like Brighton, Hastings or St Leonard's, as opposed to the Old Town, which is more about an indigenous architecture.*'
- 4.91 The study identifies key streets, crescents and individual buildings that contribute to the character of the West End of Folkestone, although the Leas Pavilion is not specifically referenced.
- 4.92 With regard to local details, prevalent local/traditional materials and public realm, the CAA describes how mid-Victorian Folkestone (the grand villas of the Clifton Crescent area) is dominated by exuberant stucco architecture which is made more impressive by the near uniformity of finish and white or cream colour. Elsewhere in the character area there are similarly spectacular uses of materials, such as polychromatic brickwork, dressed sandstone, mock-Tudor and pebbledash. The Leas Pavilion is referenced with regard to use of terracotta:
- 'Terracotta and red brick becomes particularly prevalent, as can be seen at The Grand (1899-1903); The Metropole (1895-7); and the subterranean former Leas Pavilion tearooms (1902), which is purely terracotta - this part of town is rich in late 19th century terracotta work.'*

Fig. 38: Ordnance Survey map indicating Conservation Character Areas



4.93 With regard to landscape, green spaces and ecology/biodiversity value, the CAA notes that with the planned 19th century layout providing generally small gardens, *'streets and squares become the places most displays of trees and greenery take place, to the communal rather than private enjoyment. Thus, where there is comparatively less biodiversity than might be found in many suburban locations, it is compensated by a variety of grand public spaces and treed vistas. Any erosion of these characteristics would be a degradation of the intended plan and present significance of the area.'*

4.94 The CAA places the Leas Pavilion within its 'Neutral Areas' category, stating: *'The area around the Leas Club is rather a mess, with conflicting superficial accumulations. More could be done to enunciate the fine terracotta architecture of the Club itself.'*

Character Area 1 - The Leas and Seafront

4.95 Although the appraisal site is within the West End of Folkestone character area, its southern boundary is immediately adjacent to The Leas and Seafront character area. The CAA describes this character area as *'Folkestone's grand recreational promenade. The Leas is a wonderful open space with dramatic views along it and out to sea, over a drop of more than 40 metres down to the beach'* Its shape is defined by the linear beach front. The Leas includes the gardens on the cliff top as well as the road that runs along the top. This part of the CA owes its character to the coastline topography; the sea; the beach; the steep cliff face and the panoramic views down towards the beach and out to sea.

4.96 The CAA provides a schedule of the listed buildings associated with this character area, which includes the Southcliffe Hotel and the Leas Lift, both in close proximity to the appraisal site. It also makes reference to the contribution made by the Victorian lamp posts to the character of the Leas.

4.97 With regard to public realm; *'The key features are the high landscape quality, both of The Leas and the gardens of the slope down to the seafront. However, much of the latter is poorly maintained and in need of repair, especially the paths and railings.'*

4.98 Negative elements identified by the CAA include the following:

- Multiple signage to the Leas Club;
- Tall building at start of The Leas;
- Foreground projecting element to tall building

4.99 The tall building referred to is presumably No.1 The Leas, and the projecting element, its tower.

Character Area 5 - Old Town Fringes

4.100 The appraisal site is also immediately to the west of the Old Town Fringes character area. No.1 The Leas is located between the appraisal site and the remainder of this character area.

4.101 While the eastern edge of this character area adjoins the Old Town, the western fringe *'interfaces in part with development of a larger scale and alien character. This includes a major development site, a supermarket and the Middleburg Square area of large office blocks.'*

4.102 *'Compared to the other four character areas, Old Town Fringes is perhaps the least individually cohesive in that it is locked into the middle of Folkestone and perhaps takes its developmental cues from the adjacent areas.'*

4.103 The CAA does make specific reference to No.1 The Leas in the context of this character area: *'The emphatically Modernist No 1 The Leas is architecturally bold and daring but probably in the wrong location in relation to the characteristic buildings of the CA which it dominates excessively. It works slightly better when seen from the beach looking upwards, but should not be seen as a successful precedent for further tall buildings at any location within the CA or its visual buffer zone.'*

4.104 So although the appraisal site shares a boundary with this character area, its characteristics are far more strongly aligned with the West End of Folkestone and The Leas and Seafront character areas, than with the Old Town Fringes.

Spatial and architectural character:

- 4.105 The Conservation Area Appraisal states that there are at least three strains to Folkestone's spatial and architectural character:
- The picturesque, village like quality of The Old High Street/ Bayle/Church Street area of the town centre, with its winding streets and emphasis on the individuality of buildings.
 - The more urbane stucco architecture of The Leas, Clifton Crescent and Sandgate Road; this fits into a national trend of C19th architecture: Brighton, Hastings, Cheltenham and so on.
 - The late C19th residential areas, such as Grimston Avenue/ Gardens, Sandgate Road, Earl's Avenue, with its different palette of building materials (i.e. dressed stone, as opposed to stucco) and polychrome brick colours.

4.106 The Leas Pavilion does not quite fall into any of these strains, underlining its uniqueness in the townscape. The Conservation Area Appraisal stresses the diversity and complexity of spaces in the town. *'These are framed either by the natural features of sea and cliff on the one hand and, on the other, by mainly medium rise building forms, apartments or commercial, and, in Folkestone West, a mix of low rise houses, the larger ones converted to apartments.'*

4.107 It describes the broadest, most open and dramatic spaces being, unsurprisingly, along the seafront. These contrast with the organic, narrow streets of the Old Town and The Bayle. North and west of these, the layout is largely that of a planned development on a generous scale. Many residential streets are furnished with trees. Numerous large, communal open spaces characterise Folkestone West.

Key views and vistas

4.108 The Conservation Area Appraisal identifies key views and vistas in relation to the Conservation Area.:

- All views from or along The Leas.
- The view from the beach looking back on the town above.
- The view towards Holy Trinity Church from Bouverie Road West.
- The view up Sandgate Road from Guildhall Street, and vice versa, looking towards the Old Town Hall (now Waterstone's).
- Up and down The Old High Street.
- Looking up towards, from Harbour Street, The Eagle, No 1 The Parade, with its extraordinary tower, with lookout.
- The view into Clifton Gardens from The Leas.
- Castle Hill Avenue is a major artery through the historic residential part of Folkestone, as is Earl's Avenue, which runs parallel to it.
- The views looking out from The Leas towards the Harbour and the White Cliffs to the east, and the panoramic views over Sandgate and Hythe Bay to Dungeness to the west.
- From the Harbour Arm to the Warren and White Cliffs.
- From the East Cliff looking down on the Harbour and towards Dover.
- The panoramic view of Folkestone from Crete Roads East and West.
- Augusta Gardens front crescent and the gardens themselves.
- The view across Westbourne Gardens and the vista and tree-lined central path up Castle Hill Avenue.

5498-LLB-RP-L-0001-S4-P02 | TOWNSCAPE & VISUAL APPRAISAL
THE LEAS PAVILION, THE LEAS, FOLKESTONE

PLANNING

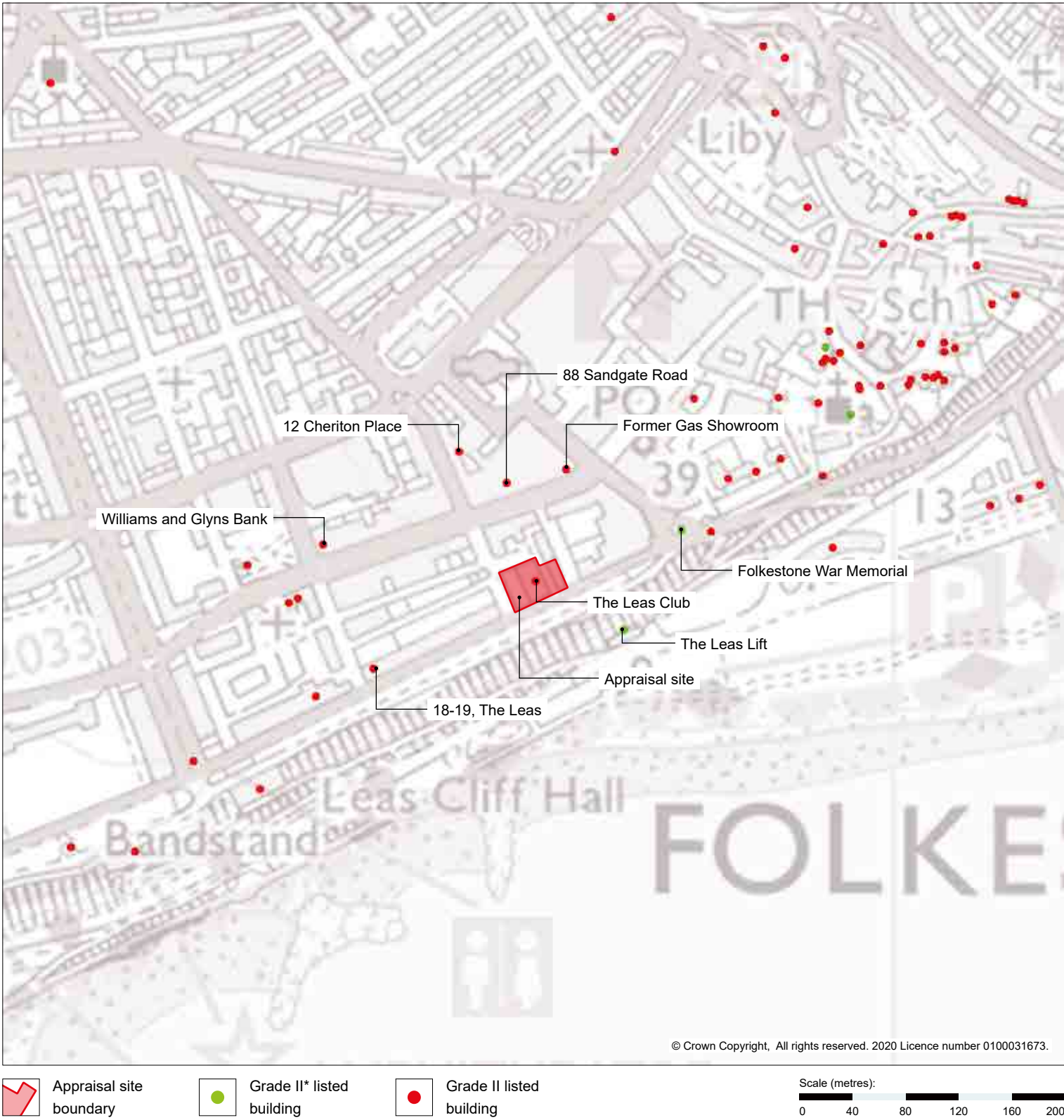
- Picturesque view from the harbour across to Martello Tower No 3.
 - View and setting coming into the CA from the Central Railway Station, greatly improved by Kingsnorth Gardens and trees around and in the Wyevale Garden Centre.
- 4.109 Of these, the keys views with regard to the current proposals for the Leas Pavilion site are:
- All views from or along The Leas.
 - The view from the beach looking back on the town above.
 - The panoramic view of Folkestone from Crete Roads East and West.
- 4.110 These views, and additional views, are assessed in the visual assessment part of this appraisal.

HISTORIC DESIGNATIONS

Listed Buildings

- 4.111 The site is located within the Folkestone Conservation Area designated in Jan 1972 (see above).
- 4.112 Listed Buildings in the vicinity of the appraisal site are shown in **Fig. 39**.
- 4.113 A Listed Building or Listed Structure is one that has been placed by Historic England on the statutory list in England. A listed building may not be demolished, extended, or altered without permission from the local planning authority.
- 4.114 The grade of a Listed Building is an indication of its special interest in a national context. Scheduled Monuments are not graded, but Listed Buildings and Registered Landscapes are:
- I: the building is of exceptional interest.
 - II*: the building is of particular importance, and is of more than special interest.
 - II: the building is of special interest.
- 4.115 The number and categories of Listed Buildings within a 200m radius are as follows:
- Grade I: 0
 - Grade II*: 2
 - The Leas Lift.
 - Folkestone War Memorial.
 - Grade II: 13
- 4.116 The following listed buildings are closest to the site:
- Grade II*: 2
 - The Leas Lift, located approximately 70m to the south-east of the appraisal site
 - Folkestone War Memorial, located approximately 145m to the north-east of the appraisal site.
 - Grade II: 4
 - The Leas Club (Pavilion), located at the centre of the appraisal site.
 - 88 Sandgate Road, located approximately 98m to the north of the appraisal site.
 - Former Gas Showroom, located approximately 110m to the north of the appraisal site.
 - 18-19 The Leas, located approximately 136m to the south-west of the appraisal site.
- 4.117 The April 2020 Heritage Statement by the Heritage Collective, identified the Leas Lift as being the only other listed building to be within the setting of the Leas Pavilion site, and concluded that *'Considered holistically, the proposals are found to preserve and enhance significance of the grade II Leas Pavilion and conservation area and result in minor enhancement to the significance of the nearby grade II* listed Leas Lift through an enhancement of its group value with the pavilion.'*

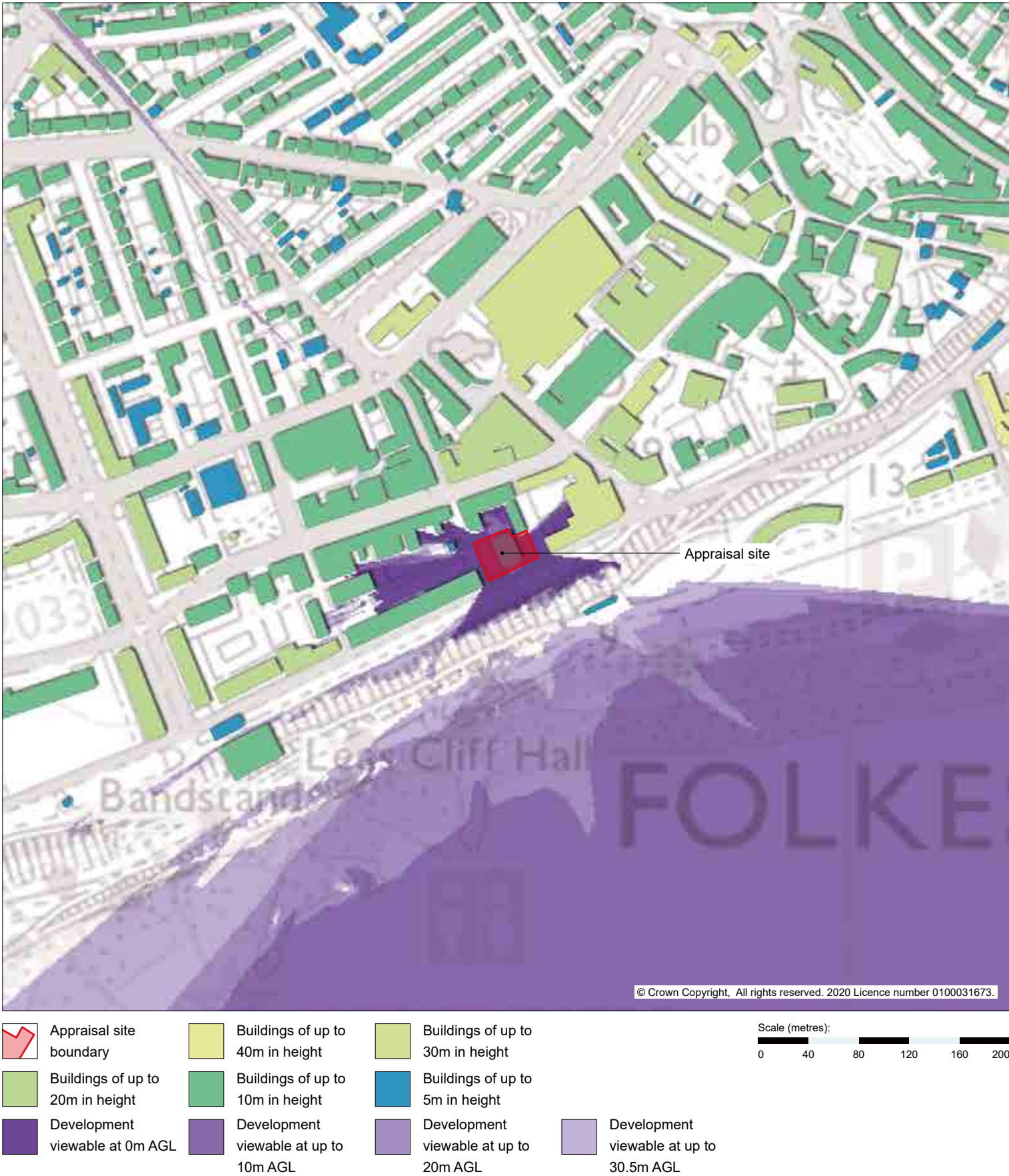
Fig. 39: Ordnance Survey map indicating locations of Listed Buildings



ZONE OF THEORETICAL VISIBILITY (ZTV)

- 4.118 The Zone of Theoretical Visibility (ZTV) diagram has been produced using Global Mapper computer software and is based upon standard 5m OS Terrain Data.
- 4.119 The ZTV is intended to provide an initial broad-based assessment of the likely visibility shed of the proposal site, to establish potential locations from where views of the proposed building might be gained.
- 4.120 The ZTV provides an image of the areas from where potential views may occur, and is not intended as an accurate representation of all areas from where views will be gained. The ZTV diagram takes into consideration the screening effect of landform and surrounding areas of development and does not take into account localised variations in landform, the presence of intervening vegetation cover, or other smaller built structures such as walls or fences that could further affect visibility.
- 4.121 The diagram also takes into consideration the following parameters:
- All buildings within the study area given categorised (not precise) heights as derived from 'Building Heights in England' by Emu Analytics.
 - Transmitter heights of 0, 10, 20 and 30.5m above existing ground level located at a position within approximate centre of the proposal site, are intended to broadly represent the proposed development. The building itself is at 31.35m, rising to 31.95m at the top of the lift shafts.
 - Receptor viewing height of 1.63m above ground level.
- 4.122 The diagram indicates that the proposed building has a very restricted visual envelope to the west, north and east, because of the presence of surrounding buildings. The visual envelope extends into Pleydell Gardens, but there are trees along here which filter the view.
- 4.123 As the diagram is site-centred the splay of the visual cone along The Leas would be wider than shown. In addition, the generated diagram does not pick up the two channelled views from the north shown in the visual appraisal section of this report, namely from Cheriton Place, north of Sandgate Road, and from Sandgate Road itself, through the pedestrian link to Longford Terrace.
- 4.124 Predictably the longest views are to the south. The 'blind zone' below the cliff edge is evident in this diagram.
- 4.125 The diagram also fails to pick up the potential long-distance views from the North Downs escarpment, identified in the visual appraisal section of the report. In these views the profile of No.1 The Leas is discernible, together with the Metropole and Grand hotels, so it follows that the proposed development on the Leas Pavilion site would also be visible.

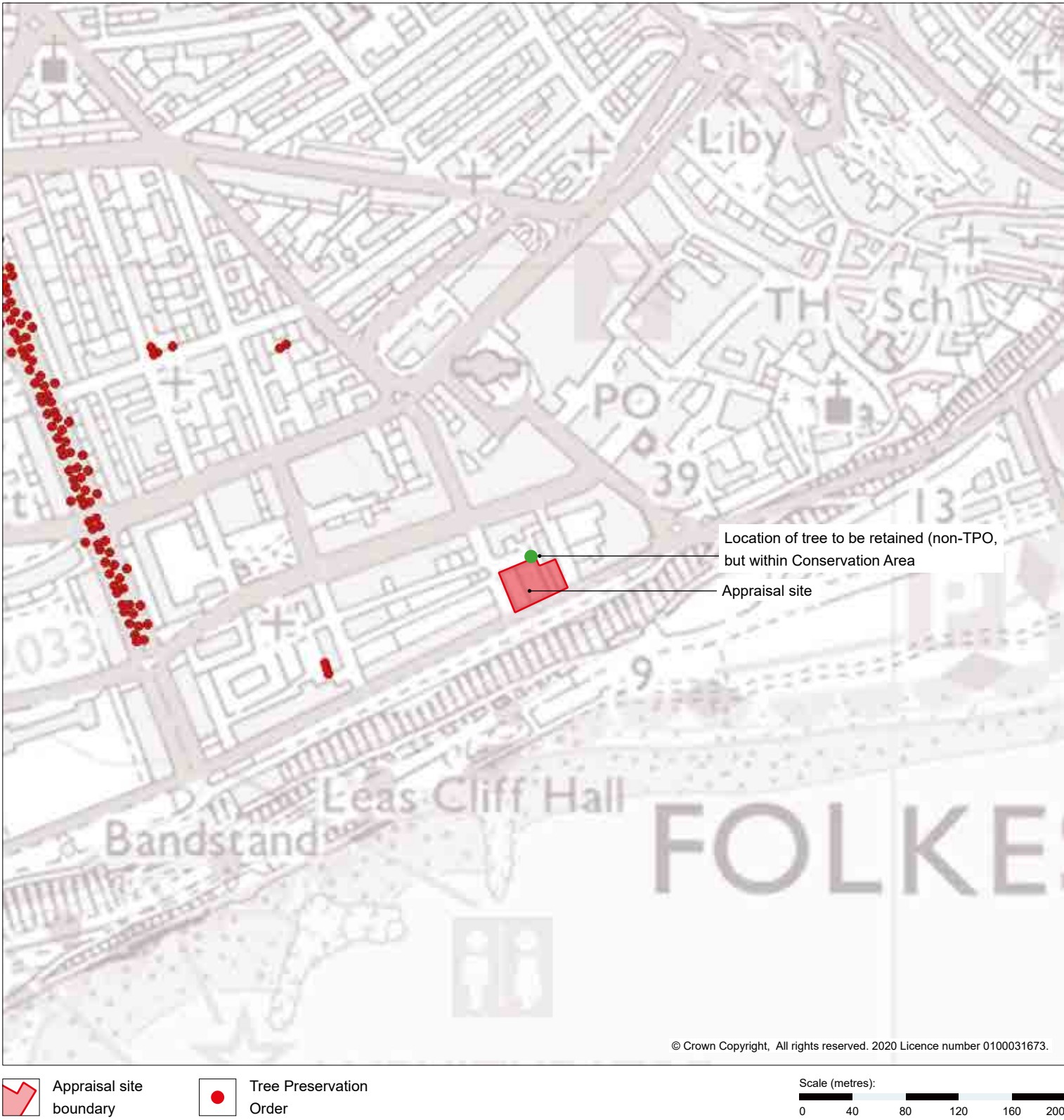
Fig. 40: Ordnance Survey map indicating the Zone of Theoretical View



TREE PRESERVATION ORDERS

- 4.126 There are no Tree Preservation Orders in the immediate vicinity of the appraisal site. The nearest significant concentration of trees that are protected by TPO are located on Castle Hill Avenue.
- 4.127 There is a single maple tree which is off-site and located close to the northern boundary of the appraisal site. This is not protected by TPO but is within the conservation area. This tree is proposed to be retained.
- 4.128 Another maple of some townscape merit, again not protected by TPO but within the conservation area, is located within the garden curtilage of the Public Conveniences on Cheriton Place. This will be unaffected by the development proposal.

Fig. 41: Ordnance Survey map indicating locations of Tree Preservation Orders



5. NATIONAL AND LOCAL POLICY CONTEXT

NATIONAL PLANNING POLICY

5.1 The National Planning Policy Framework (February 2019) sets out the Government's planning policies for England and how these should be applied. It provides a framework within which locally-prepared plans for housing and other development can be produced. The NPPF incorporates the Government's national guidance and policy for the creation of high quality buildings and places, and for development in the historic environment. It includes a policy framework for local planning authorities and decision takers.

Achieving well-designed places.

5.2 Paragraphs 124 to 132 are devoted to policy aimed at achieving well-designed places.

5.3 Para 127 states: *'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.'

5.4 Para 131 states:

5.5 *'In determining applications, great weight should be given to 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.'*

The Historic Environment

5.6 Paragraph 189 of the NPPF places a duty on the Local Planning Authority to require an applicant to describe the significance of any heritage assets affected by a proposal, providing a proportionate level of detail. Paragraph 190 notes that local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset). They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal.

5.7 Paragraph 193 applies specifically to designated heritage assets, and states that great weight should be given to their conservation irrespective of whether any potential harm amounts to substantial or less than substantial harm.

5.8 Paragraphs 194 to 196 describe two levels of potential harm to the significance of designated heritage assets; substantial harm and less than substantial harm. These are to be weighed in the planning balance according to the guidance set out within the NPPF. Substantial harm to or loss of a grade II listed building should be exceptional. Substantial harm to or loss of designated heritage assets of the highest significance, including grade I and II* listed buildings should be wholly exceptional

5.9 Paragraph 196 deals with cases of less than substantial harm and notes that any such harm should be weighed against the public benefits of the proposal. Heritage protection and the conservation of heritage assets are recognised as of benefit to the public.

5.10 Para 200 states that Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.

LOCAL PLAN POLICY

Local Plan Policy Folkestone & Hythe District Council

Shepway District Local Plan Review – Adopted March 2006

Building design, layout and special needs access

5.11 POLICY BE1 A high standard of layout, design and choice of materials will be expected for all new development. Materials should be sympathetic to those predominating locally in type, colour and texture. Development should accord with existing development in the locality, where the site and surrounding development are physically and visually interrelated in respect of building form, mass, height, and elevational details.

5.12 Planning applications for development with an element of public use will be assessed as to their provision for access for disabled persons in respect of site layout and the relationship between buildings and their car parking areas and other public access points.

5.13 Development proposals must demonstrate that account is taken of opportunities to reduce the incidence of crime and the fear of crime against both property and the person.

5.14 For large, complex or sensitive sites, a design statement will be required containing:

1. An appraisal of the site and its context
2. Identification of constraints and opportunities
3. Design objectives and options
4. Consideration of local landscape character and distinctiveness
5. An explanation of the rationale behind siting, massing and proposed elevation and spatial treatments

Conservation areas

- POLICY BE4 The District Planning Authority will:
 - a. refuse Conservation Area Consent for the demolition of buildings which contribute to the character or appearance of a Conservation Area;
 - b. refuse proposals for infill or backland development which would adversely affect the character of a Conservation Area;
 - c. require the height, scale, form and materials of new development, including alterations or extensions to existing buildings, to respect the character of Conservation Areas;

- d. seek to retain materials, features and details of unlisted buildings or structures which preserve or enhance the character or appearance of Conservation Areas;
- e. seek to retain the historic patterns, plot boundaries, building lines, open spaces, footways, footpaths and kerblines which are essential to the character or appearance of Conservation areas;
- f. protect trees, verges and hedgerows which enhance both the setting and character of Conservation Areas.
- The District Planning Authority will consider introducing Article 4(1) and 4(2) Directions subject to any necessary confirmation to control alterations which would otherwise be permitted development, where these would be detrimental to the appearance and character of Conservation Areas. Proposals to preserve or enhance the character or appearance of Conservation Areas, including the removal of buildings, structures, and features which detract from those Areas, will be encouraged.

Listed buildings

- POLICY BE5 In order to preserve listed buildings and their settings and any features of special architectural or historic interest which they possess, the District Planning Authority will:
 - a. refuse Listed Building Consent for demolition, extension, alteration or partial demolition, including internal or external works, if the proposals are considered to be detrimental to the character of the building;
 - b. refuse proposals for the change of use of a listed building where such a use would adversely affect its character or setting, or where insufficient details are submitted to enable the application to be appropriately assessed. Changes of use will normally be permitted where these would provide the best means of conserving the character, appearance, fabric, integrity and setting of a listed building;
 - c. impose conditions as necessary when granting consent to alter a listed building in order to protect the character afforded to that building by the retention or reinstatement of traditional features or materials;
 - d. require the display of signs and advertisements to respect the character of a listed building, and refuse applications which would entail structural alterations for the display of advertisements;
 - e. refuse applications for development which would adversely affect the setting or character of a listed building;

- f. refuse applications for extensions or alterations which would dominate the original building in either scale, material or situation;
- g. refuse applications which would involve the replacement of windows having glazing bars with sheet glass;
- h. refuse applications which involve the blocking up of windows or external doorways, or the making of new openings;
- i. refuse applications which involve repairs or alterations other than in matching materials and to the original design;
- j. refuse applications which would entail the removal of mouldings, balustrades, balconies, chimneys or other architectural features;
- k. refuse applications which would entail the introduction of incongruous period features such as shutters and bow windows;
- l. refuse applications which would entail use of replacement windows and doors in PVCu plastic;
- m. refuse applications involving major internal alterations, such as the reshaping of rooms, the removal of a staircase, the removal or destruction of panelling or stained glass, or alterations to roof trusses of interest.
- 8.14 The District Council encourages the retention of buildings of architectural and/or historic importance but recognises that their repair and maintenance costs can be particularly high, involving techniques and materials more expensive than those required for modern buildings.

Other buildings of special character

- 5.15 POLICY BE6 Using powers over the control of demolition and other development control powers, the District Planning Authority will refuse permission for redevelopment which would harm the character of groups of historic buildings up to and including early 20th Century buildings of distinctive or uniform architectural style. Permission will only be granted for developments which would reflect and contribute to that style.

Areas of special character

- 5.16 POLICY BE12 Planning permission for further development within the following Areas of Special Character as defined on the Proposals Map will not be granted if the development will harm the existing character of that area, by reason of either a loss of existing vegetation, especially in relation to important skylines; or a greater visual impact of buildings:
- a. the west end of Folkestone, and Radnor Cliff

Urban open space

- 5.17 Open space is an important element of the built environment, offering both opportunities for recreation and an environmental quality which adds to an area's attractiveness. Open space gives structure to the urban area and establishes a setting of landscape quality which, when retained, can preserve the character of the built environment and the level of residential amenity. Open space provides a strong visual contrast with the streetscene which is integral to the built environment's townscape value. This contrast may be fundamental to the built environment's character and particularly so in Conservation Areas. Recreational open space is protected by Policy LR9, but there are some areas where it is the value to visual amenity which is more important.
- 5.18 POLICY BE13 Development proposals which would result in the loss of urban open space with amenity value will only be granted where they meet the following criteria:
1. The benefits of the development proposed outweigh the loss of amenity value.
 2. There is a minimal impact on the character and appearance of the locality including the openness and tree cover of the existing site.
- 5.19 The visual impact of, and the extent of public use and access to the site will be important considerations in evaluating the existing amenity value.

Landscape and amenity

- 5.20 POLICY BE16 The District Planning Authority will require development proposals to retain important existing landscape features and make appropriate provision for new planting using locally native species of plants wherever possible. All full or detailed development proposals should be accompanied by a landscaping plan identifying both existing and proposed landscaping detail. The District Planning Authority will, where necessary, make any permission conditional upon a satisfactory landscaping scheme being agreed and implemented within a specified period, where such a scheme does not accompany an application.

Protection and provision of open space

- 5.21 POLICY LR9 The District Planning Authority will provide an adequate level of public open space for leisure, recreational and amenity purposes, by protecting existing and potential areas of open space and by facilitating new provision by means of negotiation and agreement.

- 5.22 Loss of open space
- 5.23 Areas of open space of recreation, leisure or amenity value or potential as identified on the Proposals Map will be safeguarded. Development proposals which would result in a net loss of such space will only be permitted if:-
- a. sufficient alternative open space exists;
 - b. development does not result in an unacceptable loss in local environmental quality;
 - c. it is the best means of securing an improved or alternative recreational facility of at least equivalent community benefit having regard to any deficiencies in the locality.
- 5.24 Provision of new open space
- 5.25 In deciding planning applications for residential development within areas where an open space deficiency exists or will be created, the District Planning Authority will be guided by the following criteria:-
- i. Sites of 25 or more dwellings should provide open space to the standard of 2.43 hectares (6 acres) per 1,000 population. Where full provision on site would not be appropriate or desirable the space needed may be met by commuted sum payment towards the provision or improvement of open space nearby on a scale related to the size and scale of the development;
 - ii. Sites for less than 25 dwellings should contribute towards the provision and improvement of open space on a scale related to the size and nature of the development.
- 5.26 Policy context relating to the historic environment is addressed in more detail in the heritage statement that accompanies the planning application.

6. EFFECTS UPON VISUAL AMENITY

- 6.1 The following tables summarise predicted effects that the proposed development would have on visual amenity, based on a selection of representative viewpoints.
- 6.2 All local photographs were taken on 24 March 2020. The long-distance photographs from the Kent Downs AONB are taken from archive photographs taken on 23 November 2017.
- 6.3 For each view the likely receptors of that view are identified, and a general assessment is made of the sensitivity of the receptor. For all assessed views, the duration of construction impact is assessed as Short Term (0-2years), whilst the duration / reversibility of operational impact is assessed as Permanent (ie there is no intention to return the site to its current state in the future, or to otherwise fundamentally change the design).
- 6.4 The sequence starts with a summary description of the view and its key townscape components. This is followed by a brief description of the predicted nature of change, and its geographic extent. Reference is also made to visual susceptibility, followed by an assessment of the magnitude of change in the view that would be brought about by the proposed development, on a simple High / Medium / Low scale.
- 6.5 The assessed effect of the proposed development is then described in terms of 'Adverse', 'Neutral' or 'Beneficial'.
- 6.6 A more detailed methodology is set out in the Appendix.

VIEW 1: VIEW EAST ALONG THE LEAS (POSITION ADJACENT TO WILLIAM HARVEY MEMORIAL STATUE)

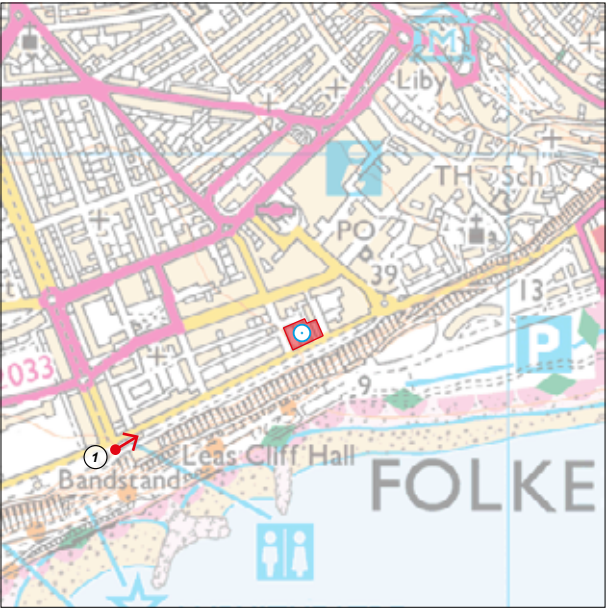
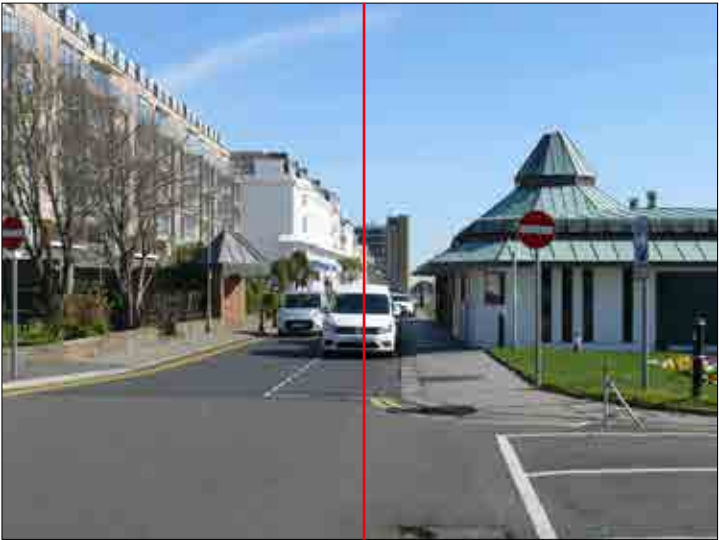
Date Taken: 24.03.2020.

Receptors: Occupants of vehicles; other road users including pedestrians and cyclists viewing east. Visitors to Leas Cliff Hall, local residents, tourists / holidaymakers

Sensitivity of Receptor: Medium / High. Land in the vicinity of the viewpoint is used for recreation purposes where views are important. View is within Conservation Area.

Description	Nature of change, including geographical extent (Site, Local, District, Regional)	Susceptibility:	Magnitude of change: High Medium Low	Assessed effect: Adverse Neutral Beneficial
View east along The Leas. Leas Pavilion Hall 'witches hat' entrance (right), late 20th century residential apartments to left (Carlton Leas 7 storeys above ground), with Southcliff Hotel beyond (5 1/2 storeys above ground). 4-storey Whitecliffs apartments just visible beyond. No.1 The Leas tower prominent in the distance, terminating the vista. Two trees within the Portland Hotel pub garden (left of view) amenity grass / landscape to right. Public highway and signage prominent.	The upper western arm of the proposed building would be visible in the distance, beyond the Whitecliffs apartments, partially obstructing the view of No.1 The Leas. The architecture would appear visually lighter than No.1 The Leas, with glazing and balconies stepping back from the road frontage above the fifth floor. The extent of change in this view would be Local.	Residential land use and hotels are characteristic land uses in the immediate vicinity of the site. A building of the scale and massing proposed would not be unexpected or unusual in this view. Parts of the site once supported large buildings (hotels now demolished), although these would not have been prominent in this view. The site has had a recent (2015) planning permission for residential development in a form not dissimilar to the current proposal, retaining and spanning the Pavilion, although lower than current proposal and planning permission expired.	Low	Beneficial Introduction of high quality, landmark architecture into a distant, partially hidden location, partially obscuring a building of mediocre townscape quality.

Approximate centre of site



VIEW 2: VIEW EAST ALONG THE LEAS (POSITION ON THE LEAS ESPLANADE OPPOSITE WHITECLIFFS APARTMENT)

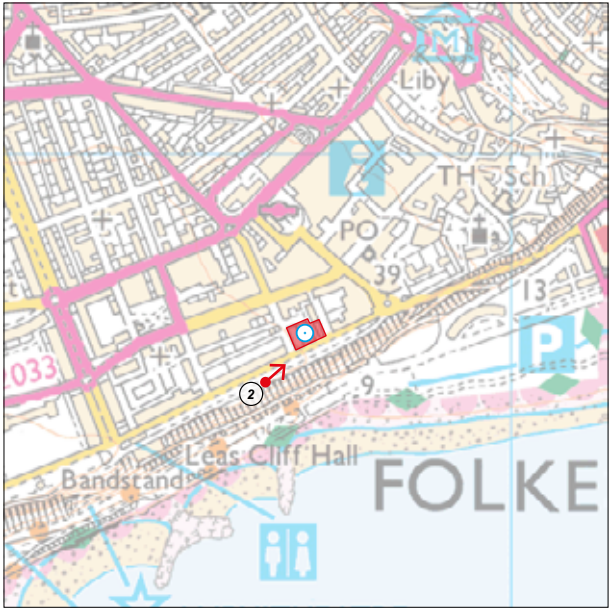
Date Taken: 24.03.2020.

Receptors: Pedestrians / cyclists on The Leas esplanade viewing east. Visitors to Leas Cliff Hall, local residents, tourists / holidaymakers. Visitors to the Step Short Memorial Arch

Sensitivity of Receptor: High. Land in the vicinity of the viewpoint is used for recreation purposes where views are important. Listed Pavilion and Memorial Arch are visible in the same view. View is within Conservation Area.

Description	Nature of change, including geographical extent (Site, Local, District, Regional)	Susceptibility:	Magnitude of change: High Medium Low	Assessed effect: Adverse Neutral Beneficial
Whitecliffs apartments (4 storey) prominent in left of view. No.1 The Leas (9/10 storey) prominent in the centre. 4-storeyPriors Leas dominated by No. 1 The Leas. The view is characterised / dominated by late 20th century architecture; the Leas Pavilion is barely noticeable. The 'gap' in the frontage built form is occupied by No.1 The Leas behind. Memorial arch, broad grass amenity space with benches and ornamental lighting. Highway and parked cars. This view is generally gained at a leisurely pace (ie not from within a moving vehicle).	A substantial new building would occupy the centre of the view, obstructing the western elevation of Priors Leas and much of the western elevation of No. 1 The Leas. The architecture would appear visually lighter than No.1 The Leas, with glazing and balconies stepping back from the road frontage above the fifth floor. The balconied south elevation would be consistent with the adjacent residential buildings. The extent of change in this view would be Local.	Residential land use and hotels are characteristic land uses in the immediate vicinity of the site. A building of the scale and massing proposed would not be unexpected or unusual in this view. Parts of the site once supported large buildings (hotels now demolished). The new building would be seen against the backdrop of an existing taller building. The site has had a recent (2015) planning permission for residential development in a form not dissimilar to the current proposal, retaining and spanning the Pavilion, although lower than current proposal and planning permission expired.	Medium	Beneficial Introduction of high quality landmark architecture into a prominent location, partially obscuring a building of mediocre townscape quality. Reconstruction of streetscape. Restoration of a valued building, currently at risk, for community use as part of an innovative and progressive architectural concept.

Approximate centre of site



VIEW 3: VIEW NORTH FROM THE LEAS (POSITION ON THE LEAS ESPLANADE OPPOSITE CHERITON PLACE)

Date Taken: 24.03.2020.

Receptors: Pedestrians / cyclists on The Leas esplanade viewing north. Visitors to Leas Cliff Hall, local residents, tourists / holidaymakers. Visitors to the Step Short Memorial Arch

Sensitivity of Receptor: High. Land in the vicinity of the viewpoint is used for recreation purposes where views are important. Listed Pavilion is visible. Memorial Arch is visible nearby. View is within Conservation Area.

Description	Nature of change, including geographical extent (Site, Local, District, Regional)	Susceptibility:	Magnitude of change: High Medium Low	Assessed effect: Adverse Neutral Beneficial
View towards southern boundary of appraisal site. Whitecliffs apartments to the left. No.1 The Leas to the right. Priors Leas to the right. Rear of properties along Sandgate Rd of varying heights (2-4 storey plus roof generally). Prominent white-finished 5-storey listed buildings on Longford Terrace with exposed gable following mid-1990's demolition. Derelict Leas Pavilion centre right. Prominent 'gap' in townscape. Highway and parked cars. Low rendered wall around car park. Broad grass amenity space, bench. A small number of deciduous trees. This view is generally gained at a leisurely pace (ie not from within a moving vehicle).	The gap in the architecture of The Leas would be occupied by a single large new building spanning across and behind the listed building. Surface car parking and rendered wall surrounding the car park would be removed. The new building would obstruct the western elevation of Priors Leas and part of the western elevation of No. 1 The Leas. Views of the rear of properties on Sandgate Road would be obscured, together with views of Longford Terrace. Views along Cheriton Place would be channeled by the new building. The architecture would appear visually lighter than No.1 The Leas, with glazing and balconies stepping back from the road frontage above the fifth floor. Views of the sky above Sandgate Rd and Longford Terrace would be obstructed by the new building. The extent of change in this view would be Local.	Residential land use and hotels are characteristic land uses in the immediate vicinity of the site. A building of the scale and massing proposed would not be unexpected or unusual in this view. Parts of the site once supported large buildings (hotels now demolished). The new building would be seen in the context of an existing tall building. The site has had a recent (2015) planning permission for residential development in a form not dissimilar to the current proposal, retaining and spanning the Pavilion, although lower than current proposal and planning permission expired.	High	Beneficial Introduction of high quality landmark architecture into a prominent location, filling a visually discordant gap in the townscape, partially obscuring a building of mediocre townscape quality. Reconstruction of streetscape. Restoration of a valued building, currently at risk, for community use as part of an innovative and progressive architectural concept.

Approximate centre of site



VIEW 4: VIEW WEST FROM STEP SHORT MEMORIAL ARCH

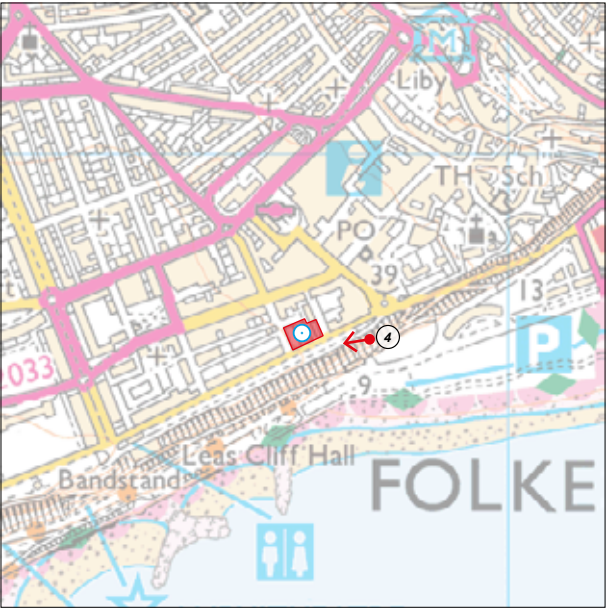
Date Taken: 24.03.2020.

Receptors: Visitors to the Step Short Memorial Arch. Pedestrians / cyclists on The Leas esplanade viewing west. Visitors to Leas Cliff Hall, local residents, tourists / holidaymakers.

Sensitivity of Receptor: High. Memorial Arch is visible nearby. Land in the vicinity of the viewpoint is used for recreation purposes where views are important. Listed Pavilion is (partially) visible. View is within Conservation Area.

Description	Nature of change, including geographical extent (Site, Local, District, Regional)	Susceptibility:	Magnitude of change: High Medium Low	Assessed effect: Adverse Neutral Beneficial
Oblique view towards southern boundary of appraisal site. Mid to late 20th century architecture dominates the view. Whitecliffs apartments to the centre left. Priors Leas to the right. Distinctive curved balcony separators. Unified architectural forms either side of derelict Leas Pavilion (just evident centre right). Prominent 'gap' in esplanade architecture, with view through to Pleydell Court (within Pleydell Gardens). Highway and parked cars. Broad grass amenity space, benches and ornamental lighting columns. Memorial Arch and associated hard landscape. Folkestone Airmen and Women's Memorial. Distant view of Leas Cliff Hall entrance building to the left and Clifton Gardens (Clifton Hotel) at right angles to the Leas terraces, centre left. This view is generally gained at a leisurely pace (ie not from within a moving vehicle).	The gap in the architecture of The Leas would be occupied by a single large new building spanning across and behind the listed building. The new building would obstruct the eastern elevation of the Whitecliffs apartments. The new building would be noticeably taller than the adjacent modern residential terraces, but would step back from the frontage above the 5th floor. The balconied south elevation would be consistent with the adjacent residential buildings. The wings of the new building would be angled back to allow the restored pavilion to retain a visual presence on The Leas. Existing views into Pleydell Gardens would be obstructed by the new building. The extent of change in this view would be Local.	Residential land use and hotels are characteristic land uses in the immediate vicinity of the site. A building of the scale and massing proposed would not be unexpected or unusual in this view. Parts of the site once supported large buildings (hotels now demolished). The site has had a recent (2015) planning permission for residential development in a form not dissimilar to the current proposal, retaining and spanning the Pavilion, although lower than current proposal and planning permission expired.	Medium	Beneficial Introduction of high quality landmark architecture into a prominent location, filling a gap in the townscape, partially obscuring a 20th century side elevation of functional appearance. Reconstruction of streetscape. Restoration of a valued building, currently at risk, for community use as part of an innovative and progressive architectural concept.

Approximate centre of site



VIEW 5: VIEW SOUTH ALONG LONGFORD TERRACE

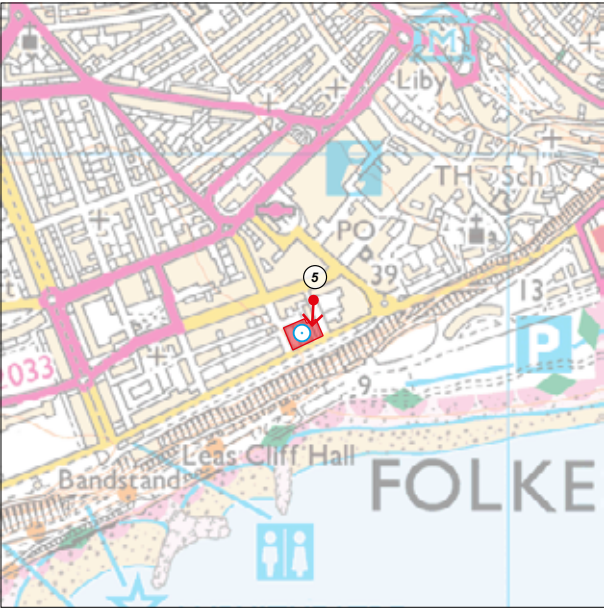
Date Taken: 24.03.2020.

Receptors: Occupants of vehicles; other road users including pedestrians and cyclists viewing south. Pedestrians moving between esplanade and Sandgate Rd. Local residents, tourists / holidaymakers

Sensitivity of Receptor: Medium. Functional location with offices, car parking, residential and retail nearby. Some views of listed buildings. View is within Conservation Area.

Description	Nature of change, including geographical extent (Site, Local, District, Regional)	Susceptibility:	Magnitude of change: High Medium Low	Assessed effect: Adverse Neutral Beneficial
Channelled view south along Longford Terrace towards The Leas with functional brick service structure and Priors Leas (in shadow) to left and No.4 Longford Terrace to right, with archway under. Public highway a dominant feature. Unattractive view to left (out of shot) with No.1 The Leas and surface car parking area dominant. Leas Pavilion not evident in this view, although rendered low wall around eastern car park is just visible. Distant view of seat and lighting column on The Leas, with tree on Leas Cliff projecting above the horizon. Despite the tall buildings in the view a lot of sky is visible, but no view of the sea.	The eastern elevation of the proposed building would continue the built form of the terrace on the right. The new building would introduce modern architecture juxtaposed with the historic terrace. On this elevation the horizontal architectural banding of the new building would be supplemented with strong vertical elements responding to the elevational rhythm of the adjacent historic terrace. The rendered wall around the car park would be removed. An element of open sky would be obstructed, reinforcing the channelling effect and focusing the view on The Leas.	Residential land use and hotels are characteristic land uses in the immediate vicinity of the site. A building of the scale and massing proposed would not be unexpected or unusual in this view. The visible part of the site in this view of once supported a large building (Longford Hotel demolished mid-1990's). The element of open sky that would be 'lost' by the introduction of the new building would historically have been obstructed by the original Longford Hotel. The site has had a recent (2015) planning permission for residential development in a form not dissimilar to the current proposal, retaining and spanning the Pavilion, although lower than current proposal and planning permission expired.	High.	Beneficial Introduction of high quality landmark architecture into a prominent location, juxtaposed with and responding to the architecture of the historic terrace. Reconstruction of streetscape.

Approximate centre of site



VIEW 6: VIEW SOUTH EAST FROM JUNCTION OF CHERITON PLACE AND LONGFORD WAY

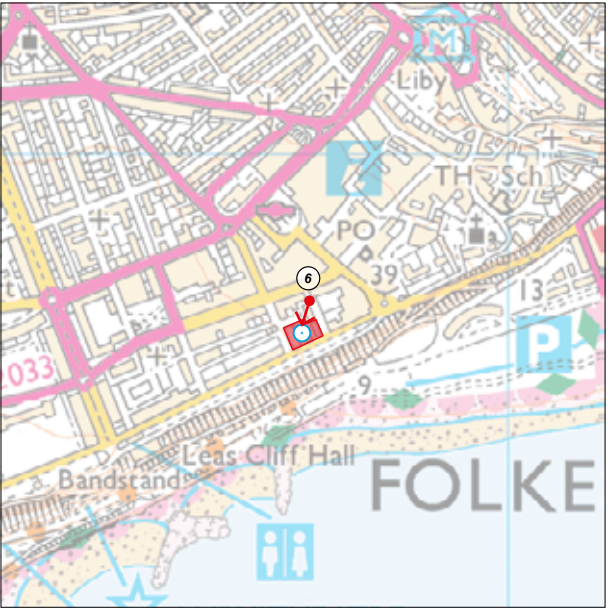
Date Taken: 24.03.2020.

Receptors: Occupants of vehicles; other road users including pedestrians and cyclists viewing south east. Pedestrians moving between esplanade and Sandgate Rd. Local residents, tourists / holidaymakers. Users of adjacent Public Conveniences.

Sensitivity of Receptor: Medium. Functional location with offices, car parking, residential and retail nearby. Some views of listed buildings. View is within Conservation Area.

Description	Nature of change, including geographical extent (Site, Local, District, Regional)	Susceptibility:	Magnitude of change: High Medium Low	Assessed effect: Adverse Neutral Beneficial
Cluttered and fragmented view, with highways and road signage prominent. Landscaped foreground with mature trees and hedging to right, around Public Conveniences and into Pleydell Gardens. Distinctive white curved elevation turning the corner of the two streets. Longford Terrace left middle distance behind tree with western elevation of Priors Leas beyond / right. Tower and upper part of No.1 The Leas evident behind Longford Terrace. Whitecliffs Apartments to right. Gap in townscape provides open sky but no sea view. Distant views of pine tree canopies projecting above the Leas cliff.	The new building would occupy the central section of the view, obstructing views of Priors Leas and the tower of No.1 The Leas. A large element of sky would be obstructed by the new building. A narrow section of Longford Terrace and its archway would be visible to the left. The street tree to the left would be retained. The views of the distant pine trees would be obstructed Views towards The Leas would be confined to a channelled view along Cheriton Place, with the western elevation of the new building complemented by the existing landscaping on the opposite side of the road.	Residential land use and hotels are characteristic land uses in the immediate vicinity of the site. A building of the scale and massing proposed would not be unexpected or unusual in this view. The visible part of the site in this view once supported a large building (hotel now demolished). The element of open sky that would be 'lost' by the introduction of the new building would historically have been obstructed by the buildings demolished in the mid 1990's. The site has had a recent (2015) planning permission for residential development in a form not dissimilar to the current proposal, retaining and spanning the Pavilion, although lower than current proposal and planning permission expired.	High	Beneficial Introduction of high quality landmark architecture into a prominent and visually discordant location, reinstating former urban grain. Reconstruction of streetscape. Restoration of a valued building, currently at risk, for community use as part of an innovative and progressive architectural concept.

Approximate centre of site



VIEW 7: VIEW EAST FROM PLEYDELL GARDENS

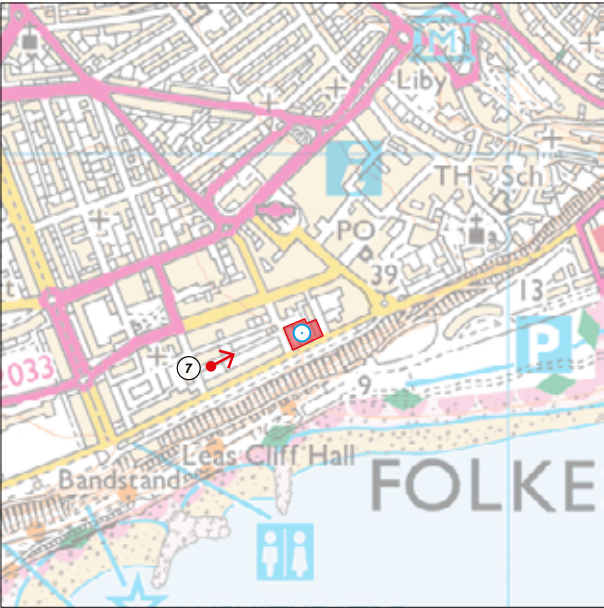
Date Taken: 24.03.2020.

Receptors: Occupants of vehicles accessing residential car parks. Other road users including pedestrians and cyclists viewing east. Local residents including residents of Pleydell Court (behind and left of viewpoint) viewing east.

Sensitivity of Receptor: Low / medium. Functional land uses; some views of listed buildings. View is within Conservation Area.

Description	Nature of change, including geographical extent (Site, Local, District, Regional)	Susceptibility:	Magnitude of change: High Medium Low	Assessed effect: Adverse Neutral Beneficial
Cluttered and fragmented view dominated by car parking and signage. Office and retail buildings to the left of the view (rear of properties on Sandgate Rd) and residential to the right (rear of Whitecliffs apartments). White western elevation of No. 4 Longford Terrace visible between the trees, with No. 1 The Lease a prominent backstop to the rear. Priors Leas largely hidden behind trees. Avenues of small trees provide some unity and softness to an otherwise harsh and discordant view.	A substantial new building would be introduced into the centre right of the view in the middle distance. It would be partially obscured by existing trees, and more so for most of the year after leaf formation on deciduous trees. The new building would obstruct views of No.1 The Leas, No. 4 Longford Terrace and Priors Leas.	Residential land use and hotels are characteristic land uses in the immediate vicinity of the site. A building of the scale and massing proposed would not be unexpected or unusual in this view. The visible part of the site in this view of once supported a large building (hotel now demolished). Demolition of the buildings along Cheriton Place in the 1990's has caused views to leak out eastwards, damaging the spatial definition of this element of townscape. Introduction of car parking and associated signage has further detracted from the visual qualities of the townscape. The site has had a recent (2015) planning permission for residential development in a form not dissimilar to the current proposal, retaining and spanning the Pavilion, although lower than current proposal and planning permission expired.	Medium	Beneficial Introduction of high quality landmark architecture into a prominent and visually discordant location, reinstating former urban grain, and obstructing views of an existing building of mediocre townscape quality. Reconstruction of streetscape and redefinition of visual / spatial quality of Pleydell Gardens.

Approximate centre of site



VIEW 8: VIEW SOUTH ALONG CHERITON PLACE

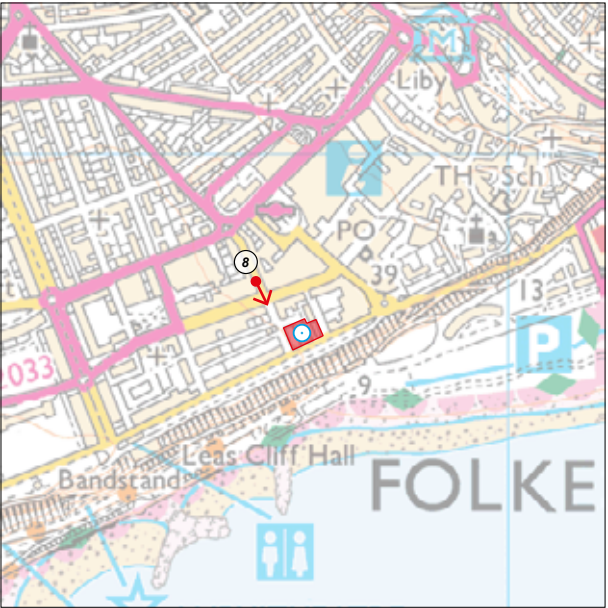
Date Taken: 24.03.2020.

Receptors: Pedestrians accessing shops, services, using footway travelling south.

Sensitivity of Receptor: High. View is within Conservation Area.

Description	Nature of change, including geographical extent (Site, Local, District, Regional)	Susceptibility:	Magnitude of change: High Medium Low	Assessed effect: Adverse Neutral Beneficial
View south along Cheriton Place, from a position north of Sandgate Rd intersection (opposite no. 98A). Channelled view towards The Leas between fine historic buildings. Architectural turret and ornate gables, with some polychromatic detailing and arched windows. Retail at street level. Art nouveau shopfront to left, unremarkable brick retail unit to right. Distant view of appraisal site and its low rendered walls, and The Leas. Part of deciduous tree canopy visible along Cheriton Place. Narrow, open horizon, but no view of the sea.	The western elevation of the proposed building would continue the built form of the terrace (scaffolded). The new building would introduce modern architecture juxtaposed with these historic buildings. The rendered wall around the car park would be removed. An element of open sky would be obstructed, reinforcing the channelling effect and focusing the view on The Leas.	Residential land use and hotels are characteristic land uses in the immediate vicinity of the site. A building of the scale and massing proposed would not be unexpected or unusual in this view. The visible part of the site in this view once supported a large building (hotel now demolished). The element of open sky that would be 'lost' by the introduction of the new building would historically have been obstructed by the buildings demolished in the mid 1990's. The site has had a recent (2015) planning permission for residential development in a form not dissimilar to the current proposal, retaining and spanning the Pavilion, although lower than current proposal and planning permission expired.	Medium	Beneficial Introduction of high quality landmark architecture into the mid-distance of the view, reinstating former urban grain. Reconstruction of streetscape.

Approximate centre of site



VIEW 9: VIEW SOUTH FROM SANDGATE ROAD

Date Taken: 24.03.2020.

Receptors: Pedestrians accessing shops, services, using pedestrian link travelling south.

Sensitivity of Receptor: High. View is within Conservation Area.

Description	Nature of change, including geographical extent (Site, Local, District, Regional)	Susceptibility:	Magnitude of change: High Medium Low	Assessed effect: Adverse Neutral Beneficial
View south from Sandgate Road, through pedestrian link to Longford Terrace. Channelled view towards The Leas with Longford Terrace to right, with archway under just visible. Retail units in the foreground Leas Pavilion not evident in this view. Distant view of The Leas, with tree on Leas Cliff projecting above the horizon. Despite the tall buildings in the view an element of sky is visible, but no view of the sea.	The eastern elevation of the proposed building would continue the built form of the terrace on the right. The new building would introduce modern architecture juxtaposed with the historic terrace. On this elevation the horizontal architectural banding of the new building would be supplemented with strong vertical elements responding to the elevational rhythm of the adjacent historic terrace. An element of open sky would be obstructed, reinforcing the channelling effect and focusing the view towards The Leas.	Residential land use and hotels are characteristic land uses in the immediate vicinity of the site. A building of the scale and massing proposed would not be unexpected or unusual in this view. The visible part of the site in this view once supported a large building (hotel now demolished). The element of open sky that would be 'lost' by the introduction of the new building would historically have been obstructed by the buildings demolished in the mid 1990's. The site has had a recent (2015) planning permission for residential development in a form not dissimilar to the current proposal, retaining and spanning the Pavilion, although lower than current proposal and planning permission expired.	Medium	Beneficial Introduction of high quality landmark architecture into the mid-distance of the view, reinstating former urban grain. Reconstruction of streetscape.

Approximate centre of site



VIEW 10: VIEW NORTH WEST FROM BEACH PATH SOUTH OF MARINE CRESCENT.

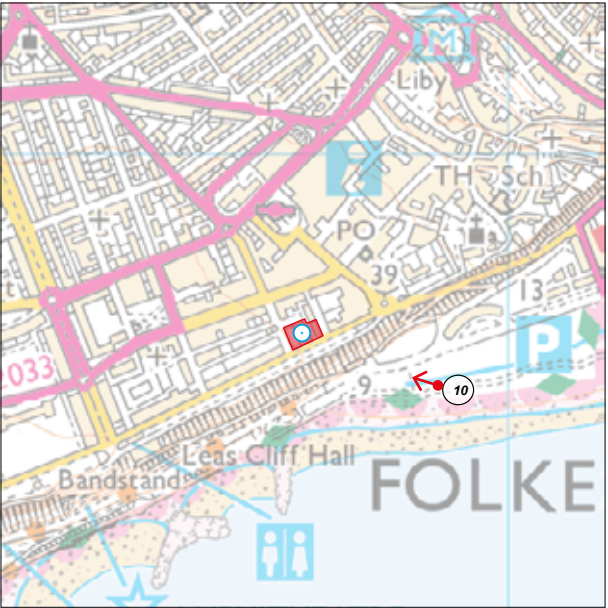
Date Taken: 24.03.2020.

Receptors: Users of beach path (boardwalk), holidaymakers on beach

Sensitivity of Receptor: High. View within and towards Conservation Area experienced through leisure activity

Description	Nature of change, including geographical extent (Site, Local, District, Regional)	Susceptibility:	Magnitude of change: High Medium Low	Assessed effect: Adverse Neutral Beneficial
View north west from beach path south of Marine Crescent. Foreground construction work. Dramatic view of Leas Cliff with cliff lift visible centre left. Prominent white elevations of Southcliff and Carlton Hotels visible to the left. Priors Leas and Whitecliffs are lower in height, less brightly finished, and partially obscured by vegetation. Eastern (side) elevation of Whitecliffs visible. Distinctive profile of No.1 The Leas to right, rising above vegetated cliff.	A substantial new building would occupy the centre of the view, above the Leas Lift, and to the left of No.1 The Leas. In this view the new building would appear lower than No.1 The Leas. It would be physically lower and it would be further away from the viewpoint. This combined with the step-back in the building's massing would mean the new building would be far less assertive in this view than No.1 The Leas, and more respectful to the clifftop setting. The proposed new building would represent a transition in massing and height between the tall historic terraces to the left of the view and the abrupt tall building to the right. The new building would appear visually lighter than No.1 The Leas, due to choice of materials. The introduction of the new building would involve the loss of a small element of sky in this view. The extent of change in this view would be Local. For occupants of craft in the channel, the change in the clifftop's profile resulting from the construction of the new building would be visible from distance, so for these receptors the change would be 'District' in extent.	Residential land use and hotels are characteristic land uses above the clifftop, facing the sea. A building of the scale and massing proposed would not be unexpected or unusual in this view. Although the proposed new building will change the current visual setting of the listed Leas Lift in this view, the southern elevations of the original hotel / residential buildings that once occupied the appraisal site would have been visible in this view prior to their demolition, evidenced by the fact that they were both taller than Whitecliffs and Priors Leas, both of which are visible in this view. These former buildings would also have obstructed a small element of sky in this view, prior to their demolition. The site has had a recent (2015) planning permission for residential development in a form not dissimilar to the current proposal, retaining and spanning the Pavilion, although lower than current proposal and planning permission expired.	Medium	Beneficial Although less marked than at The Leas level, the townscape 'gap' in the built frontage is still evident. Introduction of high quality landmark architecture into the mid-distance of the view would contribute to the distinctive clifftop profile, occupying the gap in the frontage and achieving a transition in height and massing between the traditional terraces to the west (left) and the modern tower to the right.

Approximate centre of site



VIEW 11: VIEW NORTH EAST FROM COASTAL PATH

Date Taken: 24.03.2020.

Receptors: Pedestrians and cyclists

Sensitivity of Receptor: High. View is within and towards Conservation Area, and experienced through leisure activity

Description	Nature of change, including geographical extent (Site, Local, District, Regional)	Susceptibility:	Magnitude of change: High Medium Low	Assessed effect: Adverse Neutral Beneficial
View north east from the coastal path. Heavily vegetated cliff side. Ornamental gardens with some exotic planting. Ragstone walling, esplanade, lighting, steps, seating, balustrades and fencing. Maintained amenity grass. Marine Crescent to right of view. Upper part of the yellow brick tower of No.1 The Leas projecting into the skyline above the clifftop, with upper parts of the residential block also visible above and behind the vegetation.	The proposed new building would be located central to the view, to the left of No.1 The Leas. The viewpoint is close to the Zone of Theoretical Visibility 'blind zone' created by the cliff, so little of the new building would be visible from here, obscured by the cliff and its trees (mostly evergreen). Moving south onto the beach would reveal more of the clifftop buildings (including the proposed new building). Moving north into the gardens would obscure all the buildings. The elevations of No.1 The Leas are vertical up to the 9th floor. The massing of the proposed new building steps back above the fifth floor, so the upper part of the new building would not project above the skyline in the way that No.1 The Leas does. The step-back in the proposed building's massing would mean that even when visible it would be far less assertive than No.1 The Leas, and more respectful to the clifftop setting. The extent of change in this view would be Local. For occupants of craft in the channel, the change in the clifftop's profile resulting from the construction of the new building would be visible from distance, so for these receptors the change would be 'District' in extent.	This view, and View 10 above, show that from a number of locations along the coastal path, the tops of residential buildings and hotels appear above the clifftop vegetation. This is characteristic of views gained from these locations. A building of the scale and massing proposed would not be unexpected or unusual in this view.	Low	Neutral. It is anticipated that little of the new building would be visible in this view, and this is mainly a product of this particular viewpoint location. Those parts of the building that might be seen just above or through the clifftop vegetation, would be seen in the context of an existing tall building.

Approximate centre of site

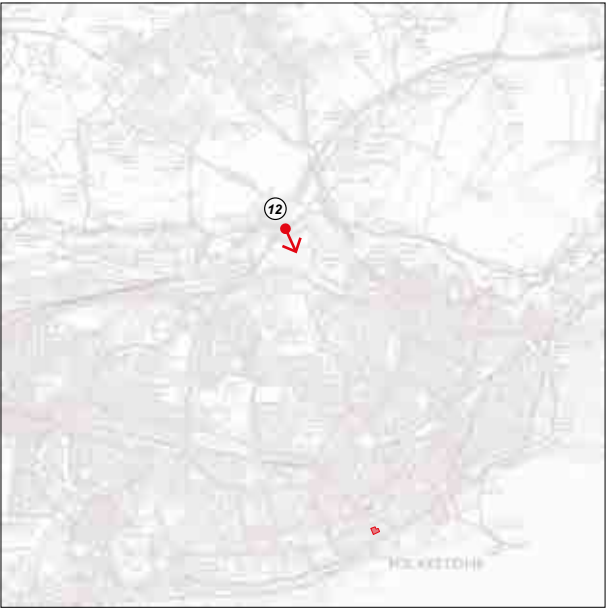


VIEW 12: VIEW NORTH FROM ABOVE ROUND HILL TUNNEL (PROW HF51)

Date Taken: 23.11.2017.
Receptors: Pedestrians (walkers, dog-walkers).
Sensitivity of Receptor: High (AONB; PROW).

Description	Nature of change, including geographical extent (Site, Local, District, Regional)	Susceptibility:	Magnitude of change: High Medium Low	Assessed effect: Adverse Neutral Beneficial
View north from above Round Hill Tunnel. This is a distant elevated view approximately 2.65km from the site. Chalk downland in the foreground. Park Farm Industrial Estate is prominent in the middle distance, sea and sky. On the land horizon against the sea, the mass silhouettes of (from right to left) The Metropole and the Grand, with the spire of the Holy Trinity Church a little further to the left. Then a fairly uniform tract of roofscape before the profile of No.1 The Leas in the centre left of the view, with Europa House just to its left. The top of the Burstin Hotel is just visible in the harbour area to the left.	There would be very little change in this view. The proposed new building would introduce a very small additional built component just to the right of No.1 The Leas. The overall composition and quality of the view would be unchanged.	The distant horizon against the sea is a developed townscape. The introduction of a new building within this townscape would not be unexpected or unusual.	Low	Neutral

Approximate centre of site



VIEW 13: VIEW SOUTH EAST FROM NORTH DOWNS WAY / SAXON SHORE WAY (PROW HF21)

Date Taken: 23.11.2017.
Receptors: Users of PROW
Sensitivity of Receptor: High (AONB; PROW)

Description	Nature of change, including geographical extent (Site, Local, District, Regional)	Susceptibility:	Magnitude of change: High Medium Low	Assessed effect: Adverse Neutral Beneficial
This is a distant elevated view approximately 3.4 km from the site, close to Crete Road West. Chalk downland in the foreground. CTRL infrastructure dominates centre right. Shearway Business Park is in the middle distance, sea and sky. On the land horizon against the sea, from right to left the silhouette of the spire of the Holy Trinity Church is visible to the right. A little to the left No.1 The Leas is prominent, with its western elevation reflecting the sun. Europa House is just to its left. The top of the Burstin Hotel is just visible to the left of this - again light in colour. Martello Tower No.3 can just be seen in the centre left.	There would be very little change in this view. The proposed new building would introduce a very small additional built component just to the right of No.1 The Leas. The overall composition and quality of the view would be unchanged.	The distant horizon against the sea is a developed townscape. The introduction of a new building within this townscape would not be unexpected or unusual.	Low	Neutral

Approximate centre of site



7. EFFECTS UPON TOWNSCAPE

7.1 For the purposes of this study, predicted impacts upon the following townscape receptors have been identified for appraisal:

- Topography and geology
- Land use
- Vegetation
- The Public Highway and Public Right of Way network
- Townscape Character (including urban grain and building heights)

7.2 Predicted impacts upon views from the Kent Downs AONB would be considered visual only and are not included in this part of the report.

CONSTRUCTION AND OPERATIONAL PHASES

7.3 This appraisal addresses principally the operational phase of the project, in other words, the effects on townscape of the completed building.

7.4 Building construction work in towns is part of the experience of townscape. It is a familiar and expected activity, and not unusual or uncharacteristic.

7.5 In the case of the Leas Pavilion, the design of the new building is unusual in that it incorporates and restores an existing Listed Building as part of its fabric. This will require non-conventional engineering and construction processes.

7.6 Construction phase impacts on townscape for the Leas Pavilion site are predicted to be associated with initial demolition and ground engineering works, followed by progressive construction work to completion.

7.7 The construction phase will involve impacts normally associated with town centre construction projects of this nature and magnitude.

- Deliveries and vehicle movements
- Plant and machinery
- Storage of materials
- Contractor's secure compound
- Scaffolding
- Noise, dust, vibration
- Security lighting.

- Security fencing
- Progressive visual / physical change in the site as the project develops to completion.

7.8 There will be temporary impacts on townscape and visual resources, including nearby listed buildings, as construction work takes place. This can be partially mitigated by use of well-designed hoardings, for example, or by the introduction of interpretation about the project, the Leas Pavilion and its history.

7.9 Impacts will be temporary - for the duration of the construction phase, and can be mitigated by the adoption of control methodologies (such as the Considerate Constructor's Scheme), which can be applied and enforced through normal planning mechanisms.

7.10 To summarise Construction Phase impacts these are assessed to be:

7.11 **Moderate to Major** in scale - this is not a small scale building project, due to its height and complexity. Its construction will generate more impacts on townscape and visual resources than a domestic scale project. Neither is it a major project such as a multiple block city centre redevelopment scheme.

7.12 **Local** in terms of extent - construction impacts will be felt more widely than within the site itself, but not at district or regional level.

7.13 **Short term** duration, with effects felt for less than 5 years.

7.14 Capable of mitigation, but not to the extent that construction impacts will not be experienced.

7.15 Magnitude of change during the construction phase is assessed as **Medium**.

7.16 Construction effects will be **Adverse** in nature.

TOPOGRAPHY AND GEOLOGY**Nature of change**

7.17 Locally the site's natural topography has already been modified significantly as a result of the construction of the Leas Pavilion, largely subterranean, by the construction of the hotel / residential buildings on the remainder of the site (now demolished), and the construction of the car park.

7.18 More widely, topography has been modified as a result of construction works for adjacent roads and buildings, and The Leas itself.

7.19 Susceptibility of the site to accommodate further changes to topography and geology for the purposes proposed is therefore low.

7.20 This is not a structural report, so an assumption is made that although the Leas Pavilion will be restored and its foundations will remain unchanged (other than whatever repairs might be required), the new building will require deep foundations that will penetrate into the underlying geology. Foundation depths are not known at this stage.

7.21 Change to the site's natural topography will be largely unchanged as a result of the construction of the new development.

Direct or indirect

7.22 Site impacts on topography and geology will be **Direct**.

7.23 The construction project will generate spoil which will need to be disposed off-site. Depending on the nature of this disposal, it could have an **Indirect** effect on the receptor site.

Short, medium or long-term duration

7.24 The duration of the impact will be **Short-term**. It is anticipated that the duration of construction works will be less than 2 years.

Permanent or temporary

7.25 The proposal is for the building to be **Permanent**. There is no intention for the site to revert to its current state at some stage in the future.

Size / scale of change (Major, Moderate, Minor or Negligible)

7.26 Impacts upon topography and geology would be **Minor**.

Geographic extent (Site, Local, District, Regional)

7.27 Geographic extent of impacts upon topography and geology would be largely **Site** - most impacts would be accommodated within the boundary of the site.

- 7.28 Removal of material to a local receptor site could have a wider impact on topography elsewhere. This effect would be **Local** in extent.

Reversibility

- 7.29 The changes in topography and geology would be **Non-reversible**.

Magnitude of Change (High, Medium, Low, Negligible)

- 7.30 Overall Magnitude of Change to topography and geology is assessed as **Low**.

Beneficial / Adverse / Neutral

- 7.31 Impact on topography is predicted to be **Neutral**.
- 7.32 Impact on geology is predicted to be **Adverse**, but this would be minor and restricted to within the site.

LAND USE AND VEGETATION

Nature of change

- 7.33 Land use will change from car parking and Grade II Listed derelict former entertainment hall to residential with car parking and restored Grade II Listed community / entertainment facility. In land use terms the site accommodated residential / hotel uses until the mid 1990's.
- 7.34 There is very little vegetation on the site at present. A short stretch of hedgerow will be removed from behind the parapet wall on the site frontage to The Leas.
- 7.35 A single street tree to the rear of the site (Longford Way) is to be retained and protected during siteworks.
- 7.36 Green roofs are to be provided on the new building.
- 7.37 Balconies are to be provided on the new building providing opportunities for residents to introduce planting (in planters / containers).
- 7.38 The base plinth of the new building has been designed with integrated planters to allow for new planting at street level.
- 7.39 The recommendations of the project ecologists include for native-species planting and the incorporation of bird and bat boxes into the architecture.

Direct or indirect

- 7.40 Site impacts on land use and vegetation will be **Direct**.

Short, medium or long-term duration

- 7.41 The duration of the impact will be **Short-term**. It is anticipated that the duration of construction works will be less than 2 years.

Permanent or temporary

- 7.42 The proposal is for the building to be **Permanent**. There is no intention for the site to revert to its current state at some stage in the future. The disposition of vegetation and land use will be permanently changed.

Size / scale of change (Major, Moderate, Minor or Negligible)

- 7.43 Impacts upon land use would be **Moderate/Minor**. Although the site currently supports no residential use, there are existing residential land uses immediately to the east and west of the site, and the site historically supported residential / hotel use in the past. The prevailing land use along The Leas is residential.

- 7.44 Impacts upon vegetation would be **Minor**. There will be a net gain in vegetation cover on the site.

Geographic extent (Site, Local, District, Regional)

- 7.45 Geographic extent of impacts upon land use and vegetation would be **Site** - changes would be accommodated within the boundary of the site.

Magnitude of Change (High, Medium, Low, Negligible)

- 7.46 Overall Magnitude of Change to land use and vegetation is assessed as **Low**.

Beneficial / Adverse / Neutral

- 7.47 Parking for residents will be provided on-site, but there will be a loss of car parking spaces for the public. These people will need to find an alternative car park, or find alternative means of transport to access their destination, such as cycling or public transport.
- 7.48 Impact on land use is predicted to be **Beneficial**. The site currently supports no residential use. There is a national shortage of housing.
- 7.49 The site supports very little vegetation.
- 7.50 Impact on vegetation is predicted to be **Beneficial**. There will be a net gain in vegetation cover as a result of the new development.

PUBLIC HIGHWAY AND PUBLIC RIGHTS OF WAY NETWORK

Nature of change

- 7.51 This relates principally to site access and permeability. There will be no change in the physical configuration or distribution of public highways or public rights of way in the wider townscape. Views from highways and public rights of way are addressed in the visual appraisal section of this report.
- 7.52 There will be a minor change to the way in which the site is accessed. Vehicle and pedestrian access to the privately run car parks is currently gained from Longford Terrace and Cheriton Place. There is no public access to the Leas Pavilion.
- 7.53 The new development will provide vehicular access from Longford Way to the rear of the site, and from Longford Terrace to the east. There will be no access from Cheriton Place. The main access for residents will be via the refurbished Leas Pavilion, accessed directly from The Leas, as it was historically. This will also be the access used for community / entertainment events.
- 7.54 Disabled access to the restored Leas Pavilion will be gained via the internal ramps from street level, and lifts accessing lower ground floor and gallery levels. Historically these levels could only be accessed by steps.
- Direct or indirect*
- 7.55 Site impacts on public highways and public rights of way will be **Direct**.
- Short, medium or long-term duration*
- 7.56 The duration of the impact will be **Short-term**. It is anticipated that the duration of construction works will be less than 2 years.
- Permanent or temporary*
- 7.57 The proposal is for the building to be **Permanent**. There is no intention for the site to revert to its current state at some stage in the future. Site access arrangements will be permanently changed.
- Size / scale of change (Major, Moderate, Minor or Negligible)*
- 7.58 Impacts upon public highways and public rights of way would be **Minor**.

Geographic extent (Site, Local, District, Regional)

- 7.59 Geographic extent of impacts upon land use and vegetation would be **Site** - changes would be accommodated within the boundary of the site, and at the junction with the highway / The Leas.

Magnitude of Change (High, Medium, Low, Negligible)

- 7.60 Overall Magnitude of Change to public highways and public rights of way is assessed as **Low**.

Beneficial / Adverse / Neutral

- 7.61 The changes to access positions from the public highway are assessed as **Neutral**. The proposed restoration, re-opening and re-use of the Leas Pavilion to provide pedestrian access, including disabled access, to the hall and the new residential building for The Leas is assessed as **Beneficial**.

URBAN GRAIN AND BUILDING HEIGHT**Nature of change**

- 7.62 The proposed development would involve the construction of a new building taking up the plot bounded by The Leas, Cheriton Place, Longford Terrace and Longford Way, although set back from The Leas frontage to retain the frontage setting of the Leas Pavilion, and a further set-back to the rear onto Longford Way.
- 7.63 There will be no change in the overall plot size. Historically the site accommodated hotel / residential buildings arranged in wings either side of the Pavilion. This will be largely replaced within-plot, with additional development spanning above the Pavilion. Whilst the plot size will remain unaltered in terms of townscape, the density of development within the plot will intensify substantially over current (baseline) conditions, and partially over historic conditions.
- 7.64 The former buildings either side of the Pavilion were 4/5 storeys in height, comprising accommodation in roof space above four tall ceiling-to-floor storeys. These had narrow sea-facing elevations, and their long elevations were aspected towards the streets either side (Cheriton Place and Longford Terrace), and towards each other, across the roof of the Leas Pavilion. Bay windows in these elevations provided oblique views towards the sea, but sea views were not maximised.

- 7.65 With the proposed development, the principal orientation / aspect of the built form on the site will change, with more of the building mass addressing The Leas and the sea.

- 7.66 In some of the historic photographs the distinctive gable of 88 Sandgate Rd (currently Kentucky Fried Chicken) was visible over the top of buildings on the southern side of Sandgate Rd, and it would appear that at least one of the buildings on the northern side of Longford Way was aspected south over the Pavilion and between the residential wings. This relationship has been lost over time, and the northern side of Longford Way is now largely given over to rear parking for three units on Sandgate Rd. This is therefore not a principal aspect, and would face the rear elevation of the new building.

- 7.67 With regard to building heights, this appraisal does not include an assessment of light or wind movement.

- 7.68 In terms of storey heights, the progression eastwards along the northern side of The Leas from the Leas Cliff Hall entrance is as follows:

- Carlton Leas: 7 storeys including one in roof.
- Southcliff Hotel: 5 storeys including one in roof plus semi-basement.
- Carlton Hotel: 4 storeys including one in roof plus semi-basement.
- Whitecliffs: 4 storeys
- Leas Pavilion: half-storey above pavement level. Proposed nine storeys.
- Priors Leas: 4 storeys.
- No.1 The Leas: 9 storeys, plus tower.

- 7.69 The proposed development comprises nine floors of new residential accommodation above the Pavilion level. The top of the new building will be 71.55m AOD plus an additional 0.6m in two locations for the two lift shafts.

- 7.70 Levels have been taken by JC White surveyors for the top of the tower and residential block of No.1 The Leas, and the adjacent pavement level, as well as levels around the Pavilion.

- 7.71 The top of No.1 The Leas' tower is 76.2m AOD, with the top of the residential block 71.1m AOD.

- 7.72 In absolute (height Above Ordnance Data) terms, the tower of No.1 The Leas would therefore be 4.65m higher than the top part of the proposed building, excepting the two locations accommodating the additional height for the lift shafts, where it would be 4.05m higher.

- 7.73 In absolute (height Above Ordnance Data) terms, the residential block of No.1 The Leas would be 0.45m lower than the top part of the proposed building, excepting the two locations accommodating the additional height for the lift shafts, where it would be 1.05m lower.

- 7.74 Pavement level is measured at 39.46m AOD on the footway immediately adjacent to the tower of No.1 The Leas. This gives a tower height of 36.74m above pavement level, and the residential block 31.64m above pavement level.

- 7.75 Pavement level immediately outside the Pavilion central steps onto The Leas is 40.2m AOD (interpreting between two levels taken either side). This gives the height of the proposed Leas Pavilion residential building above pavement level as 31.35m, rising to 31.95m at the top of the lift shafts.

- 7.76 The proposed development would introduce a large new building into an urban space that was created in 1995 by the demolition of former buildings on the site. It would be taller than the original buildings and would occupy more of the footprint of the urban block defined by the surrounding roads.

- 7.77 There is a consistency in the pattern of building heights along The Leas which contributes to its unified visual appearance. Carlton Leas, despite its 7 storeys, does not look out of place in terms of scale and massing because it is set back from the road and defines its curtilage with a low brick wall. Ceiling to floor heights are almost certainly lower than the adjacent historic terraces although this has not been substantiated.

- 7.78 In views east along The Leas the tower of No.1 The Leas would continue to form a visual 'full stop' but parts of the residential block and the western gable of Priors Leas would be hidden by the new building. Locating a relatively tall building here (relative to adjacent terraces) would be consistent with the townscape phenomenon of progressively taller buildings towards the commercial core of a town or city.

- 7.79 The site at present appears vacant and semi-derelict. The lack of a building on the site is at odds with the prevailing urban grain of The Leas and to fill the gap with a substantial building of high architectural quality such as proposed would have a beneficial effect.

Direct or indirect

- 7.80 Impacts on urban grain and building height will be **Direct**.

Short, medium or long-term duration

- 7.81 The duration of the impact will be **Short-term**. It is anticipated that the duration of construction works will be less than 5 years.

Permanent or temporary

- 7.82 The proposal is for the building to be **Permanent**. There is no intention for the site to revert to its current state at some stage in the future. Site access arrangements will be permanently changed.

Size / scale of change (Major, Moderate, Minor or Negligible)

- 7.83 Impact upon building heights would be **Major**. The proposal would involve the introduction of a new 9-storey building onto a site that currently supports very little built form above pavement level.
- 7.84 Impact upon urban grain will be **Moderate**. There will be no change in the footprint of the parcel of land on which the proposed building would be accommodated. The massing of the building is a departure from the terraced forms that front onto The Leas elsewhere. This is necessitated by the set-back required for the retention of the Pavilion.
- 7.85 Along Cheriton Place and Longford Terrace, the proposed building will reconstruct the former (pre 1995) street frontage, which is assessed as a beneficial effect.

Geographic extent (Site, Local, District, Regional)

- 7.86 Geographic extent of impacts upon urban grain and building height would be **Site** - changes in building height would be accommodated within the defined street pattern surrounding the site (NB townscape and visual effects are addressed separately). There would be no impacts on urban grain beyond the site boundary.

Magnitude of Change (High, Medium, Low, Negligible)

Medium - the proposed development would be of a moderate size and scale in terms of urban townscape, it would be noticeable / recognisable and impacts would be of a local extent.

Beneficial / Adverse / Neutral

- 7.87 Changes in urban grain and building height are assessed as **Beneficial**.

TOWNSCAPE CHARACTER*Folkestone Conservation Area Appraisal (CAA) - (2) West End of Folkestone and (1) The leas and seafront character areas***Nature of change**

- 7.88 The proposed development will introduce a new building of progressive and innovative architecture into a key gap site within the West End of Folkestone character area, adjacent to The Leas and Seafront character area.
- 7.89 It will also involve the restoration and bringing into community use one of Folkestone's most peculiar, iconic and popular buildings.
- 7.90 The new building will reconstruct the former street frontages of Longford Terrace and Cheriton Place.
- 7.91 The new building will be taller than surrounding terraces, and will be set against the aggressive or 'heroic' architecture of the former office block No.1 The Leas, softening the impact of the latter in the West End of Folkestone and Leas and Seafront townscape.
- 7.92 The design of the building has taken reference from the architectural proportions and detailing of nearby historic terraces and reinterpreted them in a modern idiom. The massing is designed to step back from street frontage above 5th floor to reflect traditional roof forms and to allow the scale of the building to sit comfortably with surrounding built form.
- 7.93 The concept design for the new building also takes reference from two historic landmark buildings located further west within the West End of Folkestone character area - the Metropole and Grand hotels. Reference is taken from the symmetrical elevational treatment of these buildings, the use of vertical 'tower' elements, and the horizontal layering effect particularly apparent at the Metropole where the top layer of accommodation is tiered back into the roof.
- 7.94 In terms of materials for the new building, the white stucco of the West End of Folkestone Victorian terraces will be interpreted through the use of light-coloured reconstituted stone.
- 7.95 The combination of these materials with the proposed glazed balconies and fenestration will generate a light and airy complexion to the elevations in keeping with the spaciousness and openness of the Leas and Seafront character, whilst maximising sea views.
- 7.96 The terracotta plinth for the new building will reflect the materials of the Pavilion itself, but presented in a form clearly distinct from the original stonework.

Direct or indirect

- 7.97 Impacts on the West End of Folkestone character area will be **Direct**. Impacts on the adjacent Leas and Seafront character area will be **Indirect**.

Short, medium or long-term duration

- 7.98 The duration of the impact on both character areas will be **Short-term**. It is anticipated that the duration of construction works will be less than 2 years.

Permanent or temporary

- 7.99 The proposal is for the building to be **Permanent**. There is no intention for the site to revert to its current state at some stage in the future.

Size / scale of change (Major, Moderate, Minor or Negligible)

- 7.100 Impacts upon the West End of Folkestone character area would be **Moderate**. The proposal would involve a substantial change to a single parcel of land, repairing a prominent townscape gap within the character area. The change would not affect the key characteristics of the wider character area.
- 7.101 Impacts upon the Leas and Seafront character would be **Moderate**. The proposal would involve a substantial change to a single parcel of land adjacent to the character area, repairing a prominent townscape visually prominent from The Leas. The change would not affect the key characteristics of the wider character area.

Geographic extent (Site, Local, District, Regional)

- 7.102 Geographic extent of impacts upon townscape characteristics of the West End of Folkestone and Leas and Seafront character areas would be **Local** - these are both sub-character areas of local extent, forming part the wider Conservation Area Assessment.

Magnitude of Change (High, Medium, Low, Negligible)

Medium - changes brought about by the proposed development would be of a moderate size and scale in terms of these character areas. They would be noticeable / recognisable and impacts would be of a local extent.

Beneficial / Adverse / Neutral

- 7.103 Changes to the West End of Folkestone and Leas and Seafront landscape character areas are assessed as **Beneficial**.

8. PRIVATE AMENITY

- 8.1 For most planning applications the potential impacts of a proposed development on private views is not a planning consideration. Private individuals do not have a right to a view and even if a new development significantly changes a view from a private property, this is not normally a ground on which planning permission can be refused.
- 8.2 Consideration of visual impacts of a proposed development is usually restricted to predicted impacts on public visual amenity or in heritage contexts the impact upon heritage significance (where the absence of public access to a viewpoint is not necessarily a material consideration).
- 8.3 The Landscape Institute released Technical Guidance Note 2/19 'Residential Visual Amenity Assessment (RVAA)' in March 2019. This sets out a methodology for assessing predicted impacts upon residential visual amenity.
- 8.4 A detailed assessment of residential visual amenity is beyond the scope of this townscape and visual appraisal, but the proposed development will increase the quantum and scale of built form on the site, and this will have impacts on the amenity of neighbouring residents. This is discussed below.
- 8.5 In terms of precedent much of the development proposed replicates the footprint of substantial historic development on the site, with the former buildings removed from the site in 1994/5 following fire and the granting of planning permission for a substantial residential scheme. In assessing potential impacts on amenity it is important to consider this historical context and the urban nature of the site.
- 8.6 Given its close proximity to Longford Terrace, Priors Leas and Whitecliffs it is considered that these are the buildings that are most likely to be impacted upon by the proposal. The proposed development would be approximately 46 metres from the west-facing residential flank of No. 1 The Leas and whilst impeding long range views along The Leas to the west from accommodation within this building such views are not a material planning consideration.
- 8.7 Both Priors Leas and Whitecliffs are lower than the proposed new structure. These buildings are also lower than the predominant built form of the locality, including the taller historic terraces. The proposed building would be set back from the Leas frontage to display the Pavilion, and stepped back above 5th floor, and despite its overall height the lightness of the elevational treatment of the architecture, and choice of materials would not be overbearing or oppressive to the adjacent buildings. The principal southerly (sea-facing) aspects of Whitecliffs and Priors Leas would be unaffected by the proposed development.
- 8.8 To the rear (north) of the site are a number of buildings aspected onto Sandgate Road. These are typically 3 to 4 storeys in height with single storey extensions, car parking and outbuildings to the rear.
- 8.9 The nearest property to the northern elevation of the proposed development is Rostrum House, a two storey curved building of rendered masonry and flat roof at the junction of Cheriton Place and Longford Way. This building has the majority of its windows on its western elevation, with no windows to principal rooms to the southern elevation facing the proposed development. Any views from this building, direct or oblique, are currently poor-quality views of a surface car park. The proposed new building would replace views of the road and car park from south-facing windows of this property.
- 8.10 To the eastern elevation of the development the scheme adjoins number 4 Longford Terrace which is 6 storey end of terrace (including basement and roofspace). The design of the proposed development seeks to take reference from the detailing of Longford Terrace, whose principal aspect and street access is east - onto the terrace itself. The rear, western elevations of these properties currently have views along Longford Way and across the appraisal site, currently surface car parks. The massing of the proposed building has been designed to provide separation between the western elevations of Longford Terrace and the eastern elevation of the western wing of the new building. Although the new building will obstruct views of The Leas and the coast from the west-facing elevations, the bay windows in the eastern elevations will continue to provide oblique views south along Longford Terrace.
- 8.11 Whitecliffs, to the west of the application site comprises four storeys of flats, with balconies and principal elevations to the south. There are no principal windows to the eastern elevation of this property facing the appraisal site, and this elevation appears to have. A wrap-around and largely enclosed balcony to the second floor accommodation provides protected amenity space in addition to that provided at the front and rear of the property. The proposed building's western elevation includes primary windows which would overlook the eastern elevation of Whitecliffs, but as the principal aspect of Whitecliffs is to the south this impact is not substantial. Evidence from postcard photos (The Leas in 1970) shows Whitecliffs in the context of the large hotel building on the other side of Cheriton Place, and it is clear that the eastern elevation of Whitecliffs was designed not to engage or address the building opposite.
- 8.12 Unlike Whitecliffs, the flats to Priors Leas to the east of the site do contain a number of windows to the west-facing elevation. Whilst the main elevations face The Leas, there are further windows and balconies to the rear (north), and the end flats have small bay windows to the western side serving bedrooms, and other secondary windows in this elevation. The sea-facing front balconies at ground, first and second floors partially wrap around the western elevation.
- 8.13 The proposed development would be positioned directly opposite this elevation on the other side of Longford Terrace separated by the road and footways either side. The eastern elevation of the proposed development includes principal windows, with external balconies turning the corner onto The Leas frontage. The proposed development will therefore generate some intervisibility between occupants and residents in Priors Leas and those of the new development. This level of interaction would not be unexpected in a dense urban context such as this. In its historical context, as described for Whitecliffs above, the previous development on the appraisal site, which preceded the building of Priors Leas, included primary windows in its eastern elevation.
- 8.14 The Landscape Institute's Technical Guidance Note 2/19 states:
'It is not uncommon for significant adverse effects on views and visual amenity to be experienced by people at their place of residence as a result of introducing a new development into the landscape. In itself this does not necessarily cause particular planning concern. However, there are situations where the effect on the outlook / visual amenity of a residential property is so great that it is not generally considered to be in the public interest to permit such conditions to occur where they did not exist before.'
- 8.15 Whilst the proposed development will therefore bring about some adverse impacts on residential visual amenity, there will also be beneficial impacts, such as the removal of the surface car parks and signage, and an improvement in the appearance (and functionality) of the Pavilion. In conclusion, this is not a situation where the 'public interest' threshold defined in the technical note above has been reached.

9. SUMMARY OF PREDICTED EFFECTS

Summary of construction phase townscape and visual effects

Receptor	Magnitude of change	Assessed effect
Visual resource	Medium	Adverse
Townscape	Medium	Adverse

Summary of operational phase townscape effects

Townscape receptor	Magnitude of change	Assessed effect
Topography and geology	Low	Neutral / Adverse
Land use and vegetation	Low	Beneficial
Public highways and PROW	Low	Neutral/Beneficial
Urban grain and building height	Medium	Beneficial
West End of Folkestone and The Leas and Seafront Character Areas	Medium	Beneficial

Summary of operational phase visual effects

Visual receptor	Magnitude of change	Assessed effect
View 1	Low	Beneficial
View 2	Medium	Beneficial
View 3	High	Beneficial
View 4	Medium	Beneficial
View 5	High	Beneficial
View 6	High	Beneficial
View 7	Medium	Beneficial
View 8	Medium	Beneficial
View 9	Medium	Beneficial
View 10	Medium	Beneficial
View 11	Low	Neutral
View 12	Low	Neutral
View 13	Low	Neutral

10. CUMULATIVE EFFECTS: NEARBY DEVELOPMENT PROPOSALS

- 10.1 Folkestone and Hythe Council Local Plan - Places and Policies Submission Draft identifies the two car park sites either side of the Marine Crescent as potential allocations for residential development.
- 10.2 The Rotunda Car Park is approximately 1.02ha and extends east from the Leas Lift to Marine Crescent. The site is raised approximately one metre above its surroundings and slopes gently from its northern boundary at the bottom of the cliff beneath the Road of Remembrance, south toward Lower Sandgate Road.
- 10.3 The Marine Parade Car and Coach Park is situated 100m further east and amounts to an area of 0.7ha.
- 10.4 The Submission Draft states:(5.22) *'The site's proximity to Folkestone Town Centre means that there would be access to a range of shops, services, transport links and employment opportunities making it well-suited for residential use. The Coastal Park to the west also provides excellent access to public open space.'*
- 10.5 *'In respect of key constraints, both car parks are situated within the Folkestone Leas and Bayle Conservation Area, close to or adjoining a series of Listed Buildings and within an area of archaeological potential. At present, based on the low contribution the sites currently make to the setting of these assets, built heritage does not represent an overriding constraint on development. However any development must preserve or enhance the characters and settings of these important assets; of particular note is the adjacent Grade II* Leas Lift. The Lift closed to the public in January 2017 following a report by the Heath and Safety Executive, which concluded that the type of braking system the lift uses was said to be "unreliable and prone to failure". Appropriate and proportionate contributions will be sought in order to secure a sustainable future for the lift and its role in improving connections to the town centre. Finally, the Rotunda Car Park site is directly adjacent to a Biodiversity Action Plan Priority Habitat (deciduous woodland). Therefore, development should be informed by an assessment to identify features of ecological interest and seek to conserve and enhance biodiversity within the site.*

'Both sites are well served by pedestrian and cycle links to Folkestone Town Centre, by the cliff pathways between the Road of Remembrance, Lower Sandgate Road, the seafront and harbour. Core Strategy Policy CSD6: Central Folkestone Strategy requires development within the policy area to contribute towards the enhancement of these existing routes. In addition, the Council is also keen to re-establish the disused cliff pathway running behind the Rotunda Car Park linking to the Leas Lift.'

POLICY UA2

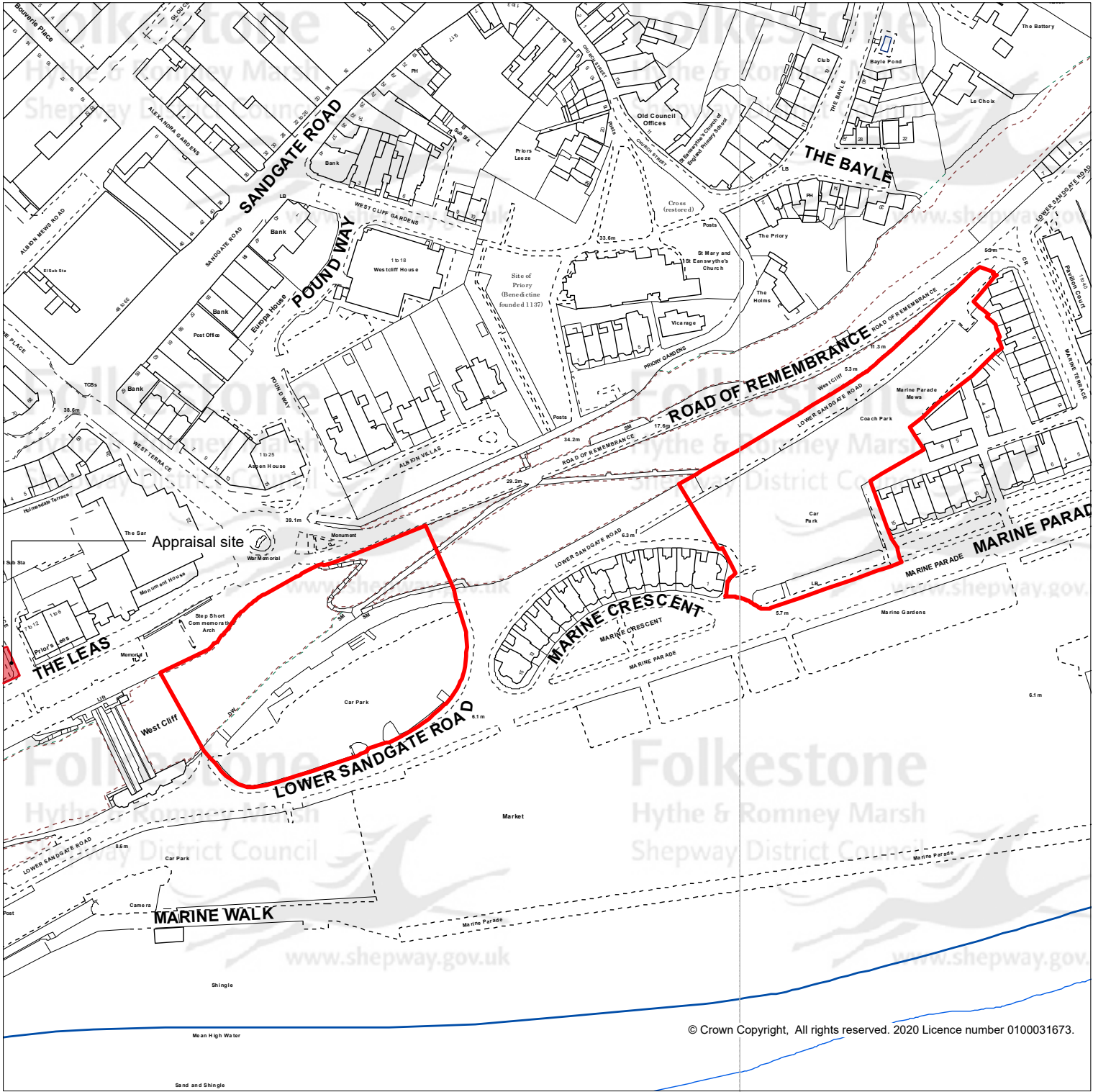
'The Rotunda Car Park is allocated for residential development with an estimated capacity of 50 dwellings and the Marine Car and Coach Park is allocated for residential development with an estimated capacity of 65 dwellings.

Development proposals will be supported where:

- The design and layout of any new buildings improves and enhances connectivity between the seafront and Folkestone Town Centre;
- Appropriate and proportionate contributions are made in relation to improvements to connectivity between the seafront and Folkestone Town Centre; a portion of which should be set aside as a payment towards the restoration and/or upgrade of the Leas Lift, or sinking fund for its ongoing maintenance, if required, through a Section 106 agreement;
- The existing accesses are retained with new emergency access provided through Lower Sandgate Road;
- The scale, design and layout of any new buildings preserve or enhance the character and setting of nearby heritage assets including the Folkestone Leas and Bayle Conservation Area and nearby Listed Buildings;
- Mitigation and enhancement measures are incorporated into the design to minimise effects on the local Biodiversity Action Plan Priority Habitat;
- Any potential contamination from former uses is investigated, assessed and if appropriate, mitigated as part of the development;
- Access is maintained to the existing underground sewerage infrastructure for maintenance and up-sizing purposes; and
- The archaeological potential of the land is properly considered and appropriate archaeological mitigation measures are put in place.
- Picture 5.3 Rotunda and Marine Parade Car Parks, Lower Sandgate Road, Folkestone.'

- 10.6 It is clear that should these sites be built out, they would impact upon views and townscape, particularly when viewed from the south east (shore and harbour area). From within the Marina Car and Coach Park and Rotunda sites themselves there is little intervisibility with the Leas Pavilion site due to the position of No.1 The Leas and the blind zone created by the cliff.
- 10.7 In combination with the Leas Pavilion proposal the development of these two sites would represent an increase in the quantum of built form within these views, although physically and visually separated vertically by the cliff.
- 10.8 Similar to the Leas Pavilion site, these are both tarmac car parks which detract from townscape / seascape quality. Subject to quality of design, their development is likely to be beneficial in townscape and visual terms.

Fig. 42: POLICY UA2 (plan indicating UA2 allocations relative to the appraisal site)



Appraisal site boundary

11. SUMMARY AND CONCLUSIONS

Townscape character

11.1 Townscape and visual character are often strongly interrelated. The distinctive townscape character of this part of Folkestone is derived from its buildings, spaces and views, and in particular the following components:

- The architecture and landscape of the Leas itself with its strong linear form, broad open spaces and seaside character, including simple but characteristic esplanade features such as seats, ornate lighting columns, hoop-top railings, bedding displays (near the Leas Cliff Hall), the bandstand beyond, colourful planting associated with some of the terraces, and occasional pine trees and other vegetation rising above the cliff edge, framing views out across the Channel.
- Buildings generally arranged in a grid aligned with the seafront and Sandgate Road, generally 3-4 storeys, occasionally with accommodation in roof, and a 7-storey late 20th century apartment block close to the Leas Cliff Hall.
- Elegant historic stucco terraces juxtaposed with late 20th century architecture.
- Later (20th century) buildings in brick, glass and concrete.
- Unique and surprising individual elements, such as the Step Short Memorial Arch and commemorative garden, the Leas Lift (not operational but still making a visible contribution to The Leas), the peculiar witches hat architecture of the modern entrance to the Leas Cliff Hall and the Leas Pavilion itself, with its golden terracotta detailing oddly set below the level of the pavement.
- Traditional High Street (Sandgate Road) running parallel to The Leas providing retail and services, with occasional framed views through to the seafront from intersecting streets.
- Poor quality urban spaces, generally occupied by car parking between the seafront architecture of The Leas and the rear of properties on Sandgate Rd.
- Architectural anomalies, such as the public conveniences accommodated within a former house, with a garden to the rear.
- A general lack of mature trees on the exposed part of The Leas, but with vegetation cover / interest concentrated along the cliff.
- Delightful and distinctive Victorian / Edwardian seaside character still present and highly evocative of the town's fashionable past.

Visual character

11.2 Visual character is derived from the following:

- Open sea views, and big skies, but not necessarily views of the shore. In some views from The Leas the shore is not visible as it is set below the level of the cliff and the vegetation it supports. From the taller buildings there are more expansive views of the harbour and shore.
- Views of the sea and coast disappear quickly inland, interrupted by intervening buildings.
- Long, almost uninterrupted views to the west, flanked by the white elevations of hotels and more recent brick / concrete / glass residential terraces.
- Views inland are highly restricted by the terraces along the northern flank of the Leas, but where there are designed views - almost exclusively to the west of the Leas Pavilion site - they are spectacular (Clifton / Langhorne Gardens; Clifton Crescent).
- Most views to the east are terminated by the massive flank and tower of No.1 The Leas., and correspondingly, views from the Old Town and eastern parts of Folkestone towards the site are obstructed by the same building mass.
- Views towards The Leas from the harbour, running along the Lower Sandgate Road and coastal path are largely hidden by the cliff face and the vegetation on it, but No. 1 The Leas is still prominent in many of these views, rising dramatically above the trees.
- Distant views over Folkestone from elevated positions such as Crete Rd East and Crete Rd west provide expansive panoramas over the urban area to the sea. At this distance of 3 - 3.5 km the general urban form is more apparent in views than individual buildings. Nevertheless, on the horizon against the backdrop of the sea, the distinctive profiles of the Grand and Metropole Hotels can be made out to the west, No.1 The Leas to the east, and the spire of the Holy Trinity Church between. From Crete Rd East views take in more of the harbour area, including the Burstin Hotel.

Townscape and visual condition

11.3 The condition of the townscape and the views of The Leas is good, with buildings and landscape appearing to be well maintained.

11.4 The townscape and visual condition of the area in the immediate vicinity of the appraisal site has deteriorated with the disrepair of the Leas Pavilion and the introduction of parking onto the sites of the demolished buildings either side, giving the impression of an gap in the townscape waiting to be repaired.

Townscape and visual sensitivity

11.5 Issues relating to sensitivity, susceptibility and value are not normally addressed in detail in a non-EIA townscape assessment. In this instance, some reference is made to these elements, simply because the site and the project are quite unique, and the sensitivity of the townscape and views is high - it is valued by people and by the community. People come to Folkestone to walk along The Leas specifically because it possesses beautiful buildings, high quality landscape, stunning views and bracing sea air. They also come to experience the time-line back to fashionable and opulent late 19th century Folkestone, and a traditional seaside ambiance. People walking The Leas, sitting on its benches, and visiting the coastal park contribute to its animation.

11.6 The sensitivity and value of the townscape is recognised through its Conservation Area status, and the presence of a number of listed buildings nearby, including the Leas Pavilion itself on the site.

11.7 Susceptibility - a component of sensitivity - relates to the capability of a given site to accommodate the type of development proposed. This includes consideration of relevant historical context, so the fact that the site until the mid 1990's accommodated sizable residential / hotel buildings either side of the pavilion is of relevance. Similarly, the expired planning permission for a similar architectural concept to the current proposal is also a material consideration, as this proposal went through the democratic process and could have been built. These nuances have the effect of lowering the susceptibility of the site to development of the kind proposed, meaning that it increases the capability of the site to accommodate the development without undue harm.

ASSESSED EFFECT

11.8 TVA methodology requires the assessor to make a judgement as to whether a change is 'adverse,' 'neutral' or 'beneficial.' This can be a challenging exercise. There can be a natural tendency amongst the general public and local residents in particular to resist change in a landscape or townscape with which they are familiar, even if the quality of that environment is not particularly high. It is special to them as individuals and as part of a community.

11.9 As a result it is quite commonplace for any change, including change brought about by a development proposal, to be considered adverse, whatever its nature or scale. Whilst the assessor's role is to adopt a professional / impartial stance, it is important to be mindful of this natural conservatism.

Townscape

11.10 With regards to assessed effects on townscape, in almost every respect the proposal is assessed as 'Beneficial.' The main reasons for this are summarised as follows:

- The introduction of high quality landmark architecture responding to / respecting the sensitive Conservation Area setting, and that of nearby listed buildings, taking full advantage of its spectacular location and views of the sea.
- Reconstruction of damaged townscape, removing the surface car parks and filling an unattractive gap in the urban form of The Leas and West End of Folkestone.
- Restoration of an iconic, peculiar and much-loved listed building, and its integration with the architecture of the new building, bringing it back into public use.

11.11 In addition, effects on heritage assets have been assessed independently as on balance beneficial. The heritage statement (April 2020) states: *'While some aspects of the proposals may result in harm to the significance of the Leas Pavilion (commensurate with a medium level of less than substantial harm in NPPF terms), there are considerable heritage public benefits (in accordance with paragraph 020 of the PPG) which would weigh against this.'*

11.12 It goes on to conclude: *'Considered holistically, the proposals are found to preserve and enhance significance of the grade II Leas Pavilion and conservation area and result in minor enhancement to the significance of the nearby grade II* listed Leas Lift through an enhancement of its group value with the pavilion.'*

Public visual resource

11.13 The visual effects that would be brought about by the new building would be variable. Immediately adjacent to the site, viewed from The Leas and the streets surrounding the site, the magnitude of change brought about by the new building would be substantial. Moving away from these streets, very quickly the site and the new building on it would be hidden, mainly by other buildings. This is especially the case to the north and east.

11.14 By contrast the openness of the landscape / seascape to the south of the site means the building's Zone of Theoretical Visibility is far more extensive, save for a 'blind zone' under the cliff. From these vantage points (land-based and from the sea), the new building would be perceived as a sculptural element rising above the cliff, adjacent to No.1 The Leas, but as a very different form of architecture. Receptors of sea-based views, of course, would be fewer than land-based receptors. Furthermore, two substantial sites either side of Marine Crescent are allocated for residential development, and viewed from the shore, once built these are likely to have a far greater visual impact than the proposed development at the Leas Pavilion site.

11.15 There is no inherent visual unpleasantness attached to the development proposal itself. The scheme will be designed, executed and maintained to a high standard, controlled through normal planning mechanisms. Impacts would derive from a change in visual character, from a relatively open, visually unattractive previously developed site, to one that is developed to a high architectural standard.

11.16 Impacts on distant views from the Kent Downs AONB would be apparent but negligible and neutral in effect.

Private visual amenity

11.17 There is the potential for limited local scale impacts upon visual amenity from a small number of residential properties located close to the site. Whilst the new building would obstruct some existing views, many of these views are of poor quality (surface car parks and derelict Leas Pavilion).

11.18 Similarly there is potential for intervisibility between existing and new properties, which can be expected in a dense urban environment, and the buildings most affected once had the same degree (or more) of interaction with former buildings since demolished.

MITIGATION

11.19 Mitigation is described in terms of primary, secondary and tertiary.

- Primary mitigation is embedded in the design of a given proposal, to address anticipated (adverse) impacts identified during the design process.
- Secondary mitigation is introduced in situations where primary mitigation has not fully addressed predicted adverse impacts and is often secured through planning conditions or obligations.
- Tertiary mitigation might be imposed as a result of legislative requirements and/or standard practice, to avoid theoretical impacts.

11.20 In the case of the Leas Pavilion proposal, virtually all mitigation is Primary in nature as it is embedded in the design of the new building. Primary mitigation measures would include:

- Sensitive design and massing of the building in its townscape and historical context, such as referencing local historic architectural precedent, or stepping back of the architecture above 5th floor.
- Appropriate use and detailing of materials (such as use of terracotta coloured reconstituted stone for the plinth, or light-coloured materials for balconies and elevations).
- Restoration of the Leas Pavilion main hall, and making it available for public use.
- Introduction of green roofs.
- Introduction of measures to improve site biodiversity.

11.21 Embedded Primary mitigation has developed throughout the design process, involving key inputs from the client and specialist technical advisors. It is also derived from involvement of the local planning authority and their specialist advisors in pre-application meetings which have guided the design of the development proposal, and from engagement with the local community.

11.22 Secondary mitigation might be introduced through planning conditions that would relate to approval of architectural materials, approval of planting designs for the site and the green roofs, long term management of green roofs and external landscape spaces, management and maintenance plans for the pavilion, adoption of Considerate Constructor's scheme or similar for the construction phase, and so on.

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- 11.23 Tertiary mitigation will again be embedded in the design of the building, and would include considerations such as specification to British Standards and Codes of Practice, and compliance with building regulations and DDA requirements.

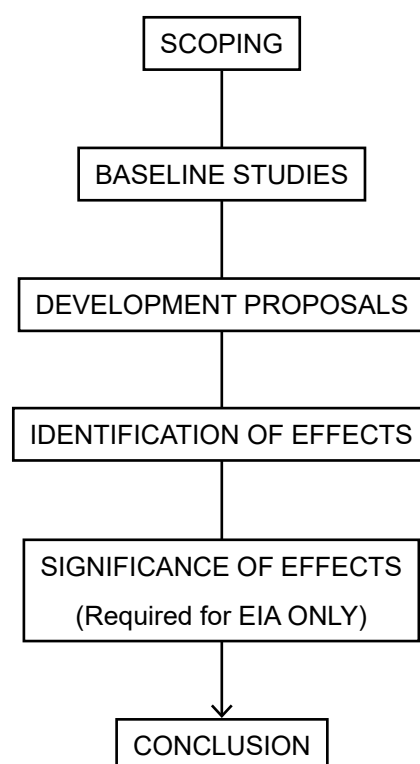
CONCLUSION

- 11.24 At present the site forms an unattractive gap in the conservation area, with original buildings forming the historic pattern of development having been removed in the mid-1990's.
- 11.25 It is assessed that the proposed development is an appropriate land use for the site, and its design, scale, massing and choice of materials respects the character and appearance of the conservation area and is not of detriment to the setting of nearby listed buildings. In this the proposal is compliant with national and local planning policies aimed at protecting and enhancing townscape and visual resources, including the historic environment.
- 11.26 The listed Leas Pavillion is in a poor state of repair and requires extensive structural and decorative restoration work. The redevelopment of the site will result in significant improvements to the fabric of the listed building, enhancing the prominent southern façade and ensuring it is retained for community use and managed for future generations.
- 11.27 Overall, the assessed effect on townscape that would be brought about by the proposed development is Beneficial.
- 11.28 Overall, the assessed effect on views that would be brought about by the proposed development is Beneficial.
- 11.29 No further mitigation is recommended, other than by routine design and management control measures available, delivered and enforced through normal planning mechanisms.
- 11.30 For the above reasons this townscape and visual appraisal concludes that the site has a high capacity to accommodate a development of the type proposed.

12. APPENDIX 1: METHODOLOGY

ASSESSMENT METHODOLOGY

- 12.1 The diagram below indicates the usual process followed in undertaking landscape / townscape and visual appraisal work. The 'Significance of Effects' section is only undertaken for assessments requiring a Landscape and Visual Impact Assessment (LVIA) or Townscape and Visual Impact Assessment (TVIA) for the purposes of Environmental Impact Assessment (EIA).



ASSESSMENT TABLES & MATRICES

- 12.2 To assist with the assessment process a number of standard tables and matrices are provided in **Tables A to I** within this methodology.
- 12.3 These tables are intended as an initial guide to enable the assessor to consistently identify a common starting point or value against which to assess individual aspects of a specific project. They contain generic classifications relating primarily to townscape character and views, upon which site specific judgements and descriptions can be formulated.
- 12.4 There are often instances where dynamic values can fall between categories set out in the tables / matrices, requiring the assessor to use professional judgement in reaching a conclusion, supported by explanatory text.

SCOPING

- 12.5 The purpose of the preliminary scoping exercise is to:
- Define the extent of the study area.
 - Identify the relevant sources of townscape and visual information.
 - Identify the nature of possible impacts, in particular those which are considered likely to occur and to be relevant to this assessment.
 - Identify the main receptors of the potential townscape and visual effects.
 - Establish the extent and appropriate level of detail required for the baseline studies, including identifying those issues which can be 'scoped out' from further assessment.
- 12.6 The scoping exercise is completed by undertaking a preliminary desktop study of the site, its immediate surroundings and the proposed scheme, to identify possible impacts and effects.

Establishing the Study Area

- 12.7 In determining an appropriate study area for assessment, it is important to distinguish between the study of the physical townscape and the study of visual amenity. The study area required for analysis of the physical townscape is focused on the immediate locality of the identified site, but must include sufficient area to place the site into its wider townscape context.
- 12.8 The study area for the visual assessment extends to the whole of the area from which the site is visible and/or the proposed development would be visible.

Scoping Out

- 12.9 Directive 2014/52/EU states that the emphasis of LVIA should be on identification of the likely "Significant" environmental effects and the need for an approach that is appropriate and proportional to the scale of the project being assessed.
- 12.10 Only topics and issues which are relevant should be included within the assessment. This approach is also considered to remain appropriate for non EIA projects.
- 12.11 It may therefore be appropriate to 'scope out' certain topics and effects from the outset, on the grounds that they are not significant or are disproportionate for the following reasons:

- The topic or issue is not present within the defined study area or is at a sufficient distance away from the site of the proposal, that it can be readily accepted that there would be no potential for any impact or change to occur.
- Although the proposal would result in an impact or change upon a topic or issue, the change is considered to be of an insignificant scale compared to the size and scale of the topic being affected. An example would be the effect that a small domestic development might have on a National Character Area.

BASELINE STUDIES

- 12.12 The purpose of baseline studies is to establish the existing townscape and visual conditions against which the proposal will be assessed, and to develop an understanding of townscape and visual context.
- 12.13 In terms of visual amenity, the baseline study will establish the area from which the development may be visible, the different groups of people (receptors) who may experience views and the location and nature of existing views.

Desktop Study

- 12.14 The first stage of the baseline work is a desktop study of relevant available background information relating to the site and its surroundings.
- 12.15 Principal sources of such information include:
- The local planning authority, including the local plan / policy context.
 - Existing National, Regional, District and Local Townscape Character Area Assessments.
 - Statutory consultants including Historic England and the Environment Agency.
 - Online national and regional mapping resources.

12.16 Typical baseline information may include:

- Aerial imagery.
- Topography.
- Land cover / land use
- Landscape / townscape protection and policy designations.
- Historic context and features.
- Land use.
- Public rights of way.
- Existing evaluation and assessment studies.

Field Study

12.17 Information collated in the desktop study is then checked and confirmed by direct field observations, particularly in urban and urban fringe areas where maps and aerial data can be out of date, or difficult to interpret.

The role of existing Landscape / Townscape Character Area Assessments

12.18 Landscape and townscape character assessments have been carried out by a number of authorities at a range of scales, from National and Regional, down to District and Local levels.

12.19 Existing assessments provide useful background material for townscape assessment work. It is important that these are reviewed critically before use, to ensure that they are accurate, current and relevant to the assessment process in hand. National or regional character assessments are at too large a scale to be of real benefit in assessing local or district scale development projects, and often site-specific characteristics are 'washed over' by the more general, prevailing characteristics of a given character area.

12.20 It may sometimes be necessary to rule out or otherwise interpret the content of existing character assessments and their findings, especially if baseline conditions at the site-specific level are at variance with the broader townscape character classification.

Visual Amenity Assessment

12.21 Baseline analysis of visual conditions provides a description of the prevailing visual characteristics and visual amenity of the study area townscape.

12.22 The visual baseline also identifies the different groups of people who may experience views of the development, the locations where these views will be experienced, and the nature of the existing view at these points.

Zone of Theoretical Visibility

12.23 For some projects, where a precise layout and building designs are finalised and known, visual baseline conditions can be established by identifying the area from which a proposal, theoretically, will be visible. This can be established by producing a 'Zone of Theoretical Visibility' (ZTV) using specialist software packages and survey data, or through traditional manual mapping.

12.24 In many situations, however, it is not possible to establish a reliable ZTV on these methods alone, due to anomalies caused by the presence of existing built development and vegetation cover within the study area, or due to the fact that development proposals for a given site are not finalised (for an outline planning application, for example, or for a call for sites exercise). In these circumstances professional judgement, desktop analysis and fieldwork are used to establish representative viewpoints.

Height of the Observer

12.25 For the purposes of the production of ZTVs, site surveys and baseline photography, it has been assumed that (unless stated otherwise) the observer eye height is between 1.5 to 1.7m above ground level, based upon the mid-point of average heights for men and women.

Identifying Potential Visual Receptors

12.26 If the physical nature, dimensions and location of the proposed development has been established, it is possible to identify the type of visual receptor(s) who would be affected. This could be a wide range of people including those living in the area, those who work there and those who are passing through en route to a different destination. There may also be people visiting specific attractions and locations, or those engaged in a recreational activity.

12.27 These receptors will experience the townscape setting in different ways, depending on the context (location, time of day, season, degree of exposure), and the purpose of the activity they are undertaking (recreation, residence, employment or journey).

12.28 Visual receptors can be described in terms of their relative sensitivity to change. Receptors who experience views from public rights of way, or from within Areas of Outstanding Natural Beauty, are more likely to be sensitive to changes in that view than people experiencing a view from, say, within a moving vehicle.

12.29 Similarly, sensitivity of the receptor might be reduced if the visual amenity of the available view is low. This might be due to the nature of activity being undertaken at the location, or by the receptor (such as views from, or in close proximity to, areas of active recreation, major transport interchanges, major roads and railway lines and places of work or employment). This may also be due to the nature or quality of the available view and its setting (such as views from locations in close proximity to major detracting visual features, such as damaged or derelict land or buildings).

12.30 The least sensitive receptors are locations with very low, or no existing visual amenity, due to lack of available publicly accessible views, or where the setting or view is damaged or adversely affected by detracting visual features within the townscape.

12.31 These also include long distance views where the introduction of new development into the view is unlikely to alter its overall nature, character or emphasis.

Selecting Key Viewpoint Locations

12.32 From the preliminary desktop studies it is possible to identify key locations within the study area, which have the potential to provide views of the proposed development.

12.33 Following verification on site, viewpoints that characterise the views of the proposed development and those which are of particular relevance in terms of their location or with particular features of importance or sensitivity, are selected.

Representative views

12.34 The approach to visual assessment requires that assessed views are representative of the wider general viewing experience. It is not necessary to select views from all positions from where the site / proposed development would be visible.

12.35 In selecting the final representative viewpoints consideration has therefore been given to:

- Public accessibility.
- Number and sensitivity of viewers.
- Viewing direction, distance and elevation.

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- Nature of the viewing experience (static, moving).
- Type of view (panoramic, vista, glimpsed).

Baseline Photography

12.36 The camera used was a digital Panasonic Lumix DMC-FZ50 using a 50mm lens. The images include panoramic images and single frame views. The photography is intended to provide a representation of the view from selected viewpoints. It is not intended to represent what the human eye actually sees, and is therefore not a substitute for visiting the site and experiencing the view in person.

Panoramic Photography & Stitching

12.37 Panoramic images are best stitched when sufficient overlap between the images is provided. Therefore a 1/2 overlap of each picture was allowed for. The panoramic images were taken using the camera's built in guidelines on the display. The guidelines divide the picture into thirds, both vertically, horizontally and diagonally to clearly identify the centre point of the image.

12.38 Panoramic images were stitched together using the automated 'photomerge' facility in Adobe Photoshop (Creative Cloud). The 'cylindrical' setting was used, so that the software initially aligns the images by comparing the duplicated elements between them, and then allows for focal distortion associated with single frame 50mm photographs. The 'auto blend' setting was selected to enable the production of a seamless single image. During this process the software determines the best line for the join between the separate images and adjusts the overall brightness of the individual images to produce a consistent appearance.

IDENTIFICATION OF EFFECTS

12.39 The purpose of this section of the report is to describe the potential effects that may result from the proposed development upon landscape and visual resources.

12.40 There is no prescribed formula to establish the likely significant effects that may result from a proposed development. This process takes systematic analysis of the range of possible interactions between components of the proposed development throughout its lifecycle, and the baseline landscape and visual resource.

Nature of Change (Magnitude of Impact)

12.41 Potential impacts are identified by describing the change to the baseline situation of individual landscape or visual receptors resulting from the different components of the development. These can include the following:

- A change in and / or partial, or complete loss of elements, features or aesthetic aspects that contribute to the landscape or visual character.
- The addition of new elements or features that will influence character.
- The combined effects of the above on overall character.

12.42 The nature of any identified impact is considered in terms of whether it is:

- Direct / Indirect or Secondary.
- Short / Medium or Long-term in duration.
- Permanent or Temporary.
- Beneficial / Adverse, or Neutral.

Establishing Magnitude

12.43 The consideration of the 'magnitude' of each identified impact will include:

- Size / scale.
- Geographic extent.
- Duration / reversibility.

Size / Scale

12.44 A judgement is made on the size or scale of the change that will occur. It takes into account:

- The extent of existing landscape elements that will be lost, the proportion of the total extent that these represent and the contribution this makes to the character of the landscape or view.
- The extent of the view that would be occupied by the proposed development (glimpsed, partial or full) and the proportion of the proposed development that would be visible.
- The degree to which the aesthetic or perceptual aspects of the landscape or view are altered by the removal, or addition of certain features. A judgement is also made as to whether the proposed development contrasts in form or character with its surroundings, and / or whether the development appears as an extension or addition to the original context of the view.
- Whether or not the impact changes the key characteristics of the receiving landscape.
- The rapidity of the process of change in the landscape or view.

Geographic Extent

12.45 The area over which the effect will be felt is identified on a four point scale of:

- **Site.** Within the development itself.
- **Local.** Within the immediate setting of the site.
- **District.** Within the landscape type / character area in which the proposal lies.
- **Regional.** Within the immediate landscape type / character area in which the proposal lies, and those immediately adjoining it.

Duration & Reversibility

12.46 The duration of the period over which the effect will occur is defined using a three point scale of:

- **Short-term** (0-2yrs).
- **Medium-term** (3-5yrs).
- **Long-term** (6+ years).

12.47 The reversibility is defined on a two point scale:

- **Permanent** (change cannot be reversed, or there is no intention that it will be reversed).
- **Temporary** (change has a defined life span and will, or can be reversed on cessation).

Factors which influence Visual Magnitude

12.48 In relation to visual amenity and when determining size / scale, geographic extent and duration, it is also necessary to consider the following variables, which can influence how a change to a view can be perceived or observed:

- **Elevation and distance.** The distance and angle of view of the viewpoint from the proposed development, and how this may affect a receptor's ability to identify the development within the view.
- **Exposure.** The duration and nature of the view (fragmented, glimpsed, intermittent or continuous).
- **Prominence.** Whether or not the view would focus on the proposed development. For example, where a building would effectively create a landmark, or the view is directed towards a building by the landscape framework, or the development forms one element in a panoramic view.
- **Weather conditions / aspect.** The effect of the prevailing weather conditions at a given location, the clarity of the atmosphere or the angle and direction of the sun and how this impacts upon visibility.
- **Seasonal variation.** Changes in seasonal weather conditions and vegetation cover will alter the extent of visibility of a development within a given view. This will in turn, influence factors such as the perceived size, scale, exposure and prominence.

Lighting

12.49 The night-time effects of artificial lighting are not assessed in this report. It is assumed that, as part of the detailed design phase for the proposed development, best practice principles would be adopted to minimise adverse impacts of lighting and light spillage from the proposed development.

Magnitude of Change

12.50 The above factors are then combined to define the nature, or ‘magnitude’ of change, using a three point scale of High, Medium or Low, as set out in **Table A**.

Table A: Magnitude of Change.

Value	Classification Criteria
High	A change of high magnitude will be generally consistent with the following criteria for a given development proposal: - It would be of a major size / scale, - It would be prominent / dominant, - It would be of a District to Regional extent,
Medium	A change of medium magnitude will be generally consistent with the following criteria for a given development proposal; - It would be of a moderate size / scale, - It would be noticeable / recognisable - It would be of a Local to District extent,
Low	A change of low magnitude will generally consistent with the following criteria for a given development proposal; - It would be of a minor size / scale, - It would be obscure / inconspicuous,

12.51 The reversibility and degree of permanence of a proposal will also influence magnitude of change. A reversible or temporary proposal is more likely to be within the ‘medium’ or ‘low’ categories than a permanent proposal, although this is not always the case.

Note on assessment judgements: Beneficial, Adverse or Neutral

- 12.52 LVA methodology requires the assessor to make a judgement as to whether a change is ‘adverse,’ ‘neutral’ or ‘beneficial.’
- 12.53 Predicted impacts on landscape character are equally important as visual impacts. Some assessors consider landscape impacts to be more important than visual.
- 12.54 This process considers a range of criteria that might include:
- The degree to which the proposed development is considered to be characteristic, or uncharacteristic of the receiving landscape or view.
 - The contribution that the development itself may make to the quality, condition and character of the landscape or visual resource.
- 12.55 This can be a challenging exercise, and the judgement will be based largely upon an individual’s perception and experience. There is a natural tendency for people to resist change in a landscape or townscape with which they are familiar, irrespective of the prevailing quality or condition of that environment. It is special to them as individuals and as part of a community, and in this respect it is valued. As a result it is quite commonplace for any change, including change brought about by a development proposal, to be considered adverse, whatever its nature or scale. Whilst the landscape assessor’s role is to adopt a professional / impartial stance, it is important to be mindful of this natural conservatism.
- 12.56 Quite often this is an ‘on balance’ judgement, where there are some adverse impacts predicted, and some beneficial. Sometimes it is necessary to qualify these, adding ‘major’ or ‘minor’ to ‘adverse’ or ‘beneficial.’ This may occur when an adverse impact is predicted, but through appropriate mitigation the residual effect might be reduced to minor adverse, neutral, minor beneficial or even beneficial.