

The impact of the proposed developments upon the setting and context of the identified heritage assets is assessed in light of the consideration of the identified heritage views and the effect of the development in each case to arrive at a conclusion as to the overall effect of the proposals. This gives particular consideration to the impacts upon key heritage assets (listed buildings and conservation areas) which may form part of the Site, exist in close proximity to it, or be frequently visible in a series of views in conjunction with the proposals.

Mitigation in respect of any adverse impact upon the setting, and / or the context of the identified listed buildings is formulated upon the overall benefits of the Proposed Development. Benefits relate to both the place in which the development will be constructed, as well as benefits to the wider community or society as a whole. Discussion of such benefits fall outside the scope of the Heritage Statement and are expounded in the Design and Access Statement (AisFor, 2024) and other reports submitted alongside this application.

8.1.3 Heritage impact on the Site

The Site does not contain any listed buildings, nor is it situated within any conservation area. While the proposals are expected to impact the settings of some listed buildings and the Folkestone Leas & Bayle Conservation Area (FLBCA), it should be noted that this impact would be indirect and has already been addressed in the Masterplan application. The impact of the proposals on the setting of the FLBCA is included in Section 8.4 below.

The Site, however, does feature non-designated historic assets, including the historic platform and associated facilities such as the Harbour Master's House, the Signal Control Box, and Customs House. Most of these facilities are intended to be retained and repurposed as part of the proposed scheme. The sole building slated for removal is the two-storey brick structure west of the Harbour Master's House, constructed in the 1970s according to the OS Map. This building (Electrical Sub-station; Harbour Approach Road), with minimal historic and architectural interest, was erected following the removal of the historic Platform 3, possibly serving the Harbour Station. The impact of proposals on non-designated heritage assets is included in Section 8.3 below.

8.2 Heritage Impact Assessment

Table 2: Impact on Heritage Assets

Number	Name	Grade/ Designation	Nature of impact on setting of the heritage asset	Overall impact on Heritage Asset
1	Folkestone Harbour Viaduct and Swing Bridge	Grade II	The proposed development would be located very close to this heritage asset, as the Harbour Viaduct and Swing Bridge lead directly to the site. Previous proposals (included as part of the overall masterplan) to the swing bridge have included repairs and conservation to the swing bridge and its conversion into a pedestrian route. This is complemented by appropriate landscaping design, which retains elements of significance. Associated heritage assets (non-designated) such as the Platforms, Signal Box, Harbour Master's House and Customs House have been retained and conserved as part of the scheme and are integrated within the proposed development. These works have secured the long-term viability and conservation of the heritage assets, as part of the wider harbour regeneration scheme. Although the proposals will have some impact on the heritage asset's visual setting, this would be in keeping with the evolving architectural and visual character of the Harbour, and the development will not harm the setting of the bridge. The visual impact of the development in conjunction with the East Pier is assessed in Views 7 and 8.	Negligible
2	East Pier, Folkestone Harbour	Grade II	The proposed development will impact the heritage asset's visual setting as it would introduce significant massing on the harbour, directly opposite the East Pier. The scale, heights and form of the massing significantly differs from the current built form on the harbour; but is in keeping with the evolving architectural and visual character of the harbour. The visual impact of the development in conjunction with the East Pier is assessed in view 6.	Negligible to Minor Adverse
3	Lighthouse at end of Folkestone Harbour Outer Pier	Grade II	The proposed development is located slightly away from the lighthouse and is within a distinct area (of the harbour as opposed to the harbour arm). Nevertheless, the proposals will be significantly taller than the lighthouse, and the proposed	Negligible to Minor Adverse

			development, which will be located between the lighthouse and the town, will screen views from the town, while dwarfing the lighthouse in views from the sea. The proposed development would therefore have an impact on the setting and significance of the lighthouse. This is somewhat mitigated by gaps within the proposed massing, allowing viewing corridors from the town towards the harbour. The visual impact of the development in conjunction with the East Pier is assessed in Views 10 and 16.	
4	The Life Boat Inn	Grade II	Whilst the wider setting of the pub includes North Street moving down to The Stade with the Harbour in the background, the impact of the proposed development is largely screened by existing built mass, coupled by the street orientation and topography of the area. Proposed development on the harbour will not have an impact on the setting of this listed building.	No impact
5	Church of St Peter, The Durlocks	Grade II	The proposed development would be screened in most public views of the Church taken from The Durlocks. Nevertheless, the visual link between the Church and the harbour would be affected by the proposed development, and this would impact its setting to some degree.	Negligible to Minor Adverse impact
6	St Andrews Hotel and Chapel, The Durlocks	Grade II	The building has been oriented such that windows face the Channel, but towards the Harbour Arm and not the harbour itself. The harbour therefore plays only an incidental part in the setting of this listed building; and the proposed development would not have an adverse impact on its setting.	Negligible to Minor Adverse impact
7	Leas Lift	Grade II*	The Grade II* listed Leas Lift is situated at some distance (approx. 600m) west of the Harbour. The harbour does not feature within the immediate or wider setting of the Lift, and the lift has historically been a connector between the western end of Marine Parade and The Leas. View 16 has been considered from near this area looking towards the proposed development on the Harbour and these have been assessed in the Visual Impact Assessment.	No impact

			The proposed development will have no impact on the setting of the Leas Lift.	
8	Marine Crescent	Grade II	The harbour is moreover screened from Marine Crescent due to the development of Plots A-E of the Folkestone Masterplan. Therefore, the harbour does not contribute to the listed building's setting. Due to the distance of this listed building from the proposed development on the harbour, the proposals will not affect the setting of Marine Crescent. View 2 of the visual impact assessment considers a conjunctive view incorporating the development as seen from near Marine Crescent.	No impact
9	10-15 Marine Parade	Grade II	The harbour does not form part of the direct or immediate setting of this listed building. The proposed development should therefore have no impact on the setting of these buildings. Nevertheless, Views 1 and 2 of the visual impact assessment include conjunctive views of these buildings and the site for assessment.	No impact
10	8 & 9 Marine Parade	Grade II		
11	4-7 Marine Parade	Grade II		
12	The Globe Inn	Grade II	The proposed development in the Harbour will not have any impact on the setting of heritage assets in The Bayle. The visual impact of the development from the Bayle is assessed in views 13 and 14.	No impact
13	The Battery	Grade II		
14	Statue in the Grounds of the Battery	Grade II		
15	The British Lion Inn	Grade II		
16	No. 12 The Bayle	Grade II		
17	No. 14 and No. 16 The Bayle	Grade II		
18	No. 18 The Bayle	Grade II		
19	No. 26 and No. 28 The Bayle	Grade II		
20	No. 30 and No. 32 The Bayle	Grade II		
21	The Parish Church of St Mary and St Eanswythe	Grade II*	The proposed development in the Harbour will not have any impact on the setting of heritage assets in The Bayle.	No impact

22	6 Bollards To North East Of Parish Church	Grade II	The visual impact of the development from the churchyard is assessed in view 14.	
23	Stone Cross In Churchyard of the Parish Church of St Mary and St Eanswythe	Grade II		
24	Sundial In Churchyard of The Parish Church of St Mary and St Eanswythe	Grade II		
25	Paving to Churchyard	Grade II		
26	3 Bollards to South of Parish Church	Grade II		
27	Folkestone Memorial Cairn	Grade-II	Neither memorial is particularly oriented towards the Channel, but when seen from West Terrace, both memorials benefit from the Channel as a background. The Harbour is located at a considerable distance (500m) to the east and at a different topographical level. It therefore does not contribute to the settings of either memorials.	No impact
28	Folkestone War Memorial	Grade II*	Consequently, the proposed development will have no impact on the settings of these heritage assets. The visual impact of the development in conjunction with the heritage assets is assessed in view 15.	
29	1 and 2 Albion Villas	Grade II	The Harbour is located at a distance away from these buildings, and physically screened from buildings along Albion Villas (private cul-de-sac). Due to these reasons, the Harbour plays no role in the setting of these listed buildings. Proposed development works on the Harbour would have no impact on the settings of these listed buildings. The visual impact of the development in conjunction with the heritage assets (seen in the background) is assessed in view 15.	No impact
30	3 and 4 Albion Villas	Grade II		
31	5 and 6 Albion Villas	Grade II		
Scheduled Monuments				
32	Martello Tower	Scheduled monument	The setting of the Martello Tower is unaffected by the proposed development, as the sense of	No impact

			openness and connection between the tower, coastal landscape and town is retained. View 17 of the Visual impact assessment considers a view of the Harbour from the Martello Tower.	
Non-designated Heritage Assets (located within the site)				
A	Harbour Master's House	Place of interest	The outline planning permission included the demolition of the Harbour Master's House; however, the proposal retains the Harbour Master's House as a key part of the development. Retention of the building is a key improvement over the outline scheme. The building is fronted by a square, and views from Marine Parade continue to have the building as a focal point to the east. Proposed development on either side of the Harbour Master's House (Plot H, Buildings 1 & 2 and Plot F, Buildings 1 & 2) are of a relatively smaller scale, creating a better transition between the heritage asset and the wider development. The massing has also been broken down to respond positively to the heritage asset, when compared with the Outline scheme.	Moderate Beneficial
B	Signal Box	Place of interest	The Signal Box is proposed to be restored and integrated within the scheme. It will form part of the landscaped area which fronts the Harbour (on the north side) and the visual links with the former railway platforms (also restored) are retained. When walking towards the site via the pedestrianised Viaduct/ Swing Bridge, the platform, Signal Box and Customs House can be appreciated as part of a group.	No impact
C	Former Railway Platforms and tracks	Place of interest	The former railway platforms have been restored since 2012, when they were in a very poor state of preservation. They presently form part of the main pedestrian link and thoroughfare between Folkestone and the Harbour Arm, via the Harbour plots, and have been suitably landscaped. The platforms and former railway tracks help divide the massing of the proposed development, while retaining the linear pedestrian progression through this site. Massing of buildings (Plot G1; buildings 1,2 and 3 and Plot F1; buildings 2 and 3) are set back from the platforms, and the form and design of the platforms is not compromised by these developments.	No impact

			Openings are created on the walls of the platform to link these with adjacent buildings, activating the frontages of the platform. The setting, form and fabric of significance are retained and preserved by the development, while bringing in new uses and integrating the building with the new development.	
D	Customs House	Place of interest	The truncated Customs House is retained as part of the scheme and will be restored and reused as part of the Harbour development. Plot G1, building 1 is set adjacent from the Customs House and does not overlap with its form. When seen from the Viaduct or the landscaped square to the north of the harbour plots, the Customs House will be seen as being distinct from new development. The physical and functional relationship between the Customs House and the railway platforms will be retained.	No impact

8.3 Impact on non-designated heritage assets

The proposed development retains the four non-designated heritage assets within the site (identified in the table above). As part of the Masterplan proposals and subsequent works on the site, these heritage assets have been restored and brought back into use; and currently form an integral part of visitor experience of the regenerated Harbour.

The Harbour Master's House was proposed to be demolished as part of the Outline Planning permission (as amended by the s.73 application); however, the retention, conservation and integration of this non-designated heritage asset into the scheme is a key heritage (public) benefit.

The proposals have been designed in relation to these assets, and the overall form, massing and scale of the proposed plots (agreed as part of the maximum parameters of the Outline Planning permission) respond to the retention and continued use of these assets. The detail design evolves this further with the introduction of open spaces fronting onto these heritage assets (Harbour Master's House and Signalling Box), as well as soft landscaping to help integrate these within the larger development.

As the historic function of these assets have been lost with the closure of the railway line, they have been adapted for new uses which would complement the proposed new uses introduced by the development.

8.4 Impact on the Folkestone Leas & Bayle Conservation Area

The Folkestone Leas & Bayle Conservation Area (FLBCA) is a large conservation area located north and west of the harbour. The subject site is not located within the conservation area; however, it is within the setting of the FLBCA. This assessment provides an impact of the proposed development on that setting.

The Harbour forms an important part of the setting of the conservation area and delineates its southern boundary; and the East Pier which helps form the Outer Harbour, is located within the conservation area. The focal nature of the harbour in relation to the conservation area is accentuated by the form and topography of the surrounding landscape. A number of views have been identified (Key Views and Vistas) in the 2008 Conservation Area Appraisal, which include the harbour site as part of the background; and an assessment from these views has been included within the Visual Impact Assessment.

The proposed development would be wholly within the maximum parameters imposed by the outline planning permission and include a reduction to the consented scale and massing. A number of plots, notably G-2 have been omitted from the proposed development, reducing on the density of development on this site and giving back in increased public realm.

The detailed design and materiality of the proposals further adds to the layered nature of the development, with sky gaps and the form and articulation of individual buildings breaking down the solid, 'wall-like' massing indicated in the outline planning permission. The massing steps down towards the west, meeting the height and scale of developments along Marine Parade, which are also part of the Masterplan development. The tallest massing is focussed to the east, where Buildings 6 and 9 (Plot G-1) have a lighthouse effect, and provide a bookend to the development, on the east side. Likewise, the buildings on the north side (Plot H- Buildings 1, 2 and Plot G1- Buildings 1, 4 & 7) have a wharf-like design, with a scale and roof form which pay homage to the traditional architecture of Folkestone. The proposed roofline is varied and visually interesting, offering a dynamic silhouette against the backdrop of the sky.

When seen from long distance views, the sense of openness of views is retained although modified by the proposals; and the distinction of the outer and inner harbours, the East Pier and Harbour Arm are appreciated.

The proposed development is expressed as a contemporary piece, and the next phase of development in the story of Folkestone, lending it a destination quality when seen from within the conservation area.

Based on the aforementioned information, including the **neutral contribution** of the existing site to the settings of heritage assets and the overall setting of the Folkestone Leas & Bayle Conservation Area, the scale of the impact on the CA is assessed as being **minor**; and the nature of the impact as being **neutral**. This assessment takes into account relevant views provided in section 10, specifically Views **1-2** and **6-16**, which consider the conservation area and assess the site's impact on its surroundings.

There are no other nearby conservation areas which would be impacted by the proposed development.

9 Townscape Assessment

9.1 TCA 1: Folkestone Harbour Area

The Proposed Development will have a demonstrably significant impact on the character, appearance, and function of TCA 1 owing to its encompassment of the Site. Whilst the overarching scale of the Proposed Development has been secured through the Outline consent, the detailed nature of the scheme is to be secured through this RMA and so it is these details which have contributed to the subsequent assessment of the notable change in character to the Site and the wider TCA.

The Proposed Development wholly alters the existing characteristics of the Site through the introduction of a new, mixed-use development with buildings of height and areas of landscaping and public realm that are designed to encourage pedestrian movement through the Site. The Proposed Development, as secured by the Outline consent, establishes a new urban grain within the Site, one characterised by a series of large buildings and which undulate in scale and are manifested in varying typologies, including terraced crescents and individual, statement buildings (e.g. the Rotunda and the Lookout). The scheme establishes a series of distinctive character areas within the Site which are reinforced through the application of these typologies, reflecting the mixed-use nature of the Proposed Development and the desire to respond to a varied urban townscape in the setting of the Site.

The Visual Impact Assessment at Section 10 has demonstrated that the Proposed Development will provide a highly conspicuous and prominent focal point within Folkestone, particularly where it is appreciated from the seafront and areas of higher ground. The destination quality of the Site is clearly evident in views from other TCAs and is manifested within TCA 1 through the nature and form of the architecture (in particular the statement/landmark buildings proposed), the provision of public uses including shops, restaurants and cafes, and the creation of the high-quality public realm and pedestrian routes which are intended to encourage movement towards and through the Site.

The arrangement of built forms within the Site, including the crescent/terrace of Plot F1 (mirroring the alignment of the former railway track), the terminus provided by the Rotunda (within Plot G1), and the pedestrian routes that sweep through the Site will have the effect of promoting this movement, and will improve the connection to the Harbour Arm and Lighthouse to the south. This will have the effect of creating a sense of permeability through the Site, notwithstanding the change to its coarseness, density and enclosure owing to the scale and massing of the new built forms.

In contrast to the existing condition of the Site, notably characterised by poor quality and undefined hardstanding and an incoherent vacuous non-entity the new public realm will encourage activity within the Site and will contribute to the overall aesthetic and architectural quality of the scheme. The retention and integration of the former Folkestone Station and railway line into the landscaping proposals, as well as the creation of the public square around the preserved Harbour Master's House, provides a clear and legible architectural reference to the historical function and identity of the Site, and also provides a wider contextual link back to the development of Folkestone in the Victorian period. The Visual Impact Assessment at Section 10 has demonstrated that the proposed landscaping scheme aids the integration of the new built forms into the context, even if to a minor degree, whilst within the Site, soft landscaping and high-quality hardstanding will be used to define pedestrian

routes, aid wayfinding, and create distinctions between different character areas within the development.

The placement of public uses at ground floor level will provide a sense of natural activation and vitality within the scheme and, where visible from other neighbouring TCAs, will signal the destination quality of the Site. The proposals provide an architectural distinction between residential and public-facing areas, utilising greater levels of glazing and double-height frontages to communicate the latter, creating active frontages and a sense of permeability to the streetscapes within the Site.

Whilst the scale of the Proposed Development has been accepted in principle through the Outline consent, the articulation of the massing and detailed design has been the focus of this RMA. The density and coarseness of the scheme is broken down through the detailed articulation of the buildings' envelopes, including highly expressive and faceted balconies and window openings. The varying roofscapes applied to the scale create visual interest when experienced across the Harbour, albeit the general impression of mass and density within the Site is still notable.

Generally speaking, the architectural language of the Proposed Development represents a general departure from the traditional characteristics which define much of Folkestone's townscape (i.e. reflected in the scale and massing of the scheme, as well the obvious contemporary expression of the proposed buildings). However, the Proposed Development does directly reference the geometrical and architectural motifs present in the Harbour, such as the shape of the Victorian trusses (refer to page 204-207 of the Design and Access Statement for further detail). It also employs subtle architectural nuances which have been informed by the wider townscape beyond TCA 1 (owing to the fact it is largely undeveloped itself), including the crescent/terraced forms utilised in Plot F1 and the colour and tonality of the materials used, including the light, white render which reflects the traditional seaside properties along Marine Parade and along the cliff to the west, as well as the corrugated red panelling, which mirrors the tonality of traditional red-brick residential buildings in the wider townscape, such as those along The Stade. The architectural language of the Proposed Development also ties the scheme into the existing and emerging context to the west (TCA 7), defined within the Masterplan area. The utilisation of similar architectural forms, materiality and focus on public realm will create a cohesive and consistent townscape along this stretch of Folkestone's seafront with a clear identity and destination quality.

With regard to the wider TCA, which encompasses the Harbour area to the north of the Site, including the Grade II listed viaduct and swing bridge, the impact of the Proposed Development on the character and appearance of this element of the townscape/landscape will be equally significant. The scheme provides a new sense of visual enclosure and definition to the southern edge of the Harbour, and subsequently changes its relationship with the wider townscape as well as the surrounding natural landscape. The visual impact on this part of the TCA is illustrated by Views 7 and 8, where the scheme is seen to be a conspicuous element than affects the openness of the area and the connection with the skyline beyond. Whilst this adverse effect is notable, the creation of a new destination quality within the Site and the encouragement of pedestrian movement and focus on the scheme is considered to go some way to balancing the visual impact.

Overall, for the reasons described above, the impact of the Proposed Development on TCA 1 is judged to be **Moderate Beneficial**.

9.2 TCA 2: The Stade and East Cliff

From the key areas which characterise TCA 2 – The Stade and the east cliff top – the Proposed Development will be fully appreciated. The open and expansive sea views from The Stade will be demonstrably changed by the introduction of new buildings of scale into the Site, serving to enclose the southern edge of the Harbour. Whilst the existing relationship which connects The Stade to the Harbour will be physically unchanged, and the legibility of their historical functional relationship to one another maintained, the Proposed Development will create a new focal feature as experienced from this streetscape that has the potential to materially change the character and function of this part of the TCA. The Proposed Development will be understood as forming the continuation of the sea-front development which extends to the west away from TCA 2. Whilst it is acknowledged that the overall scale of the Proposed Development is accepted in principle owing to the consented Outline scheme, the grain and form of the development clearly communicates the fact it is a new destination with a distinct and landmark character. This visual impact is illustrated by Views 6 and 18 at Section 10. There are subtle architectural references such as the use of a red tonality and pitched roofs within the scheme which provide a contextual link to the built forms which line The Stage, although the design language is clearly contemporary.

From less open parts of the TCA, such as East Street and the wooded area to the north, the Proposed Development will likely be entirely obscured, partially screened by vegetation, or peripheral to the experience of the immediate townscape/landscape. This is again a contrast to the experience of the Proposed Development from the open clifftop, where the scheme will be highly visible and create a new peninsula of development that projects out into the Harbour. As with the experience from the lower ground, the scheme creates a new focal point, emphasised particularly by the southern-most, rotunda style building (Plot G1), and identifies the Site as a clear and prominent destination in the local townscape.

Owing to the change to the visual relationship of and experience between TCA 2 and the sea-front/Harbour, the impact of the Proposed Development on TCA 2 is judged to be **Minor Adverse**.

9.3 TCA 3: Cliff-Top Residential

In a similar sense to TCA 6, much of this TCA is focused inwards, with residential properties arranged on linear axes which appear to channel views north towards the hilly landscape beyond Folkestone's suburban hinterland. There are glimpsed views from the interior of the TCA towards the sea, achieved owing to the area's elevated topography and gaps through the built form. Wear Bay Road forms the TCAs southern boundary and has a sense of openness that is afforded by its cliff-top alignment; residences along this route look out towards the sea.

From much of TCA 3, the Proposed Development will be wholly obscured and have no impact on the appearance or character of the residential townscape. Where the Proposed Development is visible, it will be understood as part of the emerging sea-front context, which is already characterised by new-build developments, and as an extension of the residential and commercial context of Folkestone. The Proposed Development will be more visible and prominent from some parts of the TCA than others, such as from Wear Bay Road and in linear views along axes such as Harbour Way. From these locations, the Proposed Development will likely obscure all or part of the sea view, and therefore has the potential to change the relationship between this TCA and the Harbour, particularly for those

residences which look out towards the sea. The detailed articulation of the Proposed Development seeks to break down the visual massing of the scheme in views from TCA 3, albeit the scale and overall density of the development will be notable; the architecture will communicate the mixed residential and commercial character of the Site and will potentially encourage pedestrian movement from TCA 3 towards the scheme.

Notwithstanding this, and the likely visibility of the Proposed Development from parts of the TCA, it is considered that as a whole, the character, appearance and function of TCA 3 which remain largely unchanged and affected by the scheme to only a minor degree. Consequently, the scale of the proposals' impact is assessed as being **minor**; and the nature of the impact as being **neutral**.

9.4 TCA 4: Utilitarian Corridor

In contrast to other neighbouring TCAs, TCA 4 is relatively open, with a looser townscape grain and greater degree of visual connection to the seafront, albeit the viaduct along Tram Road does create a sense of visual enclosure until the road diverts west and the views south open up. Notwithstanding this, the streetscape is punctuated by street furniture and planting, which provide a degree of visual screening towards the seafront, meaning that views towards the Harbour and, ultimately, the Site, are incidental in nature, as opposed to focused. As such, whilst the Proposed Development will be a visible feature of the wider setting of TCA 4 and understood as forming a new high-quality development on the sea front, it is not considered to provide a new focus that will distract from the attention on the immediate surroundings.

Notwithstanding this, and as in other commercialised parts of the town, the Proposed Development will identify the extension of the commercial centre of Folkestone of the Harbour and has the potential to encourage movement south from TCA 4 towards the Site. The Proposed Development will signify the regeneration of the Site, providing a new destination that will be appreciable from TCA 4.

Overall, and regardless of the aforementioned visual connection, it is considered that the Proposed Development will not materially affect either the appearance or function of TCA 4, which in itself is relatively low quality and disparate. Consequently, the scale of the scheme's impact on this TCA is assessed as being **minor** in scale; and the nature of the impact as being **neutral**.

9.5 TCA 5: Tontine Street

Owing to separating distance, interposing buildings, street orientation, and the generally tight-knit and inward-facing character of built form in TCA 5, it is judged that the Proposed Development will not materially change the appearance or function of the townscape in this area to the north of the Site. Whilst the Visual Impact Assessment (**Section 10** and **View 11** in particular) has demonstrated that the Proposed Development may be visible in linear views along Tontine Street, the scheme will be wholly peripheral to an experience of the local townscape within this mixed, commercial area. Where the Proposed Development is experienced in glimpsed and incidental views out of TCA 5, it will be appreciated as an extension of the commercial centre of Folkestone, albeit contrasting in architectural character, grain and scale to the local townscape, and create the impression of a new destination. On the whole however, and as defined above, it is considered that TCA 5 will be largely unaffected by the Proposed Development.

For these reasons, the scale of the proposals' impact on this TCA is assessed as being **minor** in scale; and the nature of the impact as being **neutral**.

9.6 TCA 6: Old Town Centre

TCA 6 encompasses a sensitive and historic part of Folkestone town centre, characterised at the same time by the intimacy, enclosure and tight knit-grain of its historic streetscapes and its position atop the Leas cliff. It is interesting and important to note that views out from this historic core, and particularly to the south, are largely limited - despite the TCA's elevated position and its proximity to the seafront - to glimpses between buildings or, in a more targeted sense, at the terminus of streets including The Bayle, The Parade and the Old High Street. As with the townscape around Tontine Street, the general experience of the built form and broader character of the TCA is relatively inward focused.

Views 11, 12 and 13 (see Visual Impact Assessment, **Section 10**) illustrate how the Proposed Development will appear in views from the aforementioned locations out of TCA 6 towards the Site. In these instances, the Proposed Development is experienced as a background element, albeit its scale and massing is notable and conspicuous, changing the character and nature of the existing intervisibility with the sea, the Harbour, and the horizon. The detailed design of the Proposed Development as reflected in the views has sought to break down the visual massing and density of the scheme, utilising a variety of architectural devices including a highly articulated roof profile, contrasting material palettes, faceted façade treatments and creation of areas of light and shadow.

Whilst the potential for these visual changes from these locations in TCA 6 is notable, from most areas of the TCA, the Proposed Development will either be wholly obscured or glimpsed through building gaps, and in both cases entirely peripheral to an experience and enjoyment of the high-quality townscape that embodies Folkestone's historic core.

For these reasons, the scale of the proposals' impact on this TCA is assessed as being **minor** in scale; and the nature of the impact as being **neutral**.

9.7 TCA 7: Seafront Developments

The Proposed Development will be experienced from TCA 7 as a continued expansion of the developments along the Seafront. The scheme provides a new terminus in views from the west, as demonstrated by Views 1 and 2 in Section 10 and has the effect of continuing the natural desire line along Marine Parade, encouraging pedestrian movement through TCA 7 towards the Site.

Whilst the Proposed Development is of a greater scale and density (owing to the breadth and shape of the Site) than the existing developments on Marine Parade, the scheme is tied to the new and historic developments which characterise this streetscape via shared architectural characteristics including: curved, crescent and terraced buildings forms, materiality, including a light render which softens the visual massing of the largest buildings within the Site, pocketed areas of green space and public realm, and maximisation and architectural emphasis on sea views to the south. Notwithstanding the coarser grain and larger scale of the Proposed Development (with the exception of the Grand Burstyn Hotel, with which the Site will share a similar massing), the scheme is considered to tie in successfully with the existing and emerging character of TCA 7, which in itself is in a state of flux. The consented developments along the sea front and which form part of the wider masterplan

have already secured the change in openness and visual interrelationship that this area will have with the seafront to the south.

In terms of the experience of TCA 7, it is clear that the Proposed Development will reflect the continued regeneration of the seafront; the new buildings will signal the creation of a new destination that physically and visually connects to the existing townscape along Marine Parade.

Overall, it is judged that the Proposed Development will have a **Minor-Moderate Beneficial** effect on the character, appearance, and function of TCA 7.

9.8 TCA 8: The Beach

In a similar respect to TCA 2, the Proposed Development will have a notable impact on the character, appearance and function of the beach and seafront landscape that extends to the east and west of the Site owing to its scale and visual change to the current open and expansive seafront. The existing openness stems from the removal of a lorry park and amusement park, which historically constituted an iconic part of the seafront landscape of Folkestone. The character and function of this part of the study area has subsequently evolved in recent years, and a new relationship with the Site has been established.

As a result, the infilling of the Site area with built form of considerable scale and massing will demonstrably change the character of TCA 8 by effectively separating the seafront into two distinct areas, i.e. to the east and west of the Site. The visual permeability that currently exists between the sandy foreshore, the Harbour, and the clifftop beyond will be altered in views from the west towards the Site, as illustrated by **View 3** at **Section 10**. It should be noted however, that the change to this existing and historic relationship was accepted in principle through the consent granted to the Outline scheme.

The detail that is secured through this RMA demonstrates how the massing within the Site will be broken down, and how new links through the Site and the creation of new public uses and public realm will provide facilities within reach of the beach which defines Folkestone's seafront, providing a new destination and focal point in the immediate setting of TCA 8. Whilst the benefits of the scheme in this respect are acknowledged and accepted, it remains that the detailed design of the Proposed Development provides a significant contrast and change to the existing character, appearance, function, and experience of the beach, transforming it from a natural landscape with historic man-made interventions to one that is developed at a different scale. For these reasons, the impact on TCA 8 is judged to be **Minor Adverse** within the parameters that have been accepted through the Outline scheme.

10 Visual Impact Assessment for the Reserved Matters Application

10.1 Introduction

It should be noted a full visual impact assessment for the Masterplan was firstly carried out in 2012, subsequently updated in 2017 according to the changes in the design of the proposal. The original full VIA includes a total number of 24 views, and some of them have been superseded in 2017.

The Visual Impact Assessment in this heritage statement encompasses a total of 19 views. This includes 14 viewpoints inherited from the Masterplan and an additional 5 viewpoints incorporated to offer more comprehensive insights into the proposed works. The location of the 19 viewpoints is labelled on the map extract provided in Figure 65 below.

All the views have been provided by the visualiser to depict the proposals and their impact extending beyond the subject Site. These views will encompass photographs illustrating existing views, the Masterplan's outline, the proposed developments, and cumulative perspectives incorporating the developments of other plots within the Masterplan.

10.2 Methodology for Assessing the Impact

The full methodology of this Townscape Visual Impact Assessment has been provided in Appendix II & III. To facilitate the discussion, the location of the views has been agreed by Historic England (Reference: PA01198780) and the case officer. These views have been selected based on the identified heritage assets (including the conservation area) and townscape character areas, which has the potential to be impacted by the proposed development.

It is crucial to note that this application pertains to reserved matters, subject to the conditions established by the approved s.73 application in 2018 (planning reference: Y17/1099/SH). The impact assessment therefore considers the Outline Planning permission amended by the aforementioned s.73 application as the planning Baseline.

Article 6 of The Town and Country Planning (Development Management Procedure) (England) Order 2015 delineates the criteria for evaluating the approval of a reserved matters application. The assessment within this report has considered the following aspects:

- **Appearance** - aspects of a building or place which affect the way it looks, including the exterior of the development.
- **Means of access** - covers accessibility for all routes to and within the site, as well as the way they link up to other roads and pathways outside the site.
- **Landscaping** - the improvement or protection of the amenities of the site and the area and the surrounding area, this could include planting trees or hedges as a screen.
- **Layout** - includes buildings, routes and open spaces within the development and the way they are laid out in relations to buildings and spaces outside the development.
- **Scale** - includes information on the size of the development, including each proposed building.

In adherence to the framework established by The Town and Country Planning Act, the details of the reserved matters application must align precisely with the outline approval, including any conditions stipulated within the permission. It is considered that the application which is the subject of this report

does comply with the outline application and the detailed proposals sit within the maximum parameters established by the outline scheme.

When evaluating the visual impact of the proposed developments, the assessor will follow the methodology provided in Appendix III as well as the guidelines outlined in The Town and Country Planning Act. This involves comparing the visual impact of the proposals against the consented outline delineated by the s.73 application granted in 2018 (Y17/1099/SH). To provide a comprehensive understanding of the Masterplan's context and background information, each assessment will feature a set of four verified views, encompassing:

- **Existing** – View showing the current appearance of the view
- **Baseline** – View showing the consented outline of the Proposed Development
- **Proposed** – Views showing the exact outline and detail of the Proposed Development at AVR Levels 1, 2 or 3
- **Cumulative** – Views showing the exact outline and detail of the Proposed Development with the rest of the consented outline.

The outcome of the assessment hinges on the comparison between Baseline views and Proposed views. This approach ensures that the evaluation accounts for the intended changes and developments illustrated in the proposed plans, juxtaposed against the current state represented by the baseline views. By focusing on Proposed views, which encapsulate the envisaged outcomes of the proposed developments, and comparing them with baseline views, which depict the current planning baseline, this assessment provides a comprehensive understanding of the potential impact and implications of the design being submitted for the reserved matters application.

The criteria used to assess visual impacts on individual views are described in Appendix III. However in summary, the impacts have been subdivided into:

a) Nature of impact and

b) Scale of impact.

The Nature/ Magnitude of Impact could be either:

- Beneficial
- Neutral
- Adverse

Likewise, the scale of impact (in relation to “Beneficial” or “Adverse” ratings) could be:

- Non-effect- The proposals will not result in any change to townscape character, elements, settings of heritage assets, etc in this view.
- Negligible- The proposals will result in a just discernible change to townscape character, elements, settings of heritage assets, etc in this view.
- Minor- The proposals will result in a small change in the key characteristics of townscape character, elements, settings of heritage assets, etc in this view.
- Moderate- The proposals will result in a partial change in the key characteristics of townscape character, elements, settings of heritage assets, etc in this view.
- Major- The proposals will result in a total change in the key characteristics of townscape character, elements, settings of heritage assets, etc in this view.

View 1 View east from Marine Parade

Existing



This view is situated at the junction of Marine Parade and Marine Terrace, facing east towards the Harbour area along Marine Parade. This location is approximately 80 metres to the western boundary of the subject Site.

Positioned in close proximity to multiple car parks on the western side of Marine Parade, this view will be predominantly experienced by road users, residents, and visitors as they make their way towards the Harbour area.

The key feature in the view is the western elevation of the Grand Burstin Hotel and its associated car park, dominating a significant portion of the left side of the visual field. On the right side of the view, the area extends as a continuation of the beach, featuring temporary cargo container structures. At the centre of the view, the alignment of the road directs attention towards the Harbour Master’s House, which is identified as a ‘Place of Interest’. The built form within the view contributes to a mixed utilitarian and commercial character. Despite the structures within the view, there is a sense of openness towards the right side of the visual field, providing the pedestrians with a chance to appreciate the sea view.

Similarity with previous views assessments: The viewpoint location is similar to viewpoint 8 submitted for the s.73 application (Y17/1099/SH). However, the view direction here has been adjusted to face in the opposite direction to illustrate the massing of the proposals associated with this application.

Visual Receptors sensitivity	Value of Heritage Assets	Townscape Character Area	Amenity value
Medium	Low (Harbour Master’s House)	View is taken from TCA 7	Low- Medium

View 1 View east from Marine Parade**Baseline (with consented outline)**

The maximum parameters of the outline planning permission included a building volume enveloping the Harbour Master's House on three sides. This built mass stepped down towards The Grand Burstin and has a cascading form towards the beach.

Proposed

In this view, the proposed development is seen as the terminus of Marine Parade, looking east. The scheme would create a sense of destination as the viewer progresses along Marine Crescent.

The Harbour Master's House will continue to be seen in the foreground and is not concealed by other development, it continues to form the focal point along the axis of this view, with the proposed development. Backdropping the locally listed building, which will become increasingly prominent as the viewer progresses east.

The material distinction and articulation of the proposed development will break down the building mass further, softening the appearance of the new forms and creating relief within the view. The presence of sky gaps to the left of the Harbour Master's House allows for a view beyond, suggesting the continuation of the route beyond the site, while also aiding the breaking down of the development massing.

The proposals have a highly articulated roof form in this view, creating visual interest and distinguishing the individual building forms within the site. Building heights taper toward the beach, maintaining an understanding of the natural topography of the landscape.

Overall, the scale of the impact is assessed as being **minor**; and the nature of the impact as being **neutral**.

View 1 View east from Marine Parade

Proposed (Cumulative)



According to the consented outline, much of the massing of proposals on the Harbour plots will be screened following the constructions of the other Plots. The development of these plots would further the linear focus of Marine Parade.

Architecturally, proposals for Plot F1 will have a consistent design with Plot E and be of a similar scale.

Overall, the scale of the impact in this cumulative view is assessed as being **minor**; and the nature of the impact as being **neutral**.

View 2 View east from Marine Crescent

Existing



This view is situated in front of Marine Crescent, approximately 400 meters away from the western boundary of the subject site. Similar to the previous viewpoint (View 1), this view will be experienced by road users, residents, and visitors as they make their way towards the Harbour area. There is currently a lower volume of residents and visitors using Marine Parade, however the visual receptor sensitivity is expected to increase with the construction of Plots A-E along this road.

To the left of the view, the Grade-II listed Marine Crescent holds a dominant position and is an important focus of the receptor as they move along Marine Parade. The Crescent is accompanied by a garden featuring tropical bushes, contributing a verdant character to this view which reinforces the residential character of the terrace. Directly beyond the Crescent, the Grade-II listed terrace (Nos.10-15 Marine Parade) is just visible, revealing its plain and secondary side (west) elevation. Beyond the terraces, the Grand Burstin Hotel with its strong modernist design becomes partially visible from this viewpoint; it becomes more apparent and prominent in the visual experience of the receptor as they proceed along Marine Parade.

On the right side of the view, the expansive beach provides a notable sense of openness. In the distant background, the Harbour Arm and the Grade-II listed Lighthouse may be partially visible. This view not only allows for the appreciation of the architectural detail of the listed building but also showcases its distinctive setting closely associated with the seafront. Therefore, the amenity value of the view is considered to be **medium**.

Similarity with previous views assessments: The viewpoint location is similar to viewpoint A1 submitted for the s.73 application (Y17/1099/SH).

Visual Receptors sensitivity	Value of Heritage Assets	Townscape Character Area	Amenity value
Medium	Medium (Marine Crescent; Marine Terrace; Harbour Master’s House; Folkestone Leas & Bayle CA)	View is taken from TCA 7	Medium

View 2 View east from Marine Crescent

Baseline (with consented outline)



The maximum parameters of the outline planning permission include buildings oriented along the depth of this view to the left and building mass which fans towards the coast following the historic form of the Harbour. This built mass has a cascading form towards the beach.

Proposed



In this view, the proposed development will be seen at the end of Marine Parade, in the centre-background. The development in this view does not change the overall experience of Marine Crescent and Marine Terraces, and these continue to feature prominently in the foreground on the left, maintaining their focal point status within the view.

The proposed development has a massing which steps down towards the sea, and the building articulation and materiality will further break down the visual of the scheme’s massing, as it is seen from this location.

The proposals have a highly articulated roof line, which would provide a visual interest to the terminus of this view.

Overall, the scale of the impact is assessed as being **minor**; and the nature of the impact as being **neutral**.

View 2 Looking east from Marine Parade

Proposed (Cumulative)

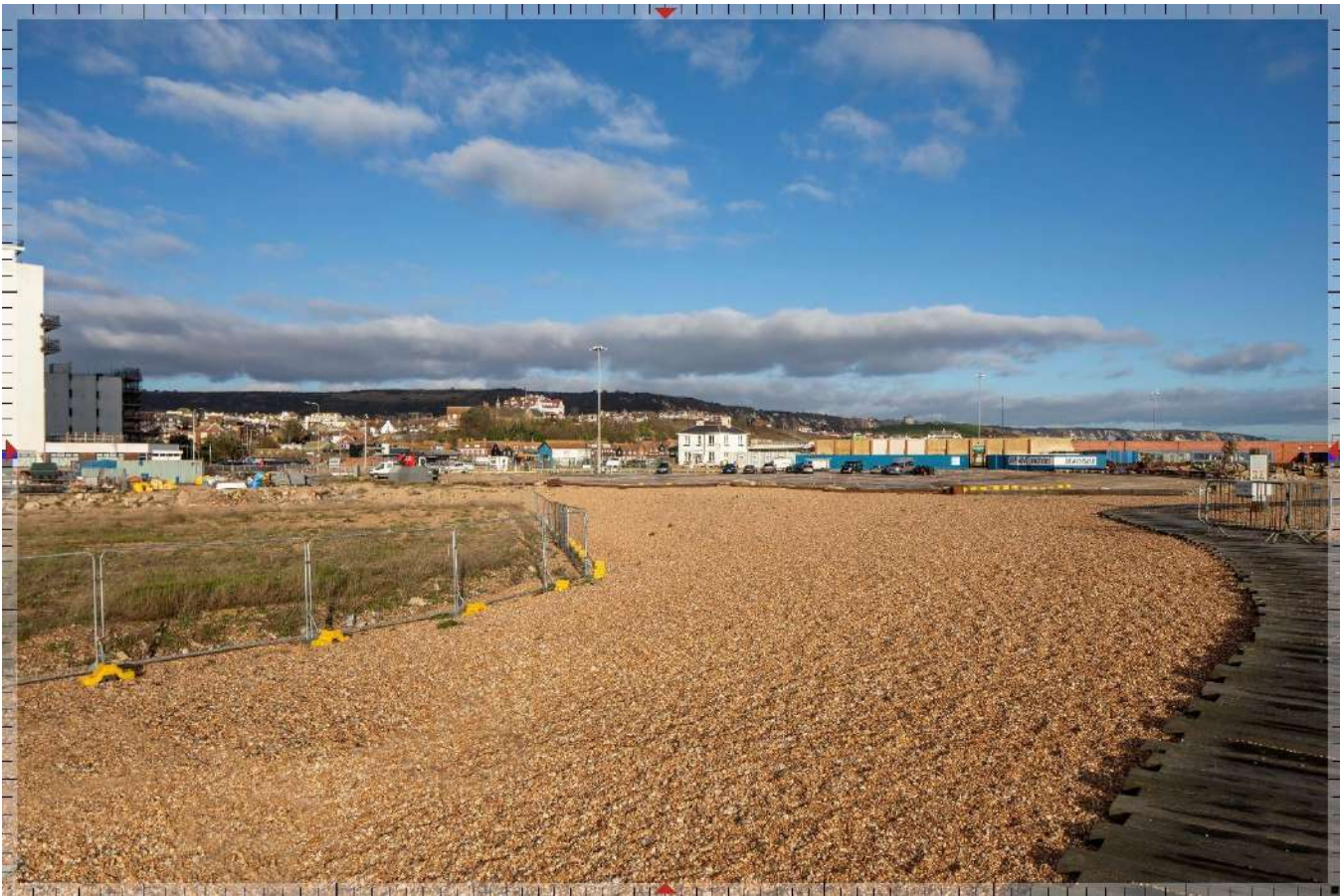


Much of the development is screened by the consented developments of Plots B, C, D and E, which form part of the foreground. Aspects of the proposals (part of Plot G1) which will be seen provide a visual punctuation to this view, adding to the visual interest, and contrasting from the architectural materiality and form of the plots in the foreground.

Overall, the scale of the impact in this cumulative view is assessed as being **minor**; and the nature of the impact as being **neutral**.

View 3 View northeast from the beach walk

Existing



This view is situated immediately outside the southwest corner of the subject site, approximately 40 meters away from the site's boundary and close to Plot E of the masterplan development. Positioned on the Beach Boardwalk, it will be experienced by local and visiting pedestrians.

This viewpoint is chosen for its relevance to the proposals and as a distant vantage point of the townscape within the Folkestone Leas & Bayle Conservation Area. It offers a panoramic perspective that captures the beach, the clifftop and the layer of townscape that separates the two natural landscapes.

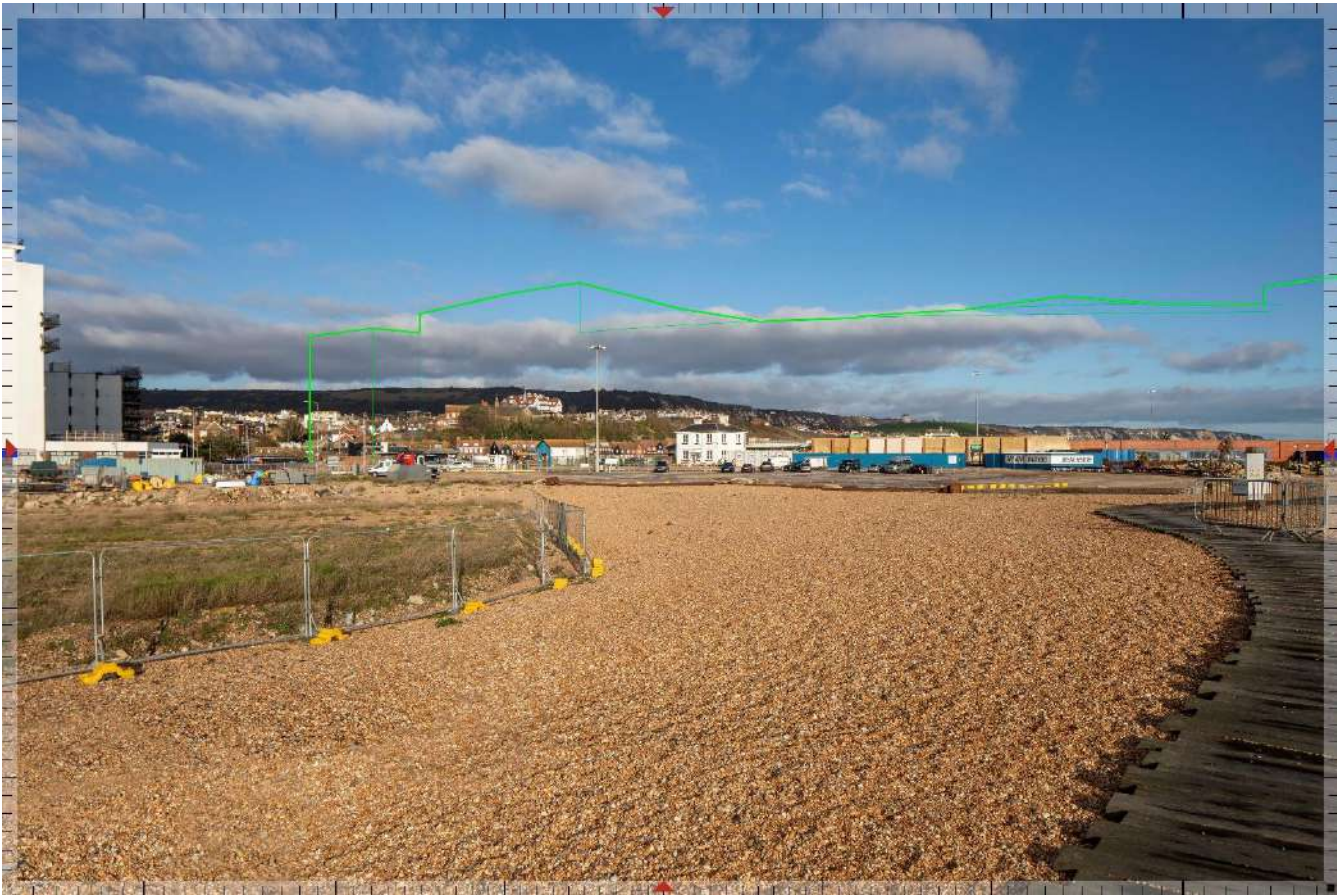
In the foreground, an extensive stretch of sandy beach dominates the scene, accompanied by modern hardstanding works to the left (the fenced area in the view). The remnants of the historic harbour station facilities are discernible, including the former Harbour Master’s House. Further in the distance are the buildings situated to the north of the Harbour and atop the west cliff. These structures contribute to the recognisable seaside landscape of Folkestone which is appreciated in this view.

Similarity with previous views assessments: None

Visual Receptors sensitivity	Value of Heritage Assets	Townscape Character Area	Amenity value
Medium	Medium (Harbour Master’s House; Folkestone Leas & Bayle CA)	View is taken from TCA 8	Medium

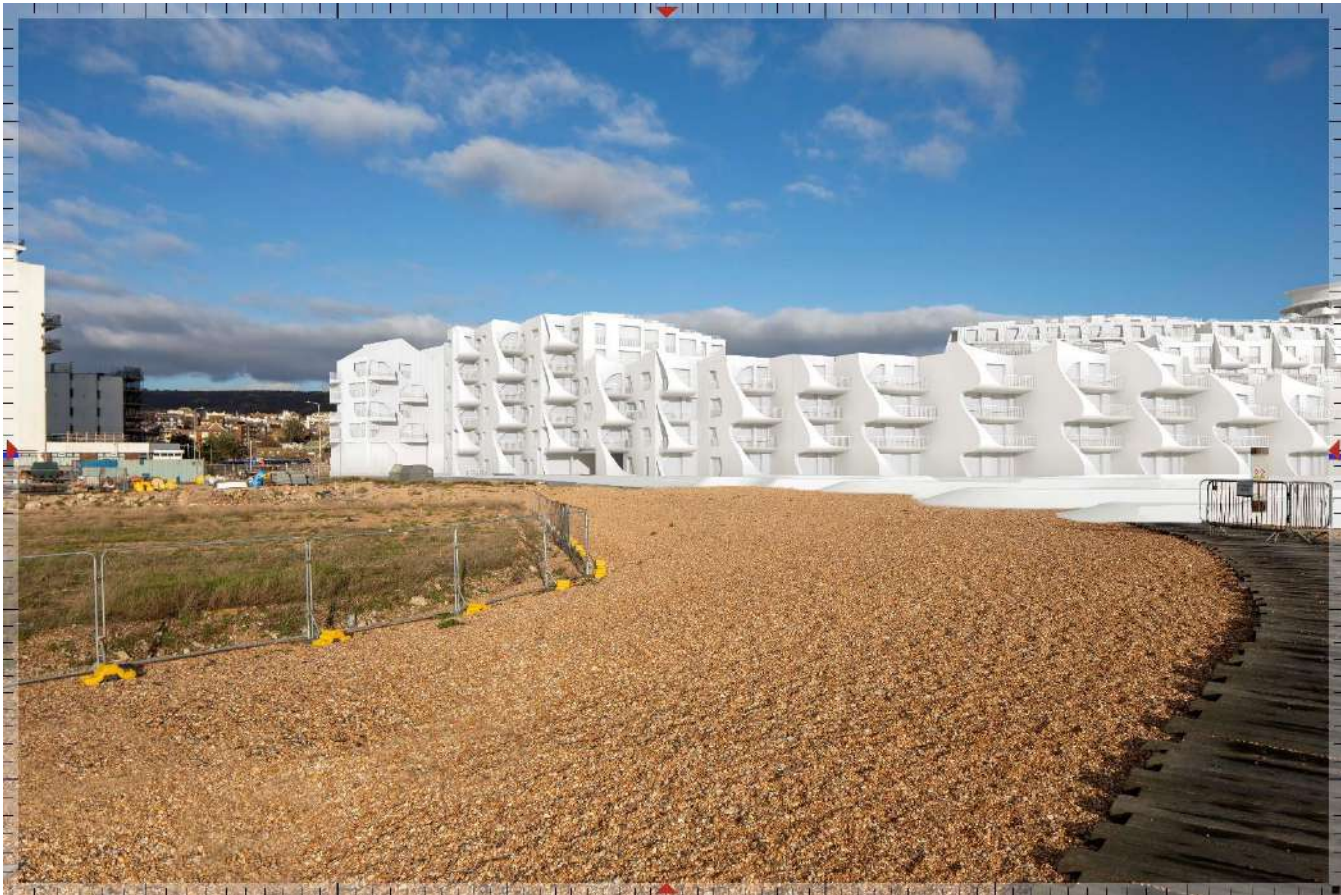
View 3 View northeast from the beach walk

Baseline (with consented outline)



The design consented as part of the outline masterplan includes an almost solid and continuous wall of massing, with little relief or variation in heights.

Proposed



This view from the southwest of the development shows the Site, particularly plot F1, at its broadest extent. The proposed development is seen as a continuous frontage stretching from the centre left to the right of the view and concealing the undulating landscape and associated townscape beyond.

The scale of plot F1 is lower than that secured through the outline consent, enabling a view across to the buildings beyond, giving a sense of the depth of the Site. Notwithstanding this, the scheme creates a sense of visual enclosure within the view, with a continuous building line to the Site’s eastern elevation. This effect is somewhat lessened by the relief that is provided through the expression and articulation of plot F1, which creates a sense of depth and visual interest.

The Harbour Master’s House, which is prominently seen in the centre middle ground is concealed by development within this view.

The development in this view also changes the way in which the beach and harbour are experienced, obscuring the visual links between the beach, Folkestone town, and the cliffs beyond.

Nevertheless, none of the building heights or footprints exceed the maximum parameters determined by the outline planning permission. For this reason, the scale of the impact is assessed as being **minor**; and the nature of the impact as being **adverse**.

View 3 View northeast from the beach walk

Proposed (cumulative)

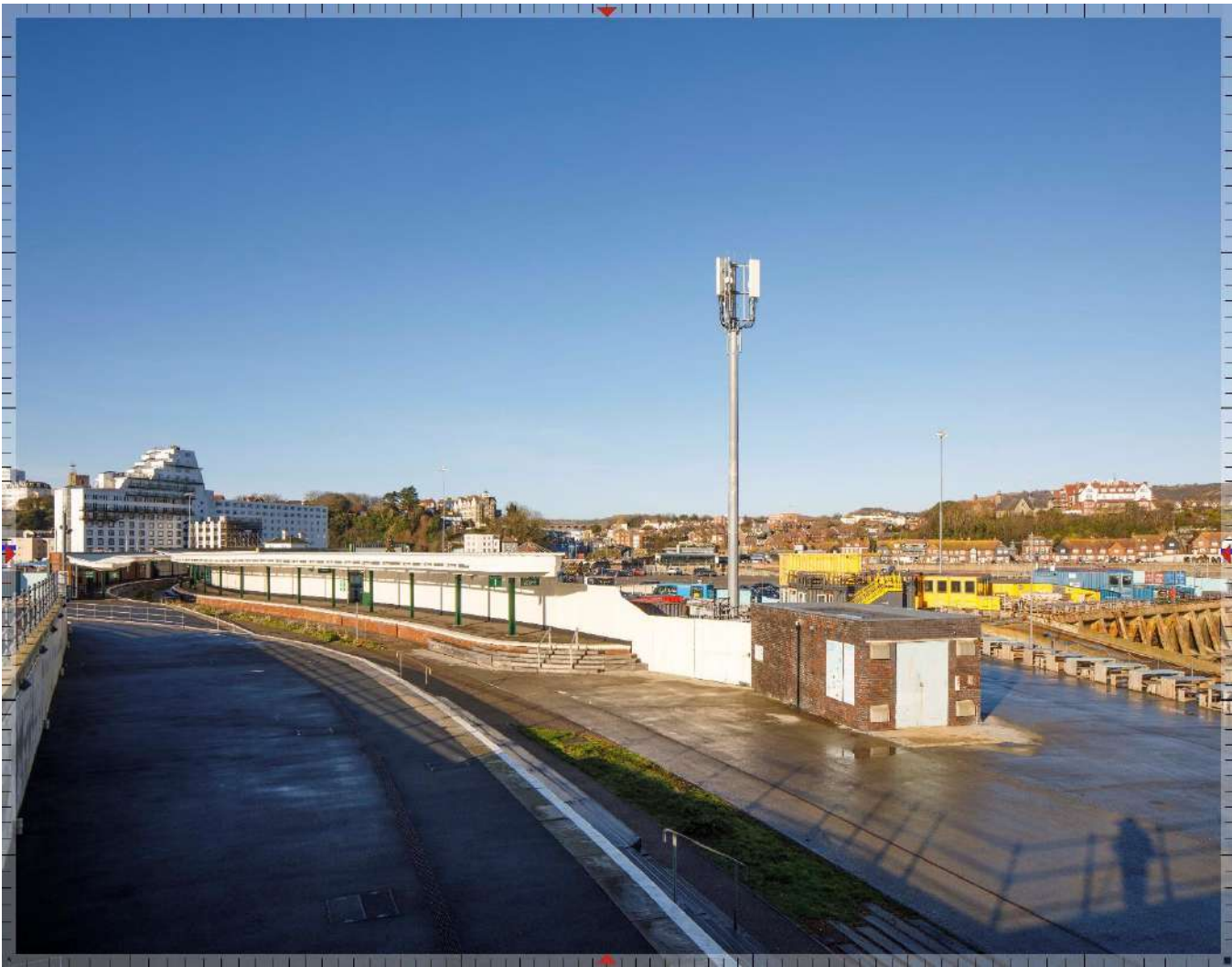


A significant part of the proposed scheme would be concealed behind other development consented as part of the Masterplan. Architecturally, proposals for Plot F1, seen through the gap will have a consistent design with Plot E to the left and Plot E2 to the right.

Overall, the scale of the impact in this cumulative view is assessed as being **minor**; and the nature of the impact as being **neutral**.

View 4 View north from the harbour arm

Existing



Experienced from the northern end of the Harbour Arm Pier, the most visually dominant element in this view is the historic Harbour Station’s platform (to the left, centre-ground) now restored and converted into an open gallery. The flat expanse of The Harbour is seen in the middle ground with the townscape of Folkestone in the background. The Grand Burstin Hotel is prominently seen to the left, screening the cliff forming part of The Bayle.

This view is located to the immediate south of the Site and will be experienced by pedestrian locals and visitors to the Harbour Arm and Lighthouse, and the view has a medium-high receptor sensitivity due to the site being a key visitor attraction in Folkestone, supported by the restoration of the station platform.

This view provides a panoramic experience of part of the Folkestone Leas & Bayle Conservation Area in the background. The built landscape lacks consistency as it is characterised by a mixture of developments, ranging from historic buildings of the late 19th C to several modern developments. These buildings share limited architectural coherence, forming a varied and somewhat fragmented appearance when viewed together from the Harbour.

Similarity with previous views assessments: The viewpoint location is similar to viewpoint 12 submitted for the s.73 application (Y17/1099/SH) but has been moved closer to the historic platform to capture the proposals which are the subject of this RMA.

Visual Receptors sensitivity	Value of Heritage Assets	Townscape Character Area	Amenity value
Medium	Medium (Harbour Master’s House; Folkestone Leas & Bayle CA)	View is taken from TCA 1	Medium

View 4 View north from the harbour arm**Baseline (with consented outline)**

The maximum parameters agreed by the outline planning permission was for the building mass to follow the curvature of the railway platforms and tracks, with the tallest corner element in the centre foreground. The intention is for this corner element to form the focal point of the development, and act as a lighthouse or punctuation to the development, when seen from the Harbour Arm and from the Channel.

Proposed

The proposed development is prominently seen in the foreground of this view and the massing is broken down to create a nuanced and layered design.

Sky gaps allow views through to buildings in the middle ground, expressing the depth of the site and encouraging pedestrian movement towards the scheme. This view demonstrates the scheme's variation in roof line and form, with the tallest buildings seen in the foreground (Building 6) and right (Building 9). Highly detailed and faceted buildings with a variety of forms adds visual interest to this view.

The ground floor and street frontages are well activated, and this creates an interesting relationship between the public realm and buildings and suggests an activated and enlivened atmosphere which draws the viewer's attention to the site. The integration of the built form into the view is aided through the softening effect of the landscape design.

The proposals also involve activation of the former railway tracks (locally listed), and integration of the existing, restored platforms with the landscaping; these are discernible in the view and contribute to the destination quality

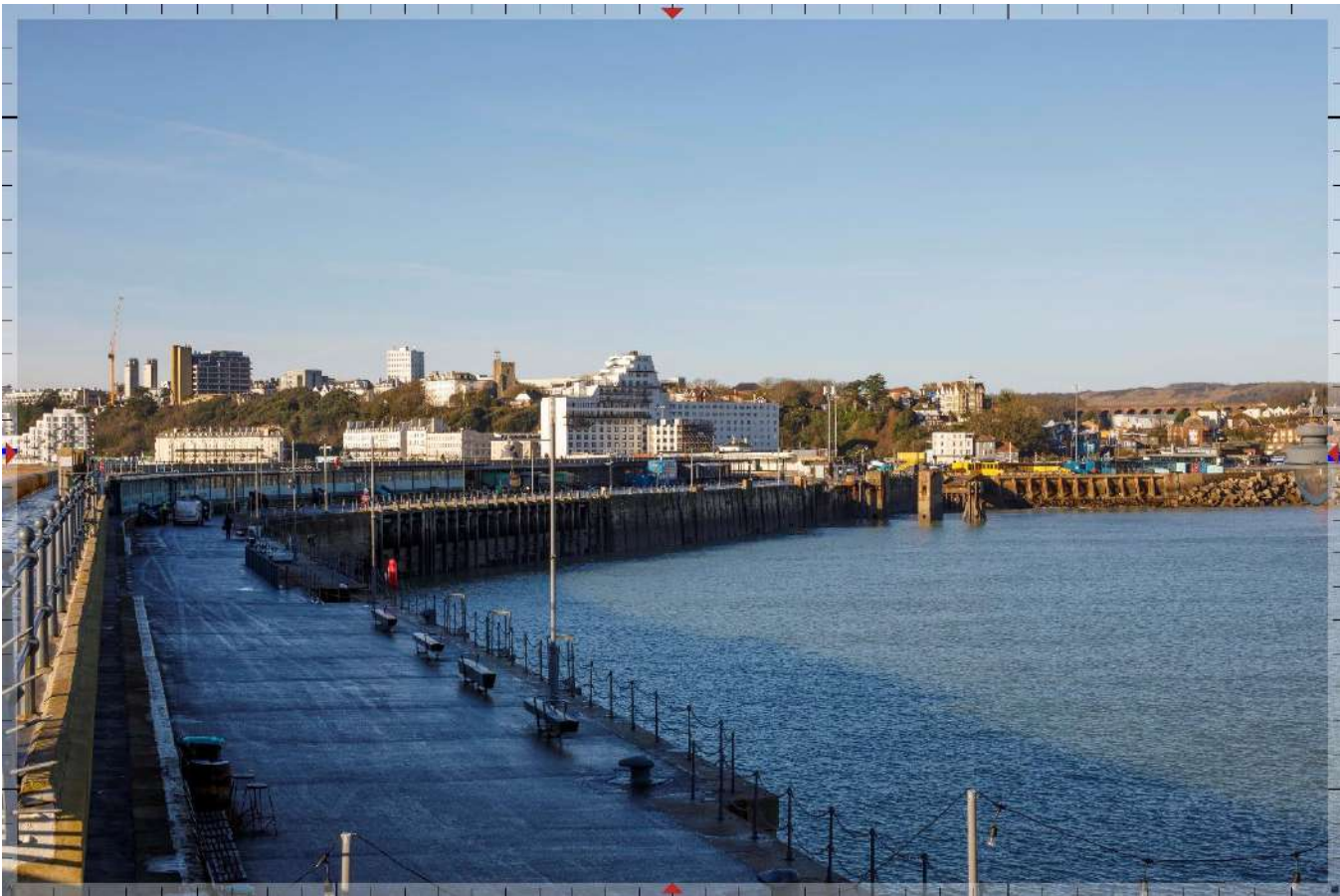
that is expressed. The massing of buildings facing onto the platforms is conceived to follow the form and curvature of the railway line.

Due to the density of massing, the townscape beyond is almost completely obscured, limiting the appreciation of topography and the Folkestone townscape when viewed from the Harbour Arm.

Overall, the scale of the impact is assessed as being **moderate**; and the nature of the impact as being **neutral**.

View 5 View North from Harbour Arm

Existing



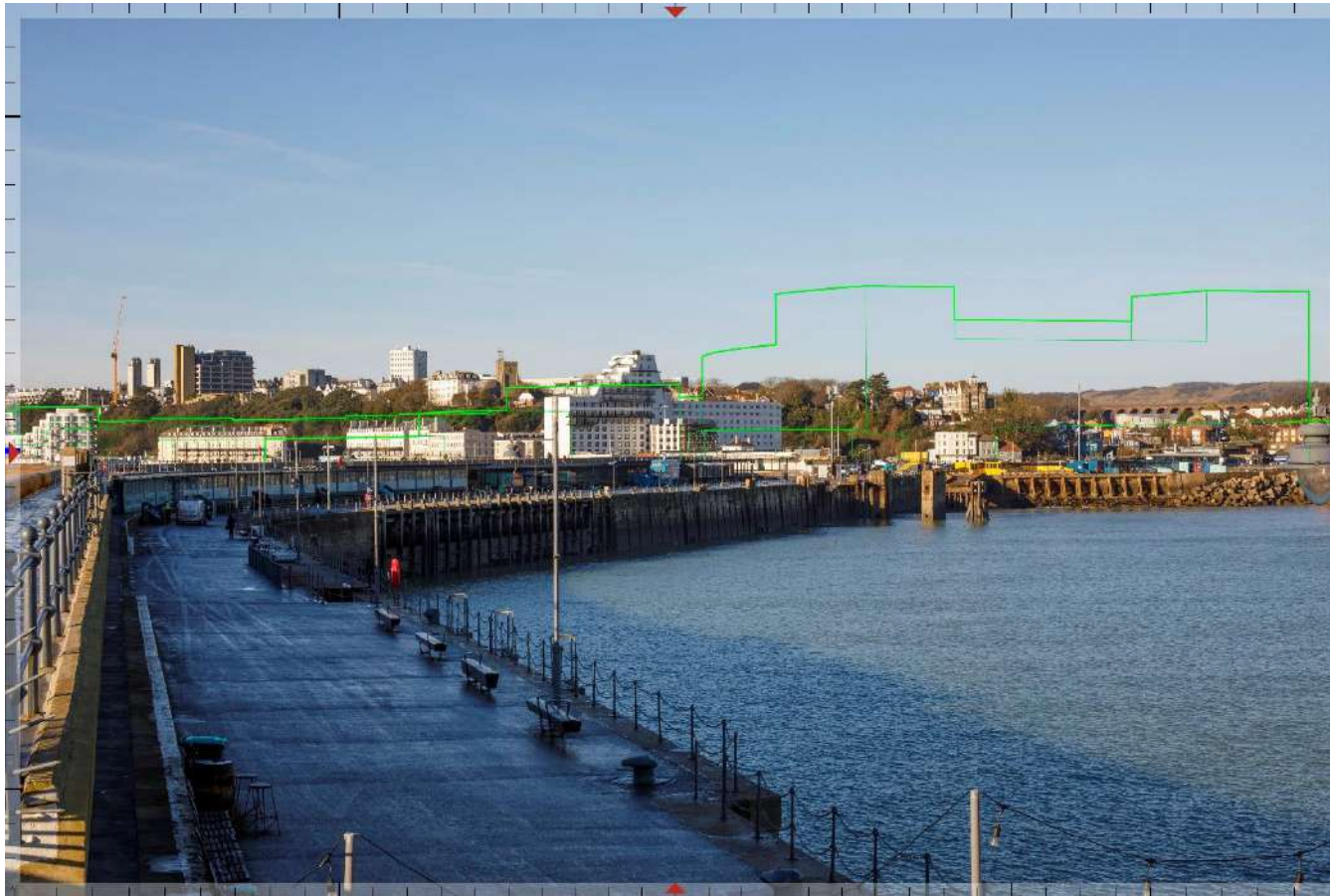
Visual Receptors sensitivity	Value of Heritage Assets	Townscape Character Area	Amenity value
Medium -High	Low (Folkestone Leas & Bayle CA)	View is taken from TCA 1	Medium- High

This view is situated on the Harbour Arm, approximate 120 meters away from the southern boundary of the Site, which dominates the foreground of the perspective. The view effectively illustrates the connection between the subject Site and the Channel, providing a sense of openness and reinforcing the visual legibility of the historical function of the Harbour and its relationship with the water. On the left side of the view is the Leas Cliff in the background, with numerous designated historic assets visible at the lower side of the cliff, including the Grade-II listed Crescent and terraces along Marine Parade. The Grade-II* listed parish church, along with several modern developments, is situated atop the cliff, experienced in the background of the view.

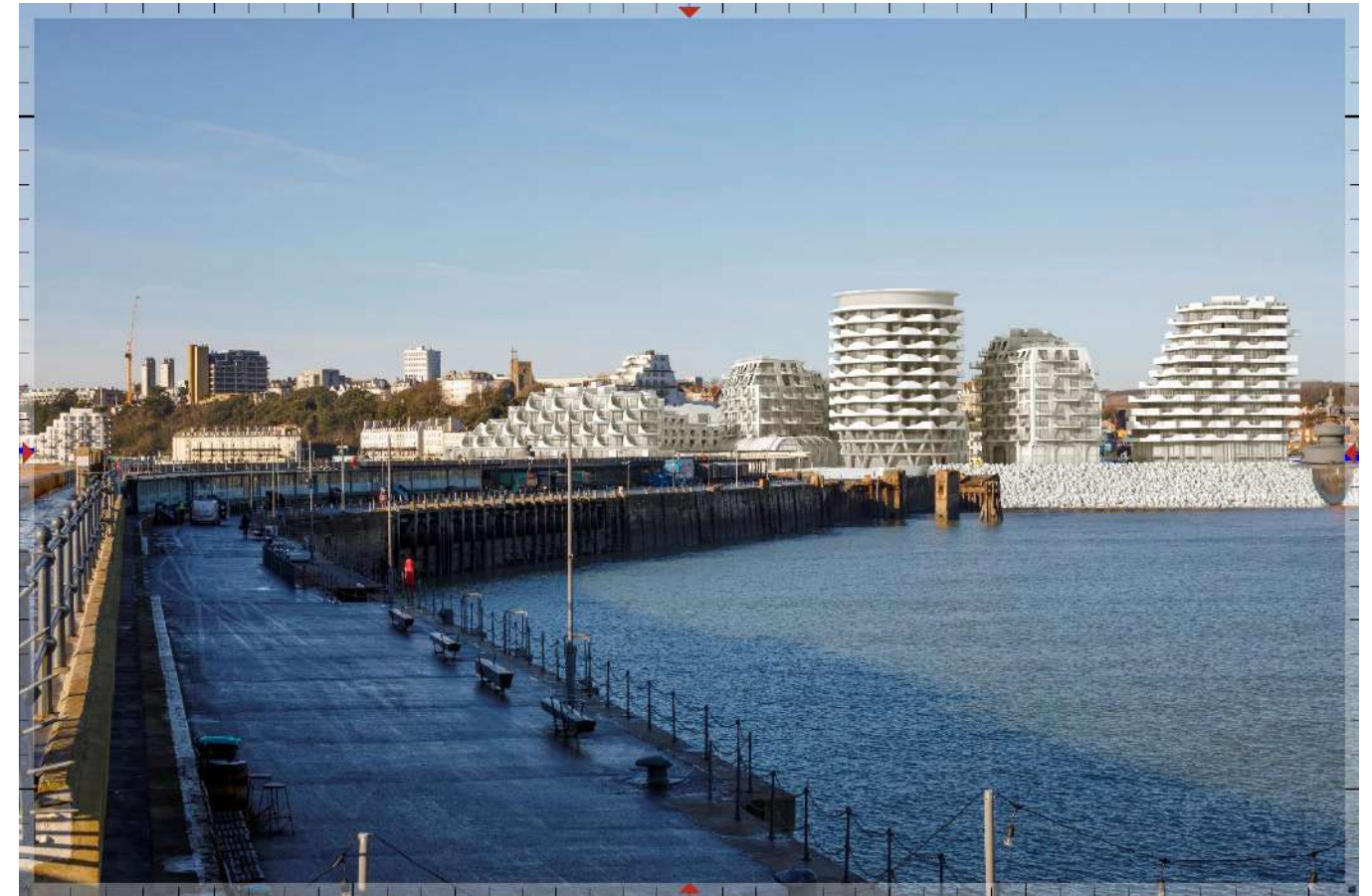
In the middle of the view, the Grand Burstin Hotel takes a dominant position, with its strong modernist form standing out from the landscape and providing a contrast in grain and scale to the finer, linear terraces to the west. In the background, the Grade II listed Foord Valley Railway viaduct can be perceived.

This view will be experienced by pedestrian locals and visitors to the Harbour Arm and Lighthouse, and the view has a medium-high receptor sensitivity due to the site being a key visitor attraction in Folkestone.

Similarity with previous views assessments: The viewpoint location is similar to viewpoint 13 submitted for the s.73 application (Y17/1099/SH) but has been moved closer to the historic platform to capture the proposals which are the subject of this RMA.

View 5 View North from Harbour Arm**Baseline (with consented outline)**

The maximum parameters agreed by the outline planning permission is seen gradually rising up in height and scale towards the east (right) of this view, with the most prominent elements within Plot G1 occupying the middle ground to the centre-right and right, rising above the shoulder height of the remainder of the massing. To the west (left), the massing steps down to meet other consented developments of the Folkestone Masterplan and are set below the level of the cliff (The Bayle and The Leas).

Proposed

In this view, the buildings occupy the middle ground, with the Harbour Arm in the foreground and part of Folkestone's townscape (The Bayle and Leas) seen in the background. The new development will be appreciated in the evolving townscape of Folkestone, alongside other schemes consented as part of the Masterplan.

The careful breaking of massing and introduction of sky gaps creates corridors towards the built form of Folkestone town centre and the wider townscape in the background- Grade II* listed Parish Church of St Mary and St Eanswyth (centre left) and Grade II listed viaduct (seen between buildings 8 and 9).

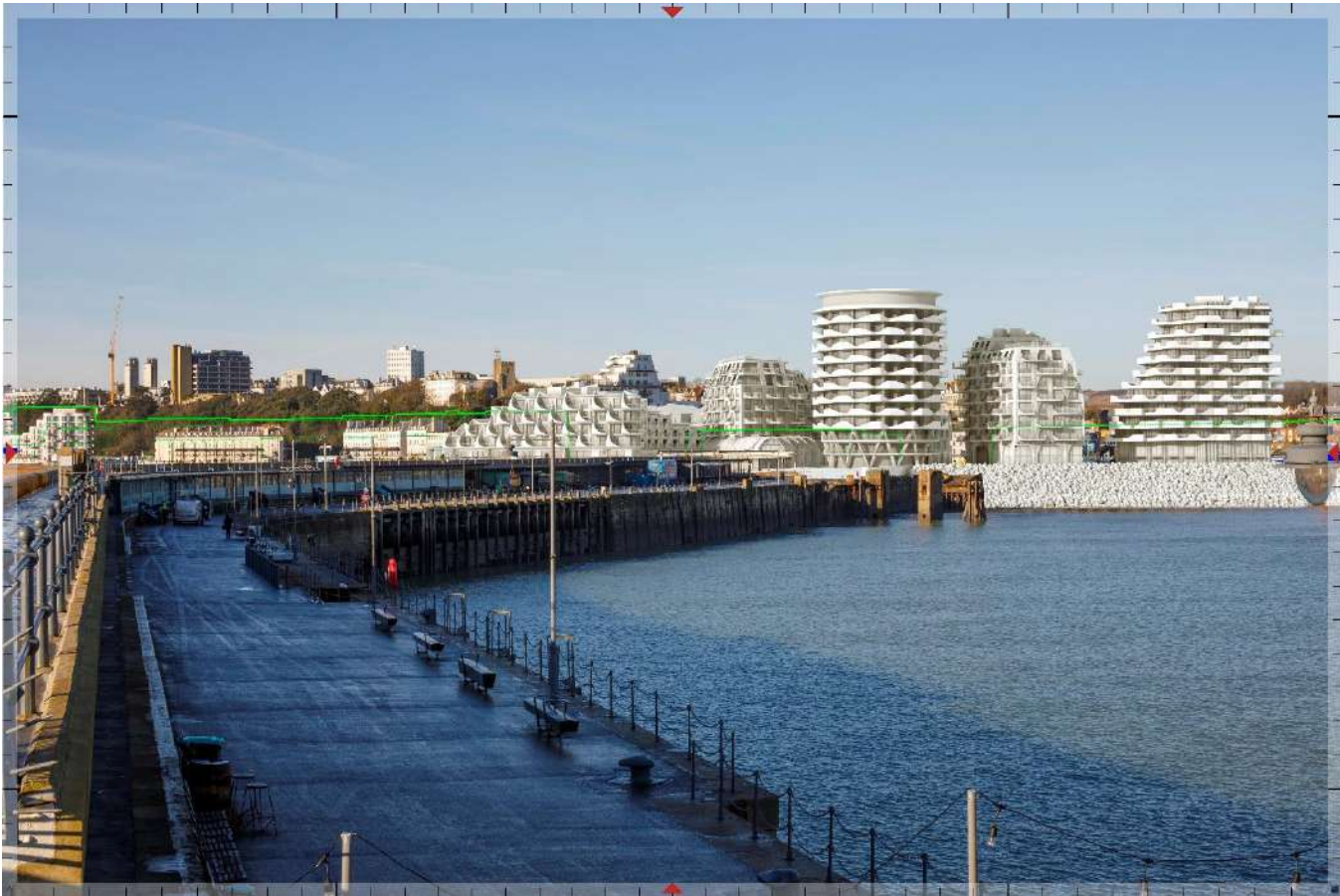
The proposed development on the Harbour plots mirrors the undulation of skyline seen further west in the Leas. Likewise, the careful dividing of massing in this view helps to appreciate the form and design of individual buildings. There is also a sense of layering of built form across the site.

Although the viewer is at some distance from the development in this view, the active and permeable form at ground and lower floors will be discernible, drawing pedestrian movement towards the site and creating a sense of visual interest.

Due to the middle-ground position of the development, within this view the character of the Harbour is unchanged, and the openness is preserved. The proposed built form will be perceived as a collection of new elements, which will contribute to the architectural diversity of the Harbour Area. Overall, the scale of the impact in this view is assessed as being **minor**; and the nature of the impact as being **neutral**.

View 5 View North from Harbour Arm

Proposed (cumulative)

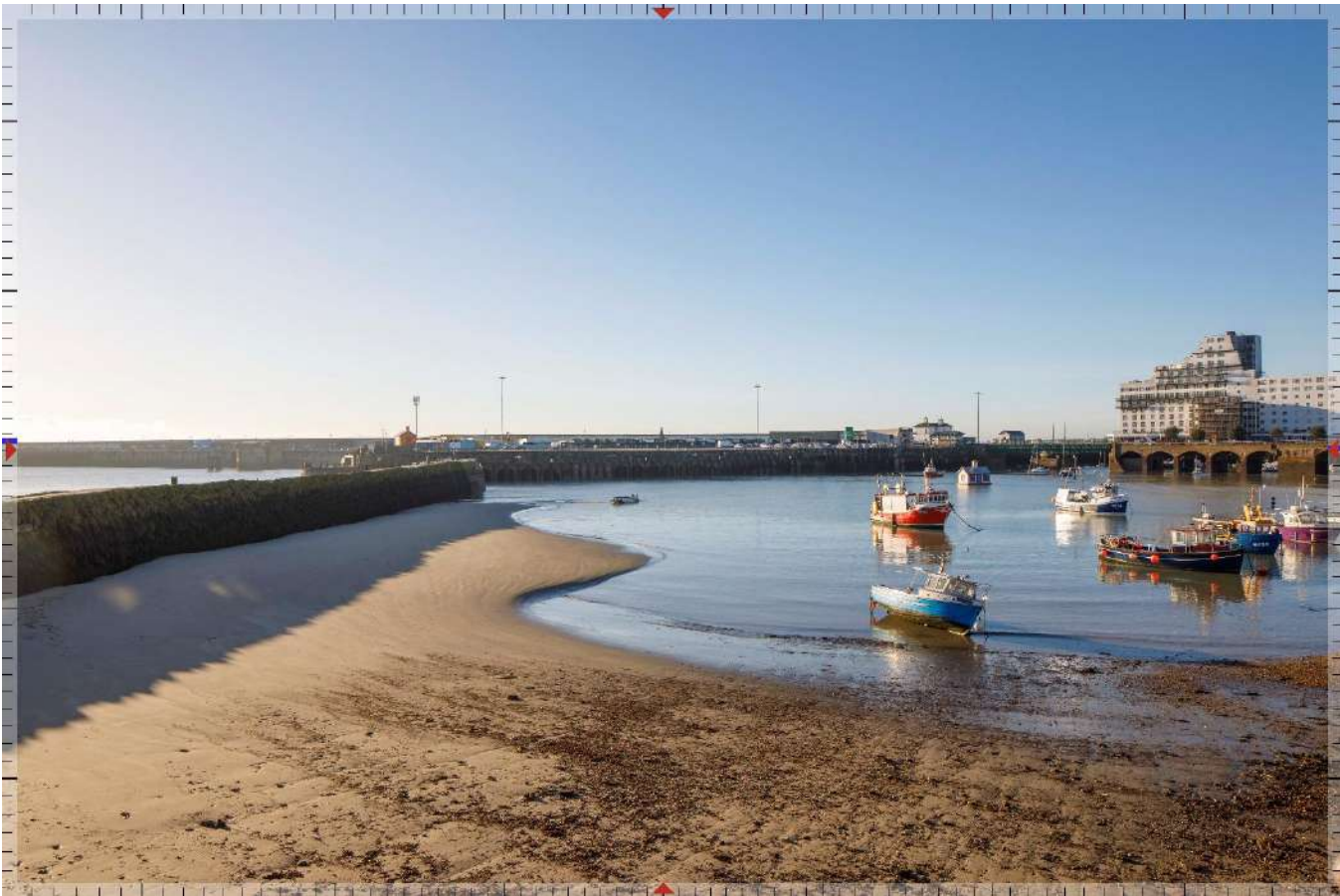


Plots C, D and E, as well as part of Plot B (built) are seen to the left (West) of the development in this view. The scale and design of Plot F1 (Building 1) expresses a similar architectural language utilised by these cumulative developments. The cumulative developments provide a continuity of the Harbour development, along Marine Parade.

Overall, the scale of the impact in this cumulative view is assessed as being **minor**; and the nature of the impact as being **neutral**.

View 6 View from The Stade

Existing



This view aims to capture the relationship between the site (harbour), the East Pier and the outer harbour. The view is taken at the eastern end of The Stade, approximately 250meters away from the northern boundary of the Site, close to its connection with the East Pier. This viewpoint is regularly experienced by local residents as well as tourists, as The Stade serves as a destination with food trucks.

The sandy beach in the foreground lies within the tide area and will be covered by sea water during high tide, creating a scenic view of the Harbour area. The boats coming and going into the Harbour naturally activate the view and create a point of focus.

In terms of the built environment, key elements in this view include the 'outer harbour,' visually framed by the Grade-II listed East Pier on the left and the Grade-II listed Viaduct and Swing Bridge on the right. Facilities associated with the historic Harbour Station, such as the Harbour Master’s House, Signal Control Box, Customs House, and historic platform, are just visible, albeit they are not the key focus of this view and are sited low within the skyline. Beyond the viaduct, the Grand Burstin Hotel rises up introducing a different scale. The view illustrates the historic relationship between the Harbour Station and the Viaduct and Swing Bridge; however, the presence of the Hotel has created a sense of imbalance, emphasising the undefined and empty nature of the Site in its existing context.

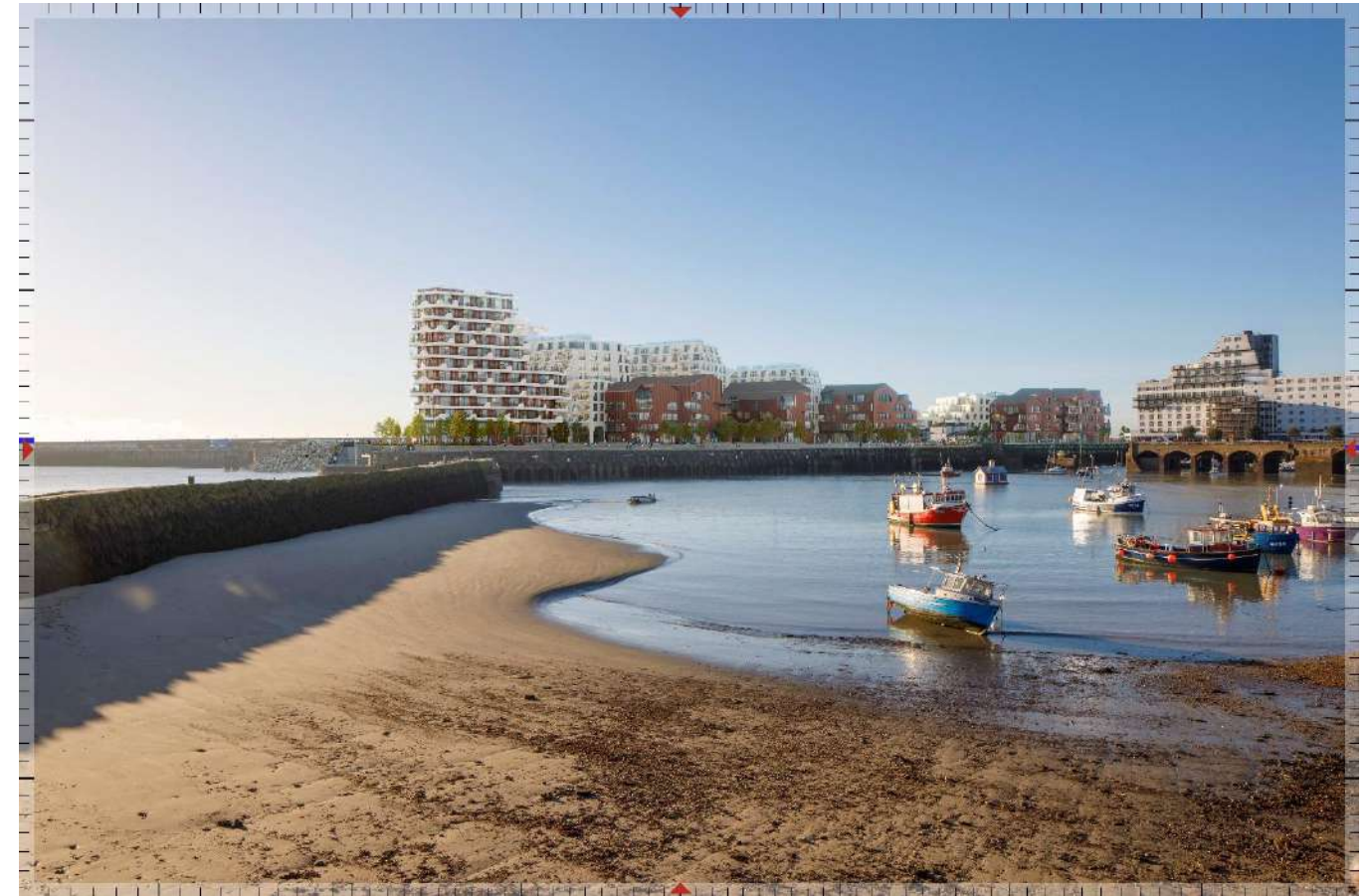
Similarity with previous views assessments: The viewpoint location is similar to viewpoint 15 submitted for the s.73 application (Y17/1099/SH).

Visual Receptors sensitivity	Value of Heritage Assets	Townscape Character Area	Amenity value
Medium	Medium-High (East Pier; Viaduct and Swing Bridge)	View is taken from TCA 2	Medium- High

View 6 View from The Stade**Baseline (with consented outline)**

The massing of maximum parameters agreed by the outline planning permission rises towards the east, with the prominent massing creating a bookend to the development, and steps down towards the other plots which are part of the Masterplan.

The massing incorporates a building located along the northern edge of the harbour, which would disrupt the edge of the harbour and disturb the building line of the proposed development.

Proposed

From this view, the design appears as a continuous frontage, which steps down towards The Grand Burstin Hotel. This massing is somewhat relieved by the variation in materials which help to portray depth and distinction between individual forms, and gaps between buildings allow for a view of the existing townscape in the background.

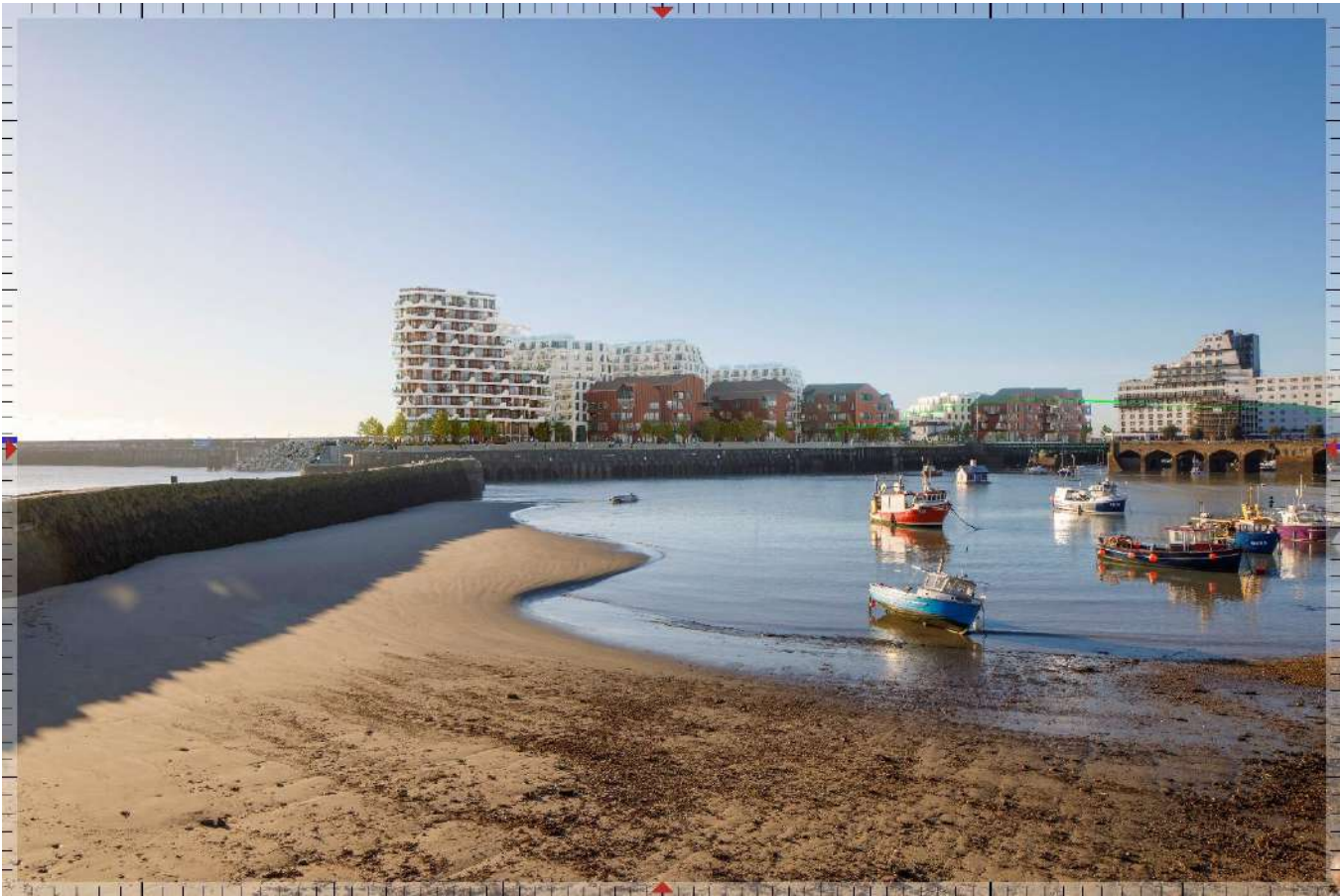
The most prominent and tallest building to the left (Building 9) would have a landmark effect as experienced in this view, creating a punctuation within the skyline and forming a strong terminus to the east (left) side of this view. This reinforces the destination quality of the scheme within this view.

The proposals omit plot G-2, which was consented to provide an 11m high block facing the north of the site, and instead provide a landscaped open space and amphitheatre in this area. This divergence from the outline scheme, ensures a more open foreground to the development when seen from this view.

Overall, the scale of the impact is assessed as being **minor**; and the nature of the impact as being **neutral**.

View 6 View from The Stade

Proposed (cumulative)



Other plots from the Folkestone Masterplan will be screened by the development on the harbour plots but are fleetingly seen to the right (West) of the development in this view. The scale and design of Plot F1 (Building 1) expresses a similar architectural language utilised by these cumulative developments. The cumulative developments provide a continuity of the Harbour development, along Marine Parade. Overall, the scale of the impact in this cumulative view is assessed as being **minor**, and the nature of the impact **neutral**.

View 7 View south along the Viaduct

Existing



This view is located at the northern end of the Grade-II listed Viaduct and Swing Bridge, approximately 170 meters away from the northern boundary of the Site, looking south towards the site. The bridge has been transformed into a public walkway, featuring landscaping works incorporated a pedestrian route and soft and hard landscaping. The landscaping reinforces the linear focus of the view, which draws the viewer’s eye towards the site. As the bridge forms the key pedestrian link to the Harbour, this view is regularly experienced by locals and visitors alike who walk across to visit the harbour. It therefore has a high visual receptor sensitivity.

At the end of the walkway, the Harbour Master’s House, the signal control box, the Customs House, and the historic platform are visible, and the visual legibility of their historical function and connection to the harbour has been preserved. These facilities contribute significantly to the historic landscape and the overall significance of the Bridge, offering one of the best angles to appreciate the historic interest. However, to the left of the view, a car park illustrates the flatness and relative emptiness of the site.

Similarity with previous views assessments: None

Visual Receptors sensitivity	Value of Heritage Assets	Townscape Character Area	Amenity value
High	Medium-High (Viaduct and Swing Bridge)	View is taken from TCA 1	High

View 7 View south along the Viaduct**Baseline (with consented outline)**

The design consented as part of the outline masterplan includes an almost solid and continuous wall of massing, broken by the railway platforms and with little relief or variation in heights, except to the east (right) where the tallest element is expressed as part of Plot G1.

Plot G2 appears in the foreground, breaking ahead of the established building line, and disturbing the focus with the northern edge of the harbour.

Proposed

The proposed development is prominently seen in the middle-ground within this view, with the restored viaduct (Grade II) forming the foreground, and main pedestrian link to the Harbour development. The landscaping design integrates the viaduct with the development, while providing a sense of progress towards the site, and the destination quality of the site is reinforced by the conservation of the viaduct and swing bridge, and creation of a pedestrian link.

The development is seen as a continuous frontage, but divided with sky and shadow gaps, which express the depth and layering of the site. Red clad buildings with a warehouse, wharfside typology, in the foreground are visually interesting and characterful, and are of a scale reminiscent of Folkestone town. These provide a visual interface between the town and the Harbour development.

Due to the tonality of buildings in the background, the viewer loses an appreciation of the Harbour Master's House in this view, which blends with building situated beyond it, removing the opportunity to appreciate the skyline of the locally listed building as provided in the existing context.

The proposals omit the creation of built form on plot G2, consented to provide a 11m high block facing the north of the site, which would have blocked part of Buildings 7 and 9 in this view. Instead, the design has been amended to a landscaped open space and provided with an amphitheatre in this area. This opens the foreground of the development when seen from this view, and better integrating the built form with the site. Overall, the scale of the impact in this cumulative view is assessed as being **minor**; And the nature of the impact **neutral**.

View 8 View from the Harbour Fountains

Existing



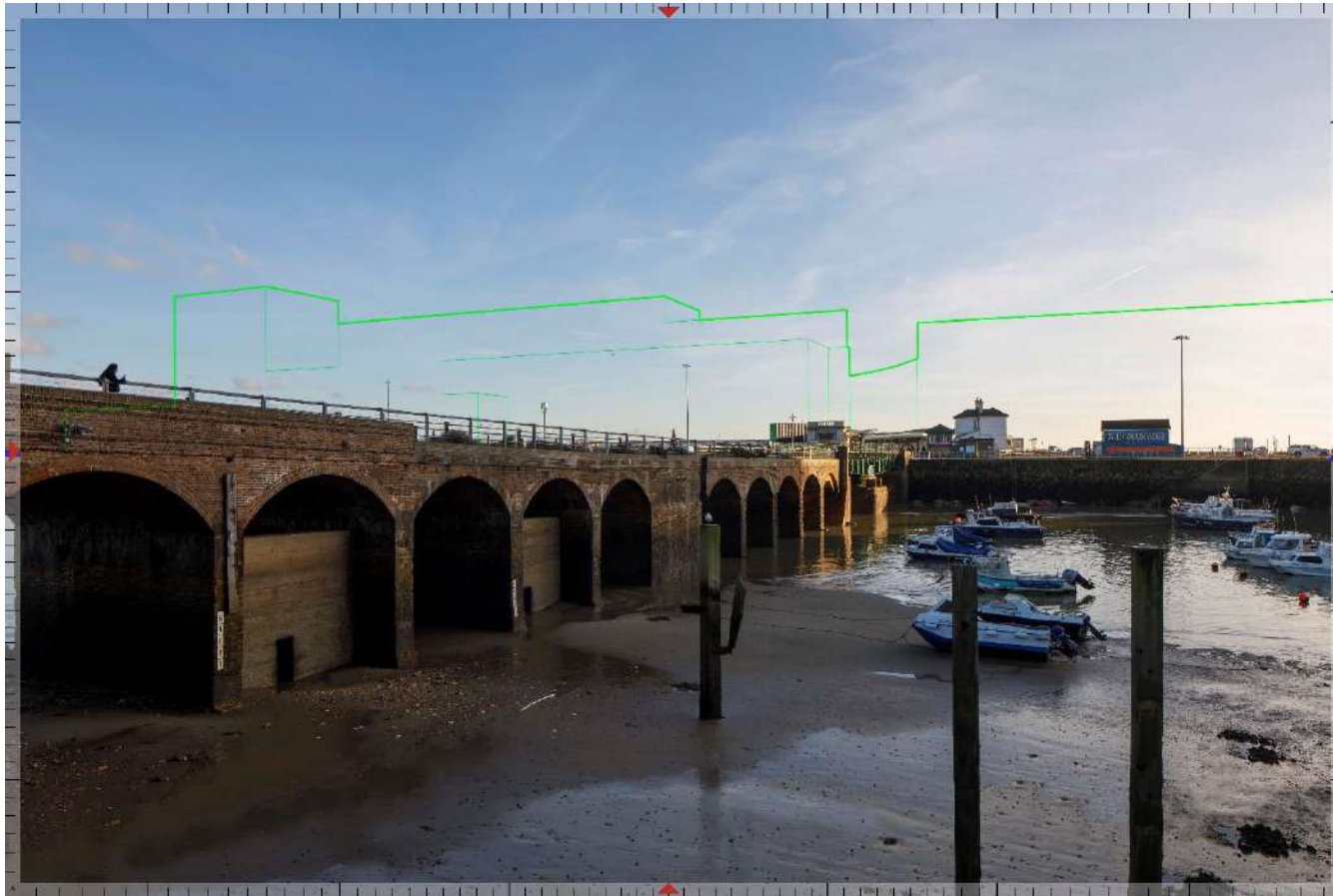
This viewpoint is captured from the Harbour Fountains, approximately 150 meters away from the northern boundary of the Site, providing a perspective on the visual relationship between the Harbour, the Viaduct Bridge, and the inner Harbour area, currently used by private ship crafts. The view is also divided into a lower and upper register, with an emphasis on horizontality. The sandy area in the foreground is only revealed when the tide is low, and the view is dynamic as it changes with the tide. This view is mainly experienced by visitors to the Harbour Fountains.

The focus of the view is the Grade-II listed Swing Bridge, which extends from the foreground of the view and towards the southern part of the Harbour (the subject Site). It is made prominent by its arched form and materiality, as well as its position in the view. The Harbour Master’s House, the Signal Control Box, and the Customs House are partially visible, as elements within the skyline, and the visual legibility of the historical function of the harbour and its extant components has been preserved.

This view preserves a sense of openness both in the foreground to the right, as well as in the background, due to the sparse nature of built form on the harbour.

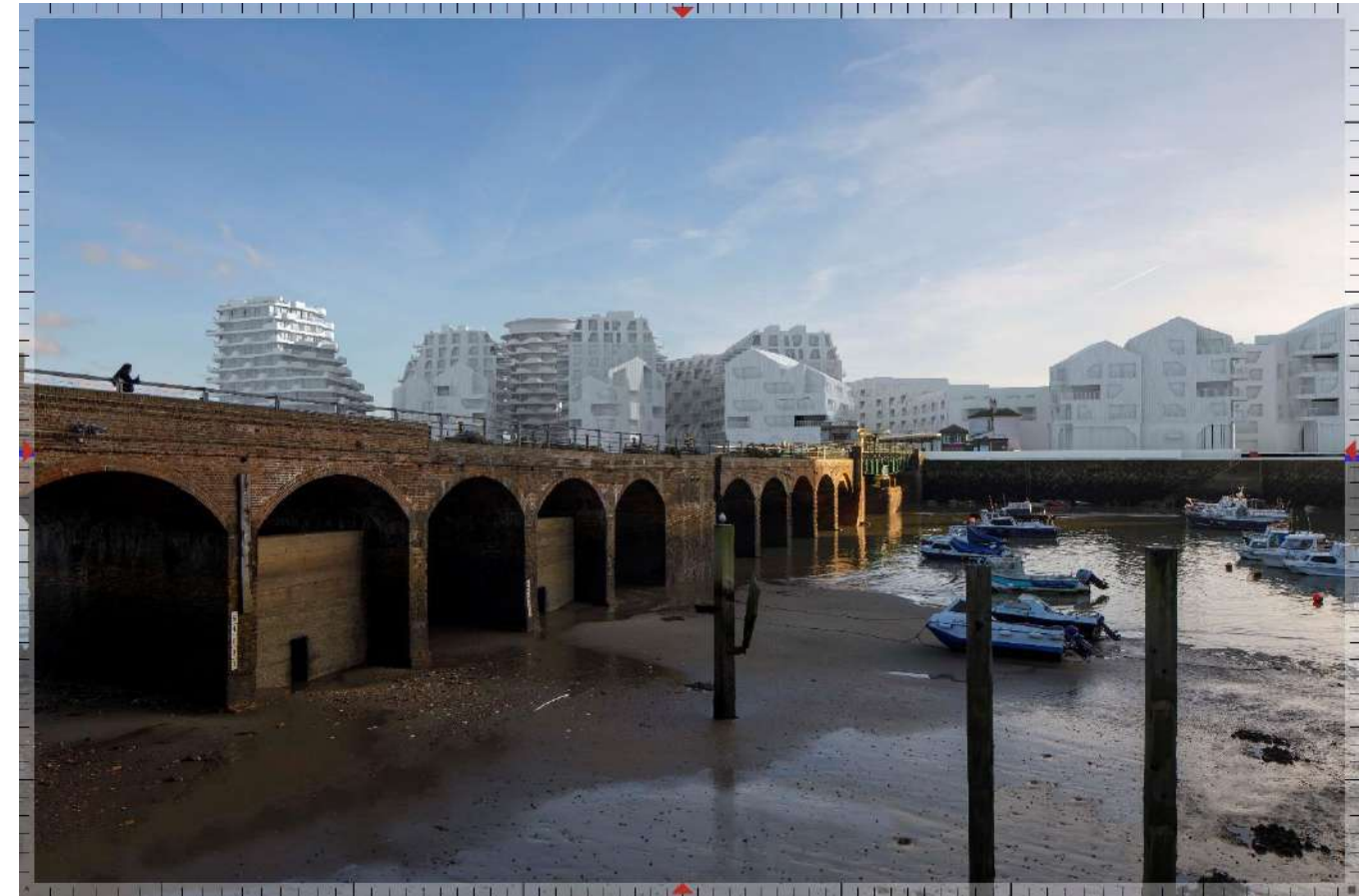
Similarity with previous views assessments: This viewpoint is similar to View 11 of the Masterplan Application (Y17/1099/SH); but slightly amended to respond to the development included within this RMA.

Visual Receptors sensitivity	Value of Heritage Assets	Townscape Character Area	Amenity value
Medium	Medium (Viaduct and Swing Bridge)	View is taken from TCA 2	Medium

View 8 View from the Harbour Fountains**Baseline (with consented outline)**

The design consented as part of the outline masterplan includes an almost solid and continuous wall of massing, broken by the railway platforms and with little relief or variation in heights, except to the east (right) where the tallest element is expressed as part of Plot G1.

Plot G2 appears in the foreground, breaking ahead of the established building line, and disturbing the focus with the northern edge of the harbour, and unbalancing the form of the viaduct.

Proposed

The proposals are seen above the strong horizontal line created by the Viaduct bridge and the plinth of the Harbour.

The viaduct seen in the foreground to the left, has a strong architectural form and character, which is retained despite the visibility of the proposed development. Notwithstanding the change in visual enclosure and the conspicuousness of the scheme, the focus of this view remains with this principal architectural and historic feature.

The development creates a new layer of built form within the currently open view, when viewed from this location and perspective, the scheme presents a continuous building line. The materiality of individual buildings, particularly the red toned buildings in the foreground (north side), contrasted with white buildings in the background would help create a layered appearance, breaking the density of the massing as experienced in this view.

Due to the tonality of buildings in the background, the viewer loses an appreciation of the Harbour Master's House in this view, which blends with the light-coloured building situated beyond it, removing the opportunity to appreciate the individual form of the locally listed building as is currently provided in the existing context. It should be noted that the non-designated heritage asset was consented for demolition as part of the outline scheme and so the preservation of the building and its integration into the scheme is an improvement from the baseline situation.

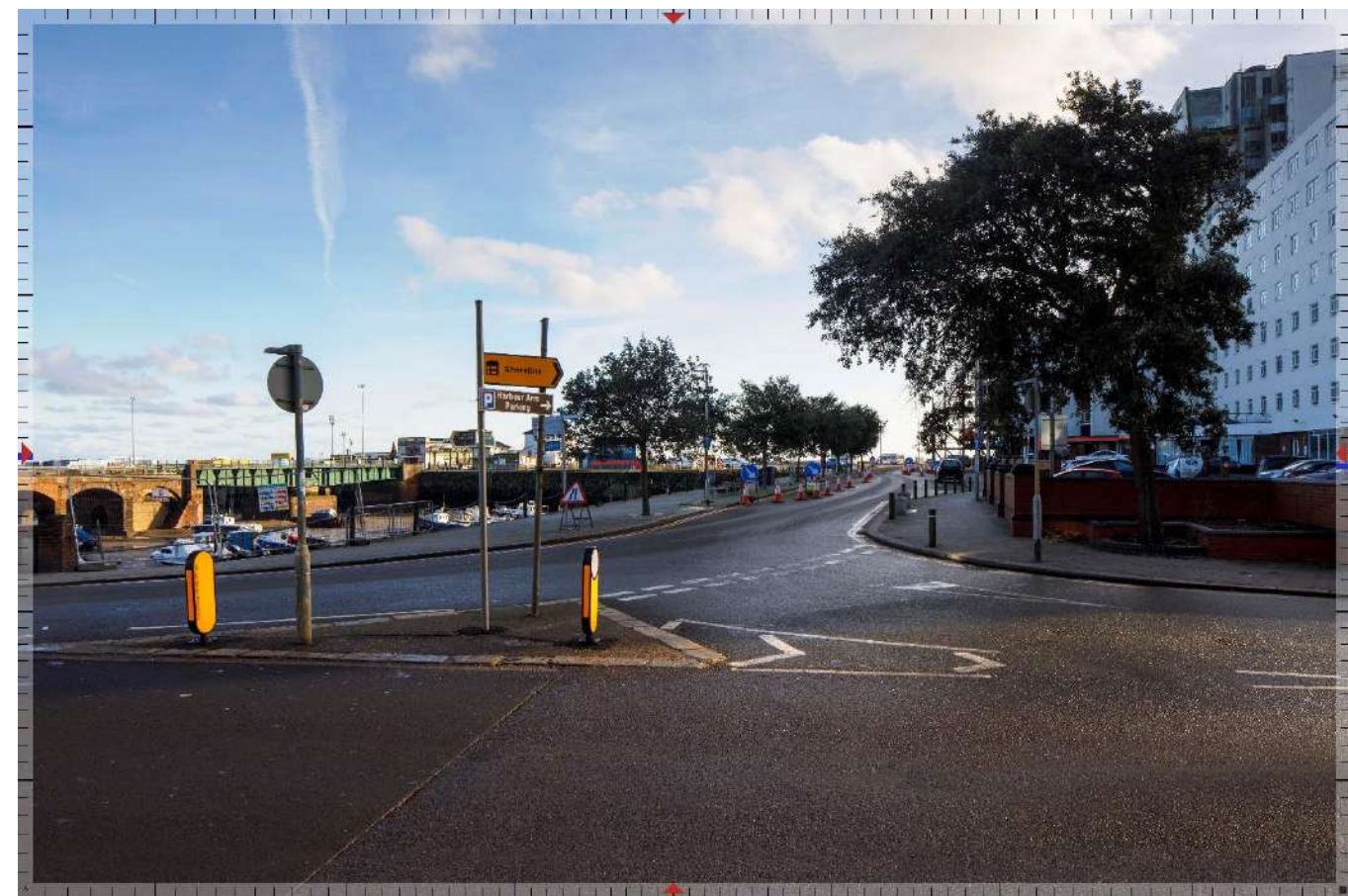
The form and design of various buildings within the scheme are striking and individualistic; building materials and architectural detailing will tie them together with a shared architectural language, as is expressed from other locations such as View 4.

As the proposals omit built form on Plot G2, the gap between Buildings 7 and 9 is better expressed, when seen in this view. The buildings are also suitably set back from the northern edge of the Harbour, softening the overall impact of the massing.

Overall, the scale of the impact in this cumulative view is assessed as being **minor**, and the nature of the impact **neutral**.

View 9 View south from the intersection of Harbour Approach Road and Harbour Street

Existing



This view is captured from the junction of Harbour Approach Road and Harbour Street, approximately 130 meters away from the north-western corner of the Site, facing southward towards the beach. The view illustrates the relationship between the Grade-II listed Viaduct and Swing Bridge and its setting within the Harbour area.

Located at a location with busy traffic, this view will primarily be experienced by pedestrians, road-users and visitors to the Grand Burstin Hotel and the Old Town Centre. With the restoration of The Princess Royal and revitalisation of the square immediately south of it, this viewpoint location will have greater public use, and this may enhance the visual receptor sensitivity. Although at present, this view is incidental in character, with receptors most likely focused on wayfinding.

The Grand Burstin Hotel is peripheral in the view, and experienced obliquely, framing the western (right) side of the view. The inner harbour can be partially experienced from this location, with the Grade II listed Viaduct Bridge in the background. Street trees along Harbour Approach Road partially screen the built forms which front the road and contribute to the greening of the view.

Similarity with previous views assessments: The viewpoint location is similar to viewpoint 10 submitted for the s.73 application (Y17/1099/SH) but has been moved closer to the historic platform to capture the proposals which are the subject of this RMA.

Visual Receptors sensitivity	Value of Heritage Assets	Townscape Character Area	Amenity value
Medium	Medium (Viaduct and Swing Bridge)	View is taken from TCA 2	Low- Medium

View 9 View south from the intersection of Harbour Approach Road and Harbour Street

Baseline (with consented outline)



As with the baseline of View 8, the design consented as part of the outline masterplan includes an almost solid and continuous wall of massing, with little relief. There is a gradual stepping down of massing towards the west (right) of this view, where the proposed development would meet other consented schemes as part of the Masterplan.

Proposed



This is an incidental view and looks towards the western part of the proposed development on the Harbour front. The development is perceived as dense, and the lack of noticeable sky gaps between buildings accentuates this solid and continuous massing from this viewpoint. Nevertheless, this is relieved by the interesting form of the roofline (breaking the upper levels of the proposal), articulation of individual buildings and will be further softened by the materiality and tonality of the buildings.

The trees in the foreground further soften the design and provide a partially screened view of the development. Overall, the scale of the impact is assessed as being **minor**, and the nature of the impact **neutral**.

View 9 View south from the intersection of Harbour Approach Road and Harbour Street

Proposed (cumulative)

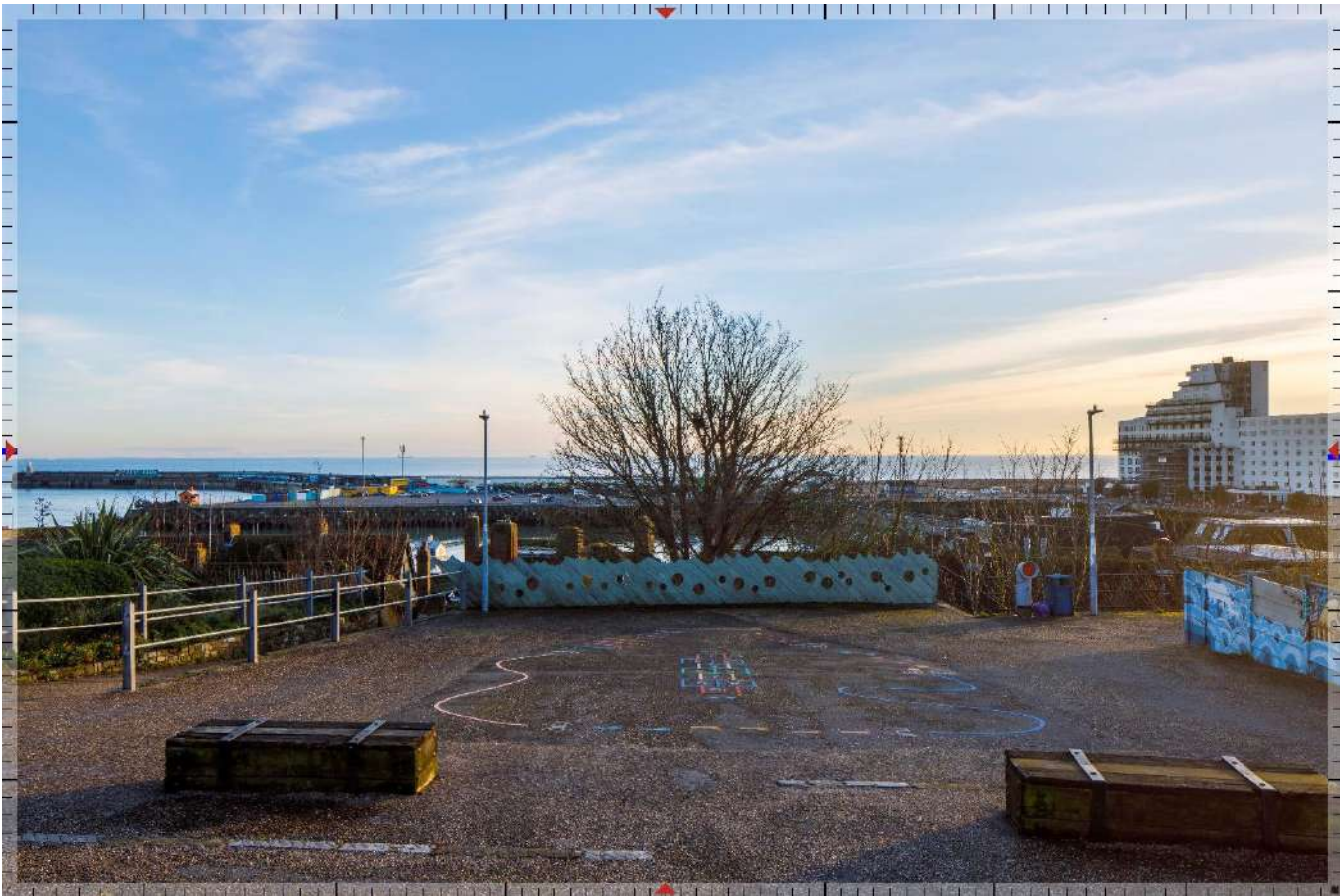


The edge of Plot E will be glimpsed to the left of the Grand Burstin, and at the end of the visual axis of Harbour Approach Road and occupy a part of the sky gap. Nevertheless, the massing of buildings retains a gap between the plots and Plot F1 will be seen next to Plot E and will follow a similar visual design language and materiality.

Seen in the context of other consented developments, the scale of the impact in this cumulative view is assessed as being **minor**, and the nature of the impact **neutral**.

View 10 View south from the St Peter’s School playground

Existing



This view is captured from The Durlocks Bank (formerly the Old Drying Ground), approximately 220 meters away from the northern boundary of the Site, situated on the upper hill to the north of the Harbour. This viewpoint is located within the playground between the upper hill and The Stade and is mainly experienced by pedestrians and residents of The Durlocks, as well as users of the playground associated with the school (St Peter’s C of E Primary School). Benches in the setting of the viewpoint highlight that this is a vantage point from which people are intended to sit and experience the view. The view will sometimes be naturally activated by children utilising the playground.

Foliage in the middle-ground partially screens the view of the Harbour, especially during the summertime. This view provides an open aspect of the harbour area, although the eye is drawn to the Grand Burstin Hotel which projects above the horizon line and frames the right-hand side of this view.

The Grade-II listed lighthouse to the left of this view is visible at the end of the Harbour Arm and provides a counterpoint to the upright structure of the Grand Burstin Hotel at the opposite end of the scene. Other heritage assets such as the Viaduct/ Swing bridge and east pier are obscured by vegetation and other built form/ topography in this view. The non-designated heritage assets within the harbour are also concealed from this view by vegetation.

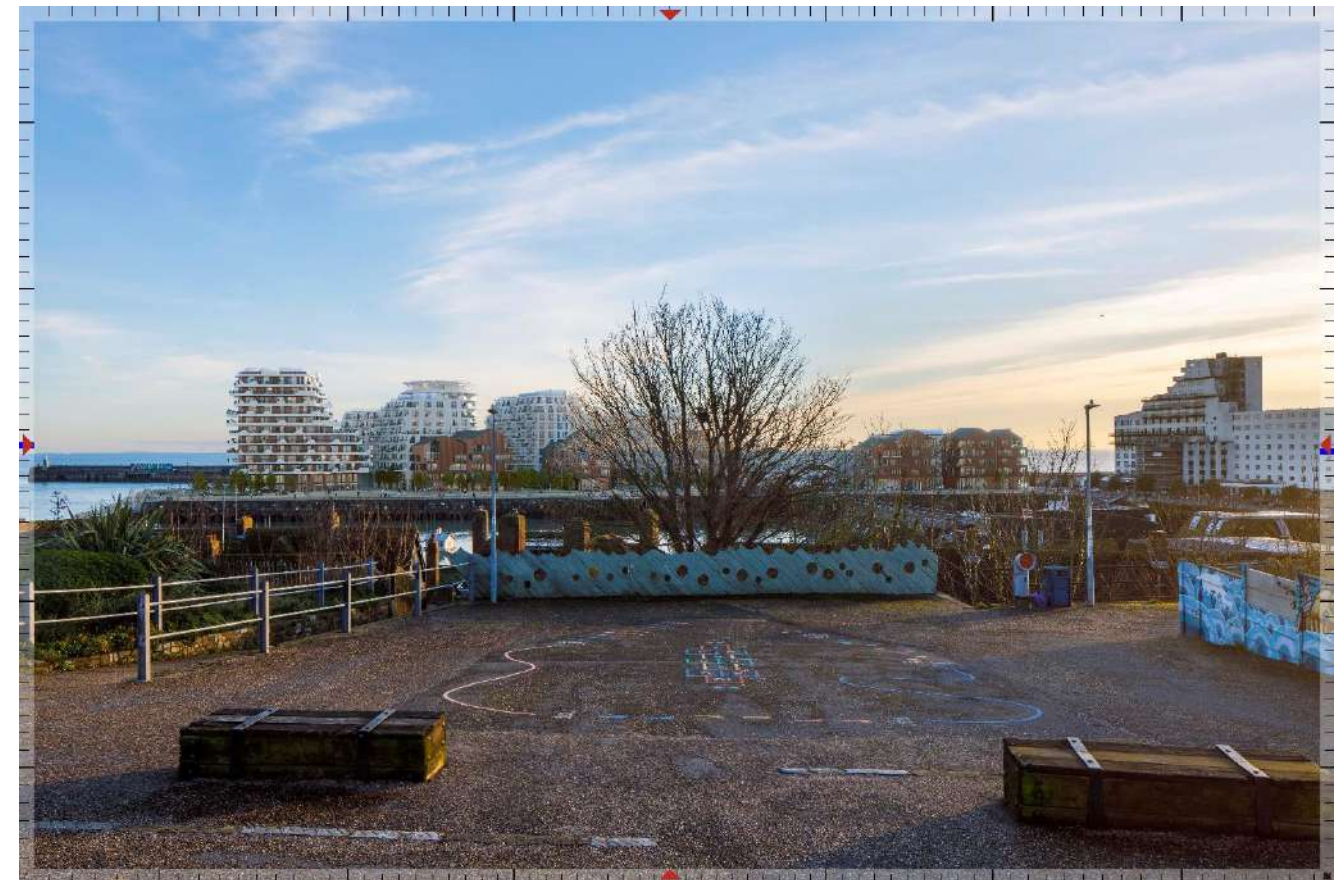
Similarity with previous views assessments: The viewpoint location is similar to viewpoint 16 submitted for the s.73 application (Y17/1099/SH) but has been moved closer to the historic platform to capture the proposals which are the subject of this RMA.

Visual Receptors sensitivity	Value of Heritage Assets	Townscape Character Area	Amenity value
Medium-High	Low-medium (Lighthouse)	View is taken from TCA 3	High

View 10 View south from the St Peter's School playground**Baseline (with consented outline)**

The design consented as part of the outline masterplan includes an almost solid and continuous wall of massing. From this view, some variation in height is noticeable, with Plot G1 being the tallest element to the east (left) and gradually stepping down westward. The continuity of the massing is interrupted by the railway platforms, although this visual experience will likely be partially screened by the informal vegetation.

Plot G2 appears prominently in the foreground, breaking ahead of the established building line and disrupting the visual focus with the northern edge of the harbour.

Proposed

The proposed development is seen in the background and this view provides an appreciation of the complete northern face of the design. Overall, it provides a satisfying architectural composition, with a layered design realised by the use of different materials, roof forms and through the introduction of gaps between buildings, which allow for some appreciation of the horizon.

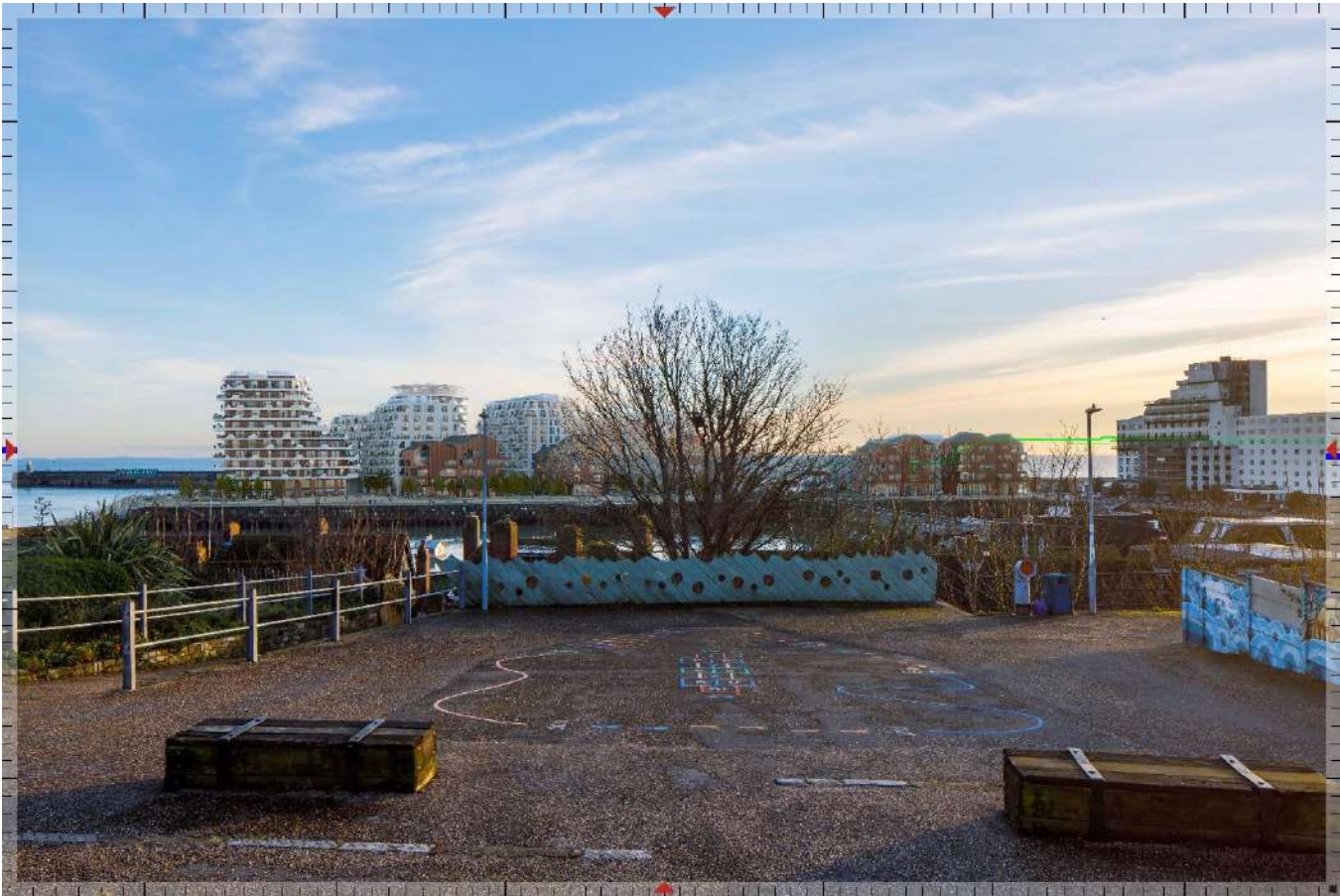
The massing steps down towards The Grand Burstin to the right, somewhat lessening its impact; and also towards the fore (north side) of the development, better integrating the site with the scale of Folkestone's built form.

The proposals omit built form on Plot G2, therefore setting back the line of development away from the northern edge of the Harbour, and landscaping/ hardscaping this area to provide a better integration of buildings with the site.

Overall, the scale of the impact is assessed as being **minor-moderate**, and the nature of the impact **neutral**.

View 10 View south from the St Peter’s School playground

Proposed (cumulative)

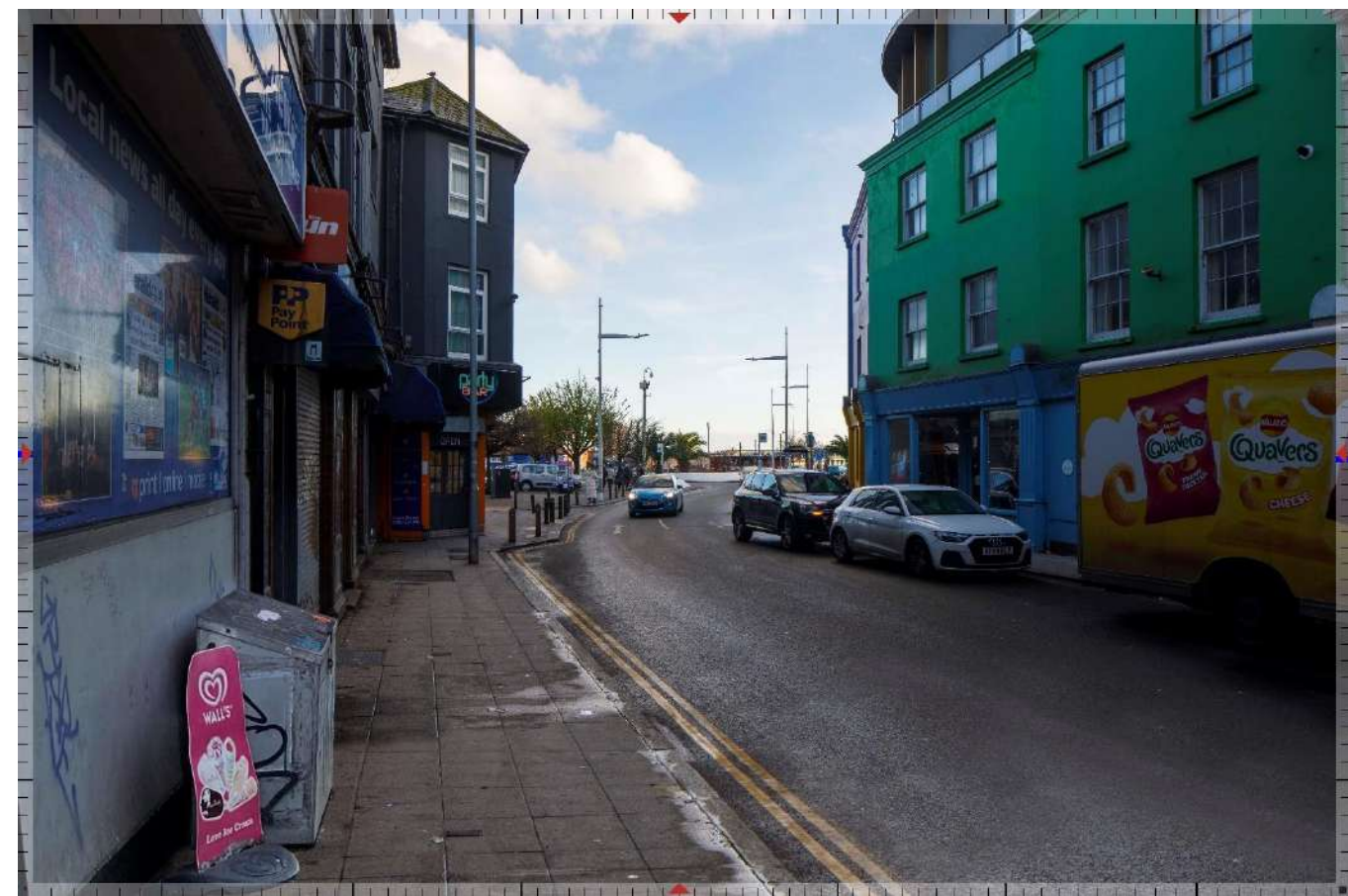


The edge of Plot E will be glimpsed to the left of the Grand Burstin, and seen as part of the background, occupying a part of the sky gap. Plot F1 follows a similar visual design language and materiality as Plot E, and the Harbour development steps down towards these cumulative developments.

Overall, the scale of the impact in this cumulative view is assessed as being **minor**, and the nature of the impact **neutral**.

View 11 View from Tontine Street

Existing



Visual Receptors sensitivity	Value of Heritage Assets	Townscape Character Area	Amenity value
Medium-High	Low	View is taken from TCA 5	Low

This view is captured from the southern end of Tontine Street, where it intersects with Harbour Street and Harbour Approach Road. Positioned roughly 200 meters away from the northern boundary of the Site, it will primarily be experienced by road users and pedestrians frequenting the modern high street.

Located within the southern section of the Folkestone Leas & Bayle Conservation Area, this viewpoint embodies the pedestrian experience within the historic town centre of Folkestone and the current visual connection with the Harbour. The curved alignment of Tontine Street, flanked by modern structures on both sides, restricts the visibility of the Harbour from this vantage point, resulting in a pronounced sense of enclosure. Consequently, the focus of the receptor is primarily centred on the foreground and the surrounding street scene, which is activated by shop fronts and traffic.

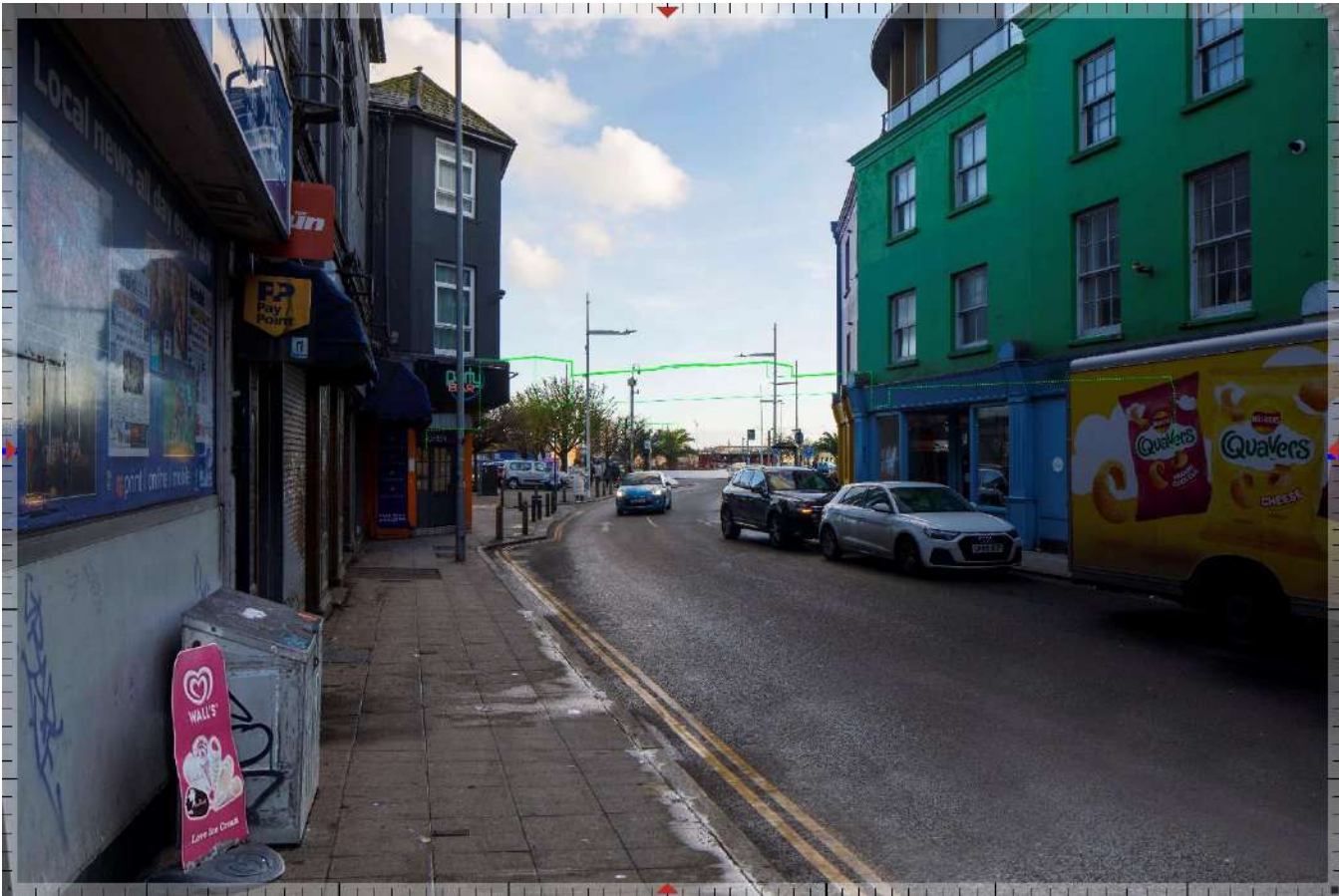
The view takes in the mixed residential and commercial character of this stretch of Tontine Street.

In the background, the Harbour Fountains mark the terminus of Tontine Street. The Grade-II listed Viaduct and Swing Bridge are just visible beyond the Harbour Fountains but are not readily perceived owing to partial screening by parked cars and interposing street furniture.

Similarity with previous views assessments: This viewpoint is similar to View 19 of the Masterplan Application (Y12/0897/SH); but slightly amended to respond to the development included within this RMA.

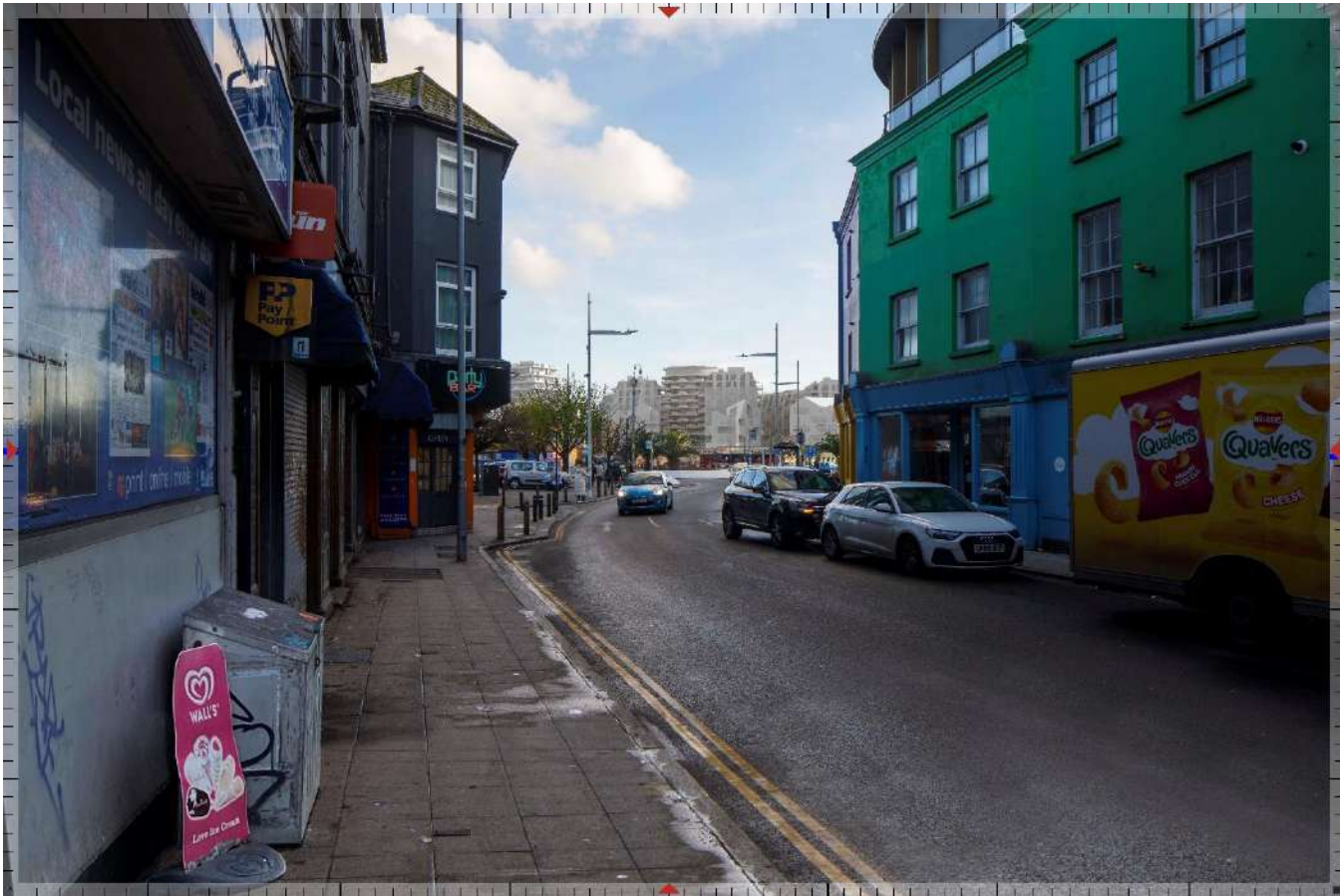
View 11 View from Tontine Street

Baseline (with consented outline)



The design consented as part of the outline masterplan includes an almost unbroken and continuous wall of massing. This design feature is anticipated to exacerbate the already restricted sense of openness within the area. While there is a gradual reduction in massing towards the west (right), this aspect may not be fully discernible from this particular perspective.

Proposed



The proposed development is seen in the background and will form a focal point when seen along views of Tontine Street. This would lend a destination quality to the Harbour, as seen in this view.

The roofline of the proposed development is well articulated in this view and gaps can be seen between the buildings, which would allow for a view of buildings beyond. The variation in form, materiality and texture of individual buildings will add to the visual interest of the site as a background element.

Overall, the scale of the impact is assessed as being **minor**, and the nature of the impact **beneficial**.

View 12 View southeast from the Parade Steps

Existing



Located on the steps leading between the Harbour and The Parade, this vantage point provides a view of the Harbour and the historic platform that is framed by the Grand Burstin Hotel to the west (right) and the Harbour Inn to the east (left). Serving as a popular pedestrian footpath connecting the hill and parking areas, this view is likely to be experienced by visitors and locals; and the visual sensitivity is likely to increase with the revitalisation of The Princess Royal Pub and open space to its south.

Despite being partially obscured by foliage and railings, this view encapsulates the evolution of Folkestone as a seaside town. The Harbour Inn on the left and the Grand Burstin Hotel on the right dominate the scene, representing key developments in the town's history as a tourist destination and accommodation for boat-train transportation. In the centre of the view lies the inner Harbour and the Harbour Master's House, representing the historical use of the Harbour Station. The Grade-II listed Viaduct and Swing Bridge stand as remnants of facilities that once served the removed station. The Harbour Arm and the Grade-II listed Lighthouse are also visible. Collectively, these elements offer a historical perspective on the changing use of the Harbour area and its setting.

Similarity with previous views assessments: This viewpoint is similar to View 20 of the Masterplan Application (Y12/0897/SH); but slightly amended to respond to the development included within this RMA.

Visual Receptors sensitivity	Value of Heritage Assets	Townscape Character Area	Amenity value
Medium-High	Medium (Viaduct and Swing Bridge; Lighthouse; Harbour Master's House)	View is taken from TCA 6	High

View 12 View southeast from the Parade Steps**Baseline (with consented outline)**

The design consented as part of the outline masterplan includes an almost solid and continuous wall of massing. From this view, some variation in height is noticeable, with Plot G1 being the tallest element to the east (left) and gradually stepping down westward. The continuity of the massing is interrupted by the railway platforms, although this visual experience is partially occluded by the interposing vegetation.

Proposed

The proposed development on the Harbour can be appreciated in the middle ground of this image, with The Grand Burstin to the right. The built form of the proposed development fills the townscape gap experienced in the centre of the view, and there is an appreciation of its relationship with the sense of openness (foreground and background) and immediate context of the Harbour site in this view.

The continuous building line of the development is relieved by a layering of built form, expressed through different building materials, with gaps between buildings allowing a glimpse into buildings in the background. The red clad, wharf like buildings are characteristic of water edge developments, and provide a more domestic scale that relates to the neighbouring context. Importantly they provide a key interface between the town and developments further in the background.

The sky gap between Buildings 1 (Plot H) and the Grand Burstin provide a glimpse of the horizon beyond, somewhat aiding an appreciation of the permeability of the development.

The Harbour Master's House and Swing Bridge are perceived within the development, although the prominence of the former is reduced by the appearance of the new built forms beyond it. Notwithstanding this, one is still able to appreciate the historical enclosure of the Harbour from this location.

Overall, the scale of the impact is assessed as being **minor**, and the nature of the impact **neutral**.

View 12 View southeast from the Parade Steps

Proposed (cumulative)



The edge of Plot E will be glimpsed to the left of the Grand Burstin, but largely screened by the existing massing of the hotel. The massing of buildings retains a gap between the plots when seen in this view, and Plot F1 will be seen next to Plot E and will follow a similar visual design language and materiality.

Overall, the scale of the impact in this cumulative view is assessed as being **minor**, and the nature of the impact **neutral**.

View 13 View from The Bayle

Existing



Visual Receptors sensitivity	Value of Heritage Assets	Townscape Character Area	Amenity value
Medium-High	Medium-High (The British Lion Inn; nos.12, 14, 16, 18, 26, 28, 30, 32 The Bayle)	View is taken from TCA 6	Medium-High

This view is experienced from The Bayle, which forms one of the earliest developed streets in Folkestone, and which has a strong residential character. Positioned at the turning corner of The Bayle, approximately 250 meters away from the north-western corner of the site, it offers a rare openness allowing a view of the Channel and coastline in this vicinity. Local residents and visitors to the British Lion Inn, as well as the Parish Church of St Mary and St Eanswythe, will have the opportunity to experience this view.

This view encapsulates an area of hardstanding used for resident parking flanked by several Grade-II listed buildings of the 18th century, including the British Lion Inn, nos.12, nos. 14 &16, no.18, nos. 26 & 28, and nos. 30 & 32 The Bayle, which all falls within the Folkestone Leas & Bayle Conservation Area. The view towards the sea is framed by the enclosing-built form to either side of the Bayle, albeit the openness of this vista has been altered by the Grand Burstin Hotel which projects above the horizon line.

Similarity with previous views assessments: The viewpoint location is similar to viewpoint 21 submitted for the s.73 application (Y17/1099/SH).

View 13 View from The Bayle

Baseline (with consented outline)



The design consented as part of the outline masterplan includes an almost unbroken and continuous wall of massing. However, only the taller sections of these developments will be visible from this viewpoint, and their massing is not expected to surpass the height of the Grand Burstin Hotel.

Proposed



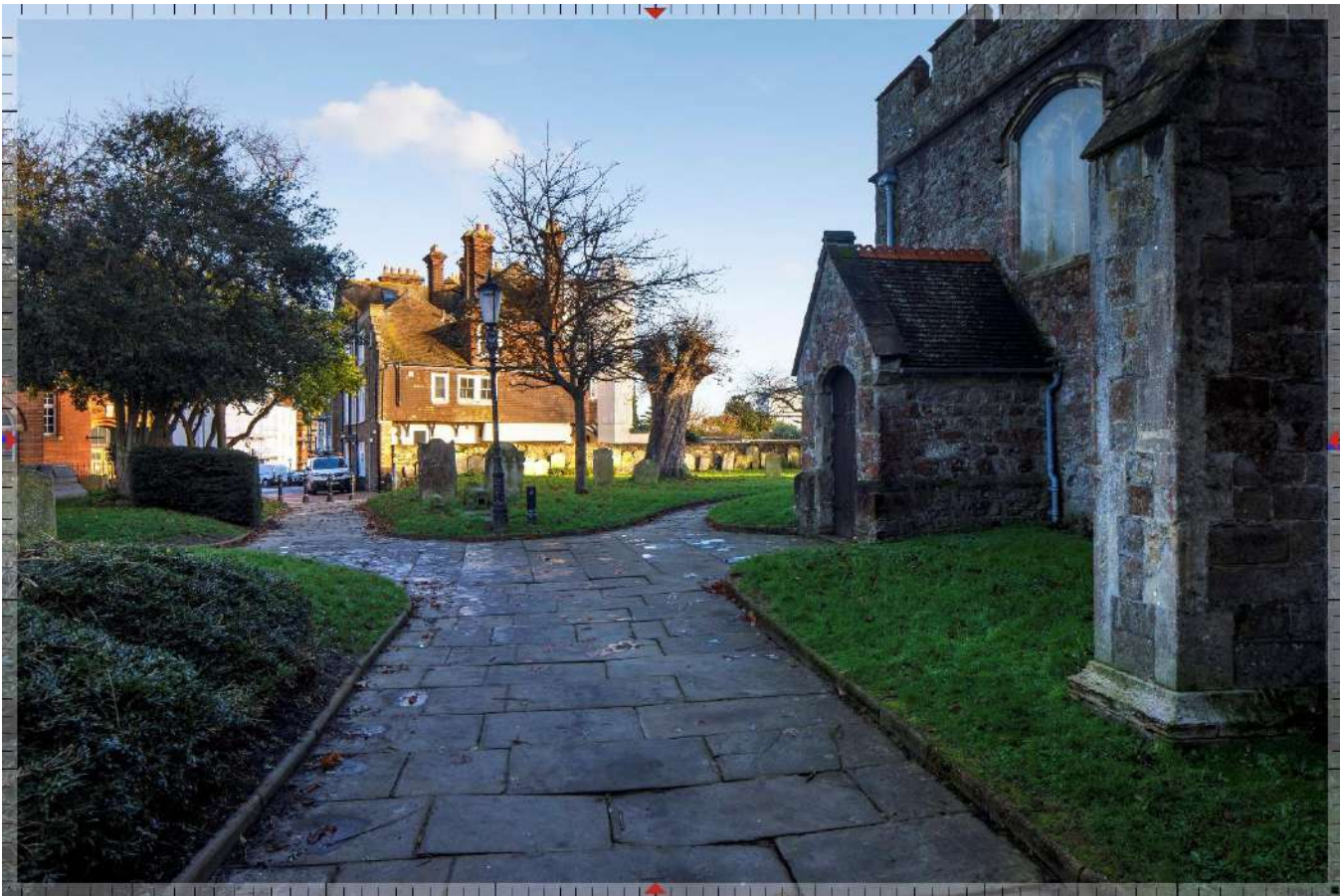
The proposed development will be perceived as a background feature in this view and is partly screened by foliage and other elements in the middle ground. The principal elements of character of in The Bayle are in its historic buildings and street scenes, and their relationship to each other, the Harbour development will be peripheral to the experience of the local townscape in this view.

The interesting roofline and form of the development, and sky gaps between buildings seen in this view would further lessen any impact of the massing in the background.

Overall, the scale of the impact is assessed as being **minor**, and the nature of the impact **neutral**.

View 14 View from the churchyard of St Mary & St Eanswythe, The Bayle

Existing



Visual Receptors sensitivity	Value of Heritage Assets	Townscape Character Area	Amenity value
Medium-High	High (The Parish Church)	View is taken from TCA 6	High

This view is from the churchyard of the Grade-II* listed Parish Church of St Mary & St Eanswythe, approximately 300 metres away from the north-western corner of the site. The foreground of the view is taken up by the church building and its northern churchyard, which contains several Grade-II listed structures, including the stone pavement, the sundial (to the left of the view), and the bollards separating the churchyard from the roadway, The Bayle. In the middle ground, partially screened by mature trees within the churchyard, the Grade-II listed Priory House stands at the centre of the view, situated right behind the boundary wall. The built form contributes to the character of the scene, which is low density and residential, and contributes to a sense of visual enclosure and intimacy within the view. The site is not visible in its existing form in this view owing to its low scale and distance from the viewpoint.

The verdure within the view confers an intimate and contemplative ambience. The buildings in the background are representative of the residential character of The Bayle; however, their presence limits the church's visibility toward the Harbour area. The only structure related to the Harbour visible from this viewpoint is the top floors of the Grand Burstin Hotel, seen just beyond the church's porch, but which is not readily discernible or recognisable.

Similarity with previous views assessments: None.

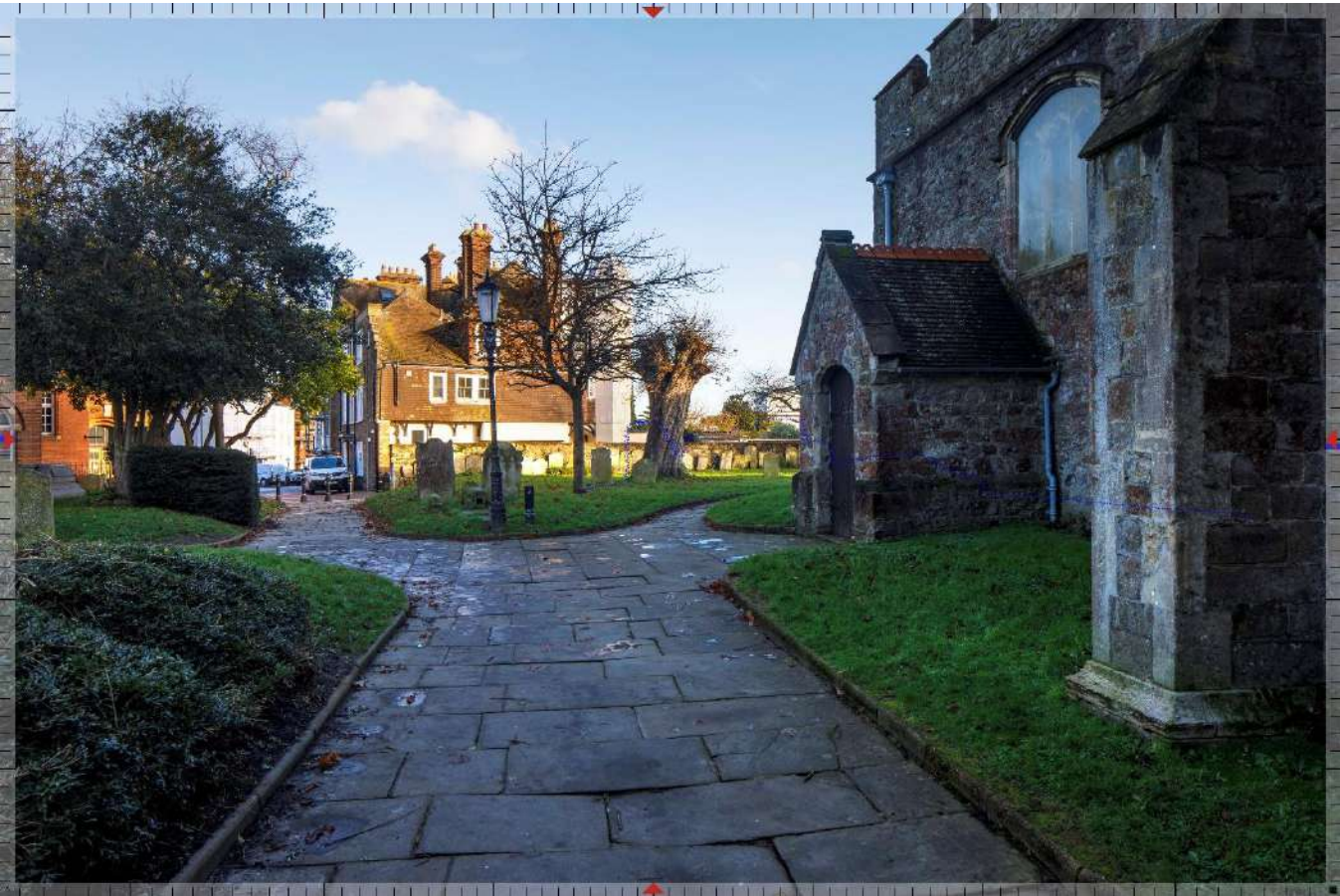
View 14 View from the churchyard of St Mary & St Eanswythe, The Bayle

Baseline (with consented outline)



The consented Masterplan will be barely visible from this location.

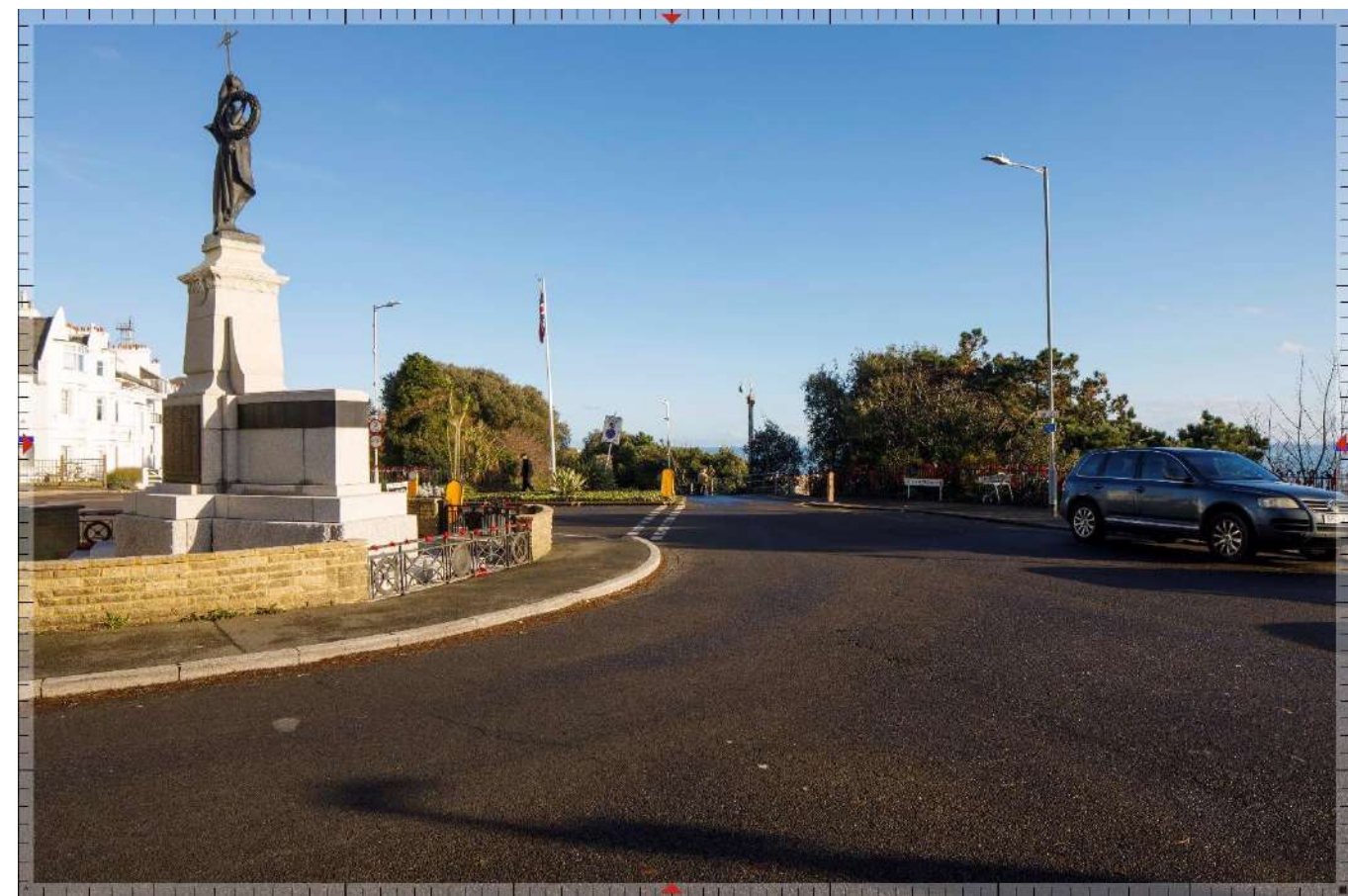
Proposed



The proposed development is completely screened by existing built form and verdure in this view and will not be visible. The development will therefore have **no effect** on this view.

View 15 View from the Folkestone War Memorial

Existing



This viewpoint is captured at the roundabout near the War Memorial statue on the Road of Remembrance and will be experienced incidentally by both road-users and pedestrians walking between The Leas, the town centre, and the sea front. It is approximately 475 meters away from the western boundary of the Site.

The Grade-II* listed statue prominently occupies the left side of this view and provides the main focal point of the view. Located on the key road connecting the lower and upper sides of the Leas Cliff, this spot experiences heavy traffic and thus the view is activated by moving traffic, both on the road and pedestrian.

Despite being on the elevated, upper side of the cliff, the view toward the Channel is heavily screened by bosky verdure, albeit one will be aware of the water’s presence off to the south and the view opens up as one moves from this precise position. Additionally, this view offers a sense of openness, with only a limited number of buildings visible in the surroundings.

Similarity with previous views assessments: This viewpoint is similar to View 1 of the Masterplan Application (Y12/0897/SH); but slightly amended to respond to the development included within this RMA.

Visual Receptors sensitivity	Value of Heritage Assets	Townscape Character Area	Amenity value
Medium-High	High (The War Memorial)	View is taken from periphery of TCA 7	Medium

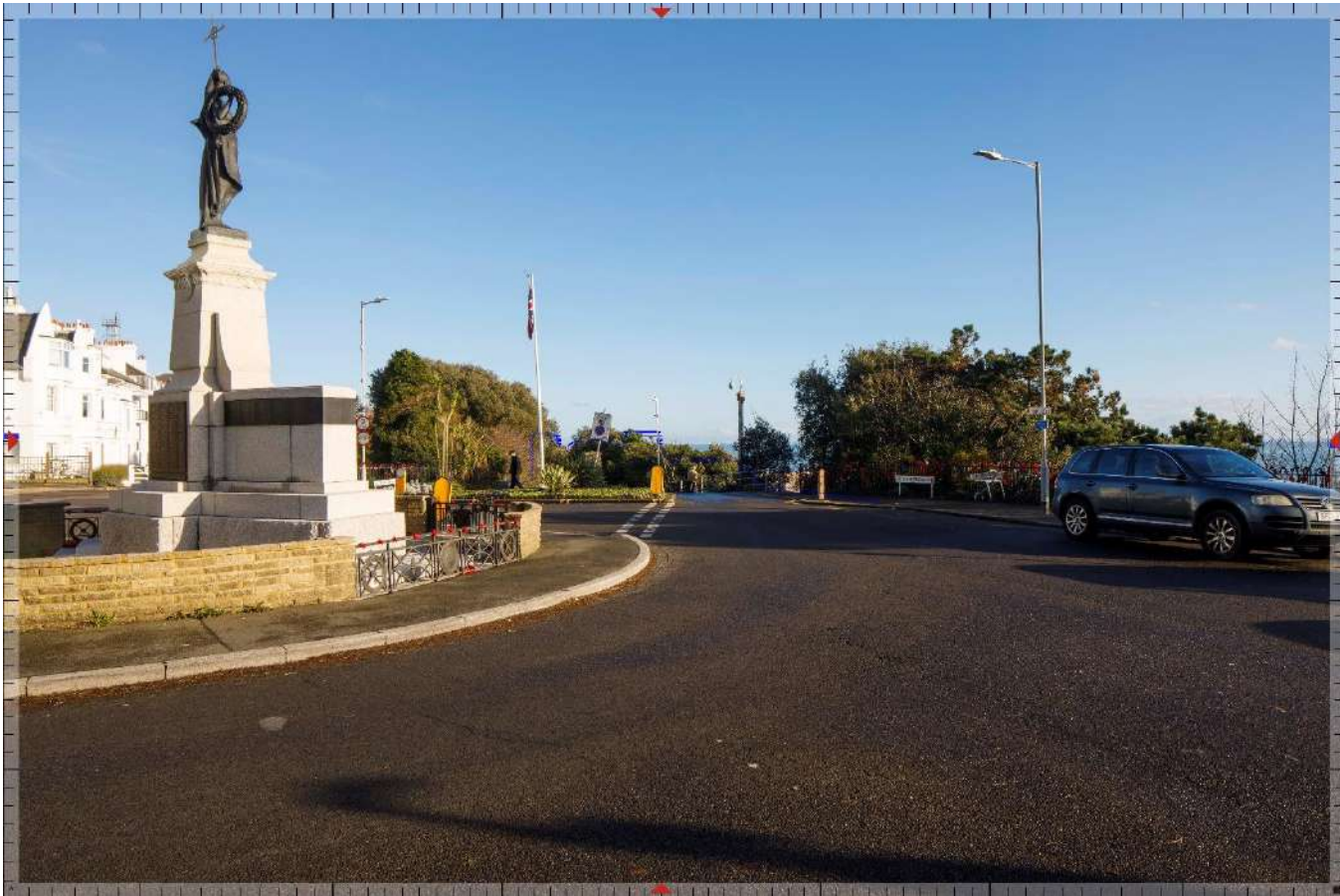
View 15 View from the Folkestone War Memorial

Baseline (with consented outline)



The consented Masterplan will largely be screened by the wild-grown vegetation. Only a minor top section of the massing will be perceivable from this location.

Proposed



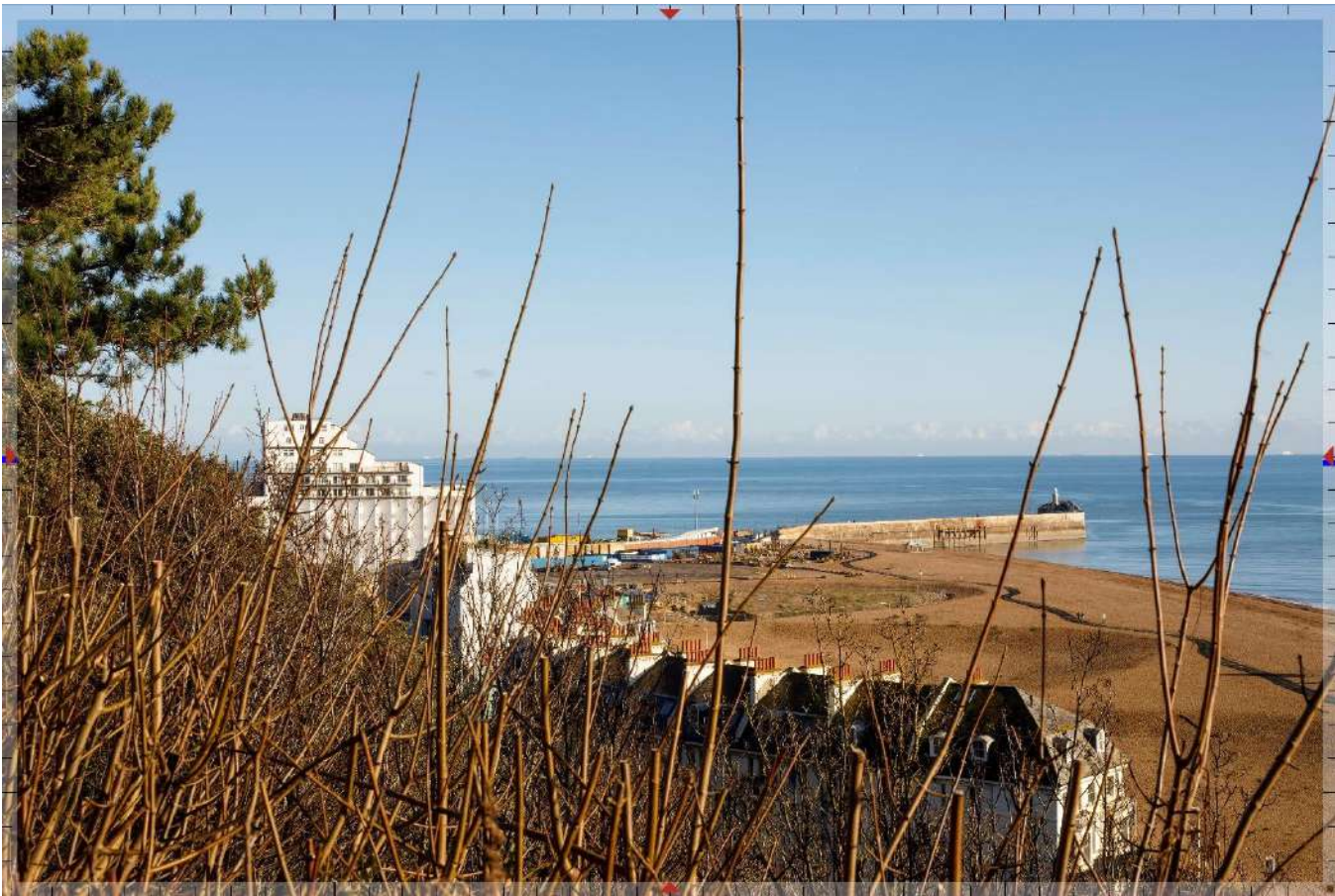
The proposals will be seen in the centre background of this incidental view. In summer months proposals are wholly screened by foliage; in winter, it may be glimpsed through the bare trees but will be a background element.

Due to the distance of the Harbour from the viewer, and the obscured nature of the view towards the development, the character and focus of the view remains unchanged, and the Grade II* memorial remains the focus in the foreground. The sense of openness is retained in this view, and the appreciation of the horizon is not diminished by the proposals.

Overall, the scale of the impact is assessed as being **minor**, and the nature of the impact **neutral**.

View 16 View east from the Step Short Memorial

Existing



This viewpoint is situated within the grounds of the Step Short Memorial atop Leas cliff. The view provides clear visibility toward the Channel, albeit partially screened by vegetation on the cliff hill. In summer months, when the vegetation is in full growth, the view will be obscured to a greater extent. It is approximately 500 meters away from the western boundary of the Site.

The most prominent features in this view include the Grade-II listed Crescent and the 1970 Grand Burstin Hotel, reflecting a mixed residential and commercial townscape. In the middle range of the view, the beach and walkway are clearly visible, as is their relationship to the sea, and there is an overall feeling of openness and the prominence of the natural landscape. Modern hard standing works have been initiated for future developments within the wider Masterplan area, particularly Plots C, D, & E of the Folkestone Harbour Plots, although these are not readily discernible at this distance. At the end of the beach, part of the Harbour and the Harbour Arm, including the Grade-II listed Lighthouse, are visible.

Similarity with previous views assessments: The viewpoint location is similar to viewpoint 2 submitted for the s.73 application (Y17/1099/SH) but has been adjusted slightly to respond to the development included within this RMA.

Visual Receptors sensitivity	Value of Heritage Assets	Townscape Character Area	Amenity value
Medium-High	Medium (Marine Crescent)	View is taken from periphery of TCA 7	High

View 16 View east from the Step Short Memorial**Baseline (with consented outline)**

The maximum parameters of the outline planning permission include buildings oriented along Marine Parade and building mass which fans towards the coast following the historic form of the Harbour. This built mass has a cascading form towards the beach.

Proposed

The proposed development will be seen in the middle ground in this incidental view, in the context of Marine Crescent (Grade II) and The Grand Burstin Hotel, as well as the Harbour arm and lighthouse (Grade II). The proposed development continues on the established building line and form of The Grand Burstin, and the Grade II listed terrace and is wholly located within the maximum parameters of the Outline Planning permission.

The sense of openness is preserved in this view, as the horizon line and natural landscape is largely maintained and continues to be appreciated. The massing of the proposed development (Plot F1, Building 1 and Building 4) has a gradation which slopes down towards the shore, mirroring the natural topography of the area. The materiality and detailed articulation of the new buildings would further enhance the layering of the Site and soften the massing of built forms. The overt and emphatic form of the crescent gives it a prominence and visual strength to retain its importance in the view.

As this photograph is taken in the winter, the proposed development will be screened to a greater extent in summer months due to the vegetation.

Overall, the scale of the impact is assessed as being **minor**, and the nature of the impact **neutral**.

View 16 (Looking eastward from the Step Short Memorial)**Proposed (cumulative)**

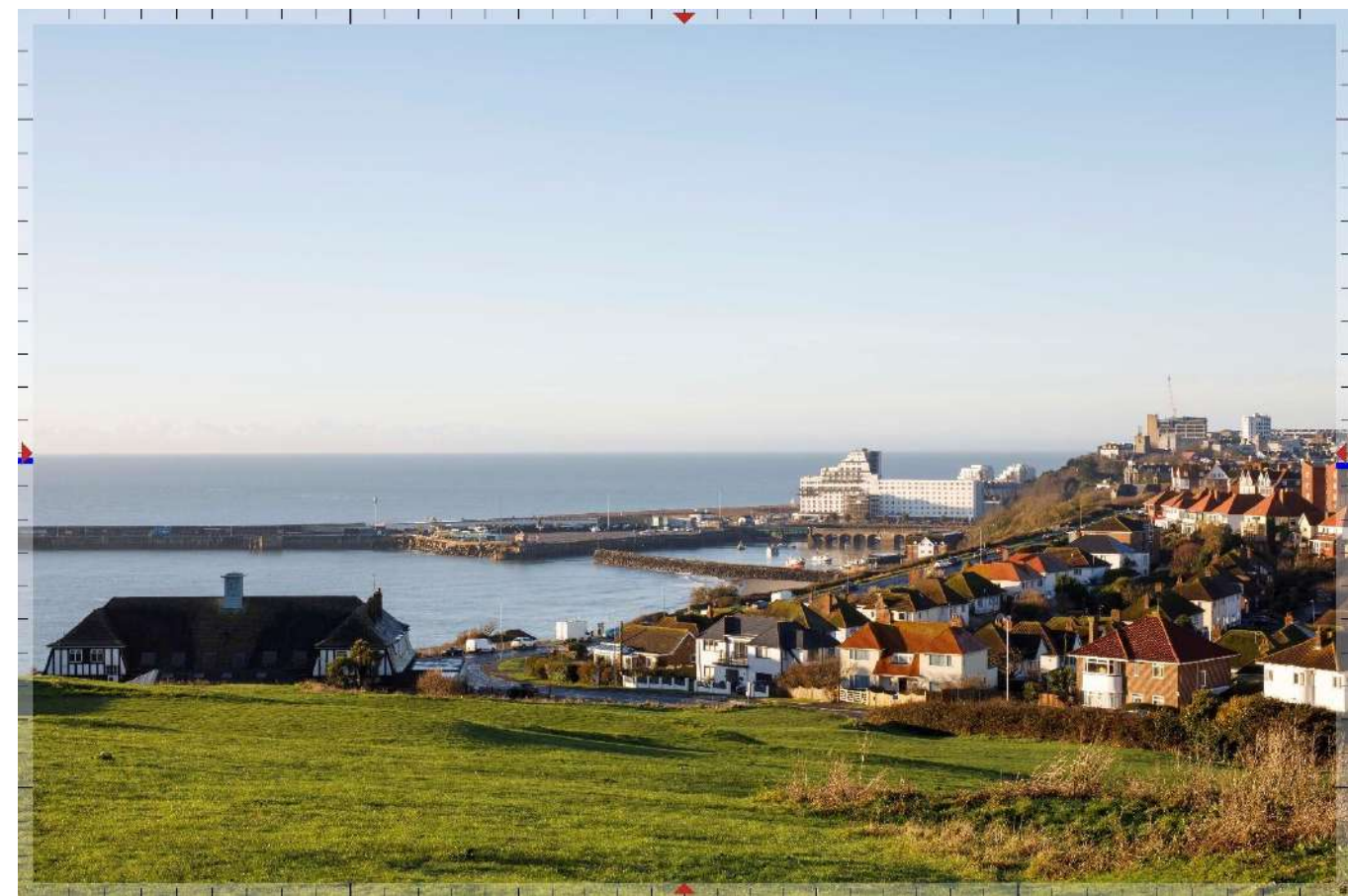
Developments as part of the Folkestone Masterplan (Plots B, C, D and E) will be seen in the foreground occupying the land between Marine Crescent and the Boardwalk. Part of the proposed Harbour development, notably Plot F will be screened from this view, due to the built form of Plot E.

The cumulative developments will impact the openness of this view, especially the relationship between the Harbour development, The Grand Burstin and Marine Crescent, by occupying the foreground.

Nevertheless, as the proposed development is sited within the maximum parameters of the Outline Planning permission. Overall, the scale of the impact in this cumulative view is assessed as being **minor**, and the nature of the impact **neutral**.

View 17 View from the Martello Tower

Existing



This viewpoint is captured from Martello Tower, a scheduled monument situated on the east cliff, offering an open view of the entire Harbour area. This location, approximately 500metres away from the north-eastern corner of the Site, is frequented by both visitors and local residents, serving as part of the walk between the Harbour and the east cliff.

This viewpoint serves as a focused viewing spot, providing a remarkable sense of openness towards the Harbour and the seafront. The steppe in the foreground reflects the natural composition of the east cliff, providing a sense of tranquillity and natural beauty. In the middle range of the view, Arts-and-Crafts style buildings are visible on different levels, a result of the elevated topography and contributing to the residential character of the view.

In the centre of the view lies Folkestone Harbour, encompassing the Grade-II listed East Pier arm, the Viaduct and Swing Bridge, which together are still visually understood as sharing an historical functional relationship. Beyond this, and prominent in the view, is the Grand Burstin Hotel; its bulky form provides a contrast to the finer grain residential development experienced within the view and indicates the commercialisation of the seafront.

Similarity with previous views assessments: The viewpoint location is similar to viewpoint 17 submitted for the Masterplan application (Y12/0897/SH).

Visual Receptors sensitivity	Value of Heritage Assets	Townscape Character Area	Amenity value
Medium-High	Medium (East Pier; Viaduct and Swing Bridge; Folkestone Leas & Bayle CA)	View is taken from TCA 3	High

View 17 View from the Martello Tower**Baseline (with consented outline)**

The design consented as part of the outline masterplan includes an almost unbroken and continuous wall of massing. The variation in height would be perceivable and appreciated from this viewpoint, with the tallest element facing the Channel and the other elements gradually stepping down towards the Grand Burstin Hotel.

Proposed

The proposed development is seen in the middle ground of this view and occupies the full extent of the main Harbour area. The height of the proposed development is within the maximum parameters established by the outline planning permission, and within the datum established by The Grand Burstin Hotel.

The sense of openness is retained in this view, despite the scale of development on the Harbour, and the distinction between historic Folkestone, the Harbour (with its contemporary development) and the landscape is maintained. The ability to appreciate the significance of the visible heritage assets such as the pier, Harbour arm, viaduct, and swing bridge, are preserved, albeit the proposed development provides a new focus in the view, creating a new sense of enclosure and definition to the harbour arm.

The horizon line is maintained from this viewpoint, although it should be noted that the proposals will begin to obscure the horizon if the viewer moves further down, reinforcing the dynamic nature of this view.

The rise of topography to the right is mirrored in the design, and undulation of building heights across the site, which step up toward the east (left) with a gradual step down towards The Grand Burstin and other developments (Plots A-E) of the masterplan. Within this view, the prominent buildings seen to the left-centre, with Buildings 6 and 9 have a landmark effect.

The proposals omit built form on Plot G2, consented to be a 11m high block facing the north of the site, and viewed obliquely in this view. The proposed development instead provides a landscaped open space and amphitheatre in

this area. This ensures an open foreground to the development when seen from this view, and a better appreciation of the grouping of (Plot G1) Buildings 1, 4 and 7 and is therefore an improvement over the maximum parameters of the scheme.

Overall, the scale of the impact is assessed as being **minor**, and the nature of the impact **neutral**.

View 17 View from the Martello Tower

Proposed (cumulative)

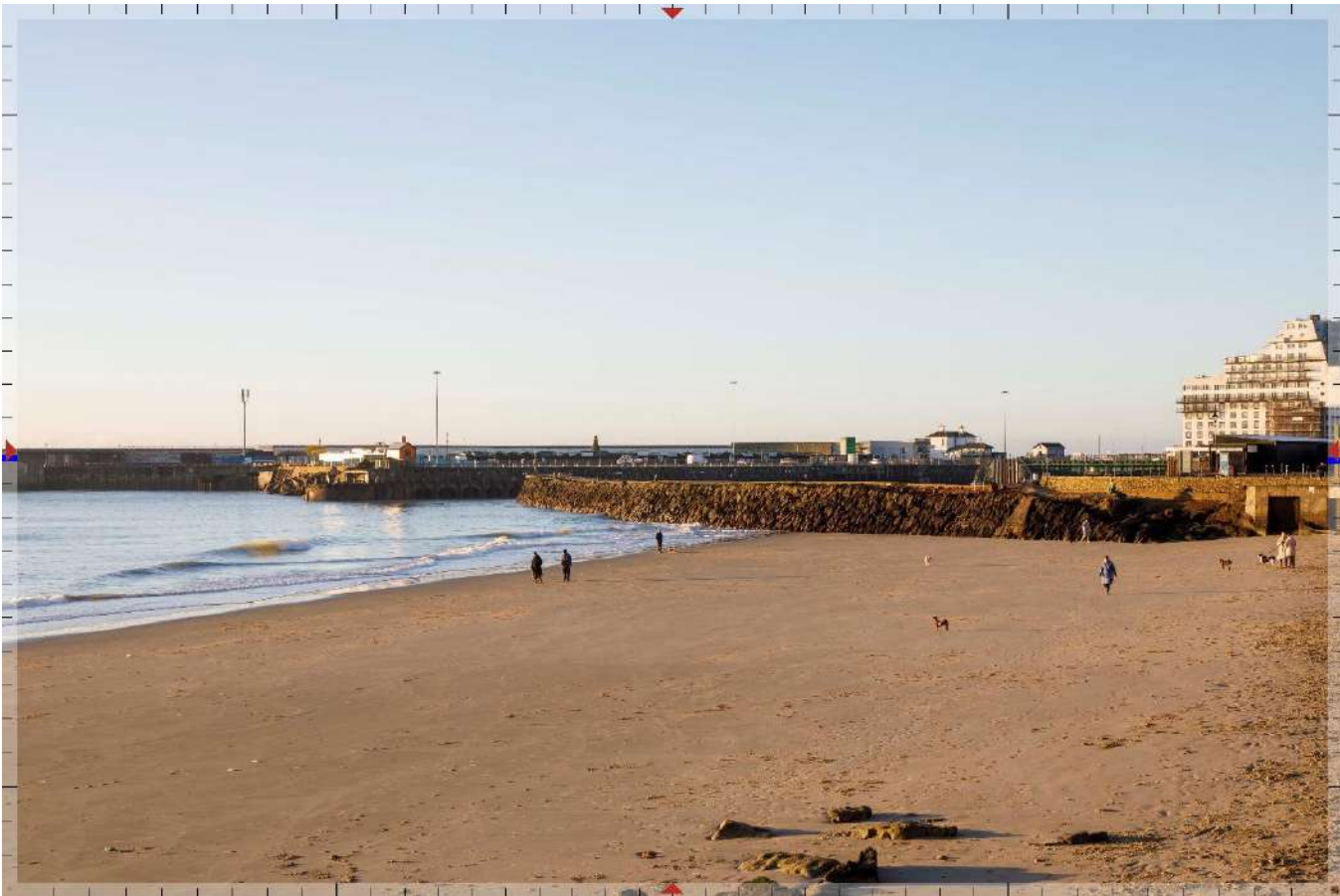


Cumulative developments will only fleetingly be seen in the background, between Plot F, H and The Grand Burstin and be largely screened from this view by the massing of The Grand Burstin hotel.

There is no additional impact on this view due to the Harbour plots being conjunctively seen alongside cumulative developments. Overall, the scale of the impact in this cumulative view is assessed as being **minor**, and the nature of the impact **neutral**.

View 18 View from the Folkestone Sand Beach

Existing

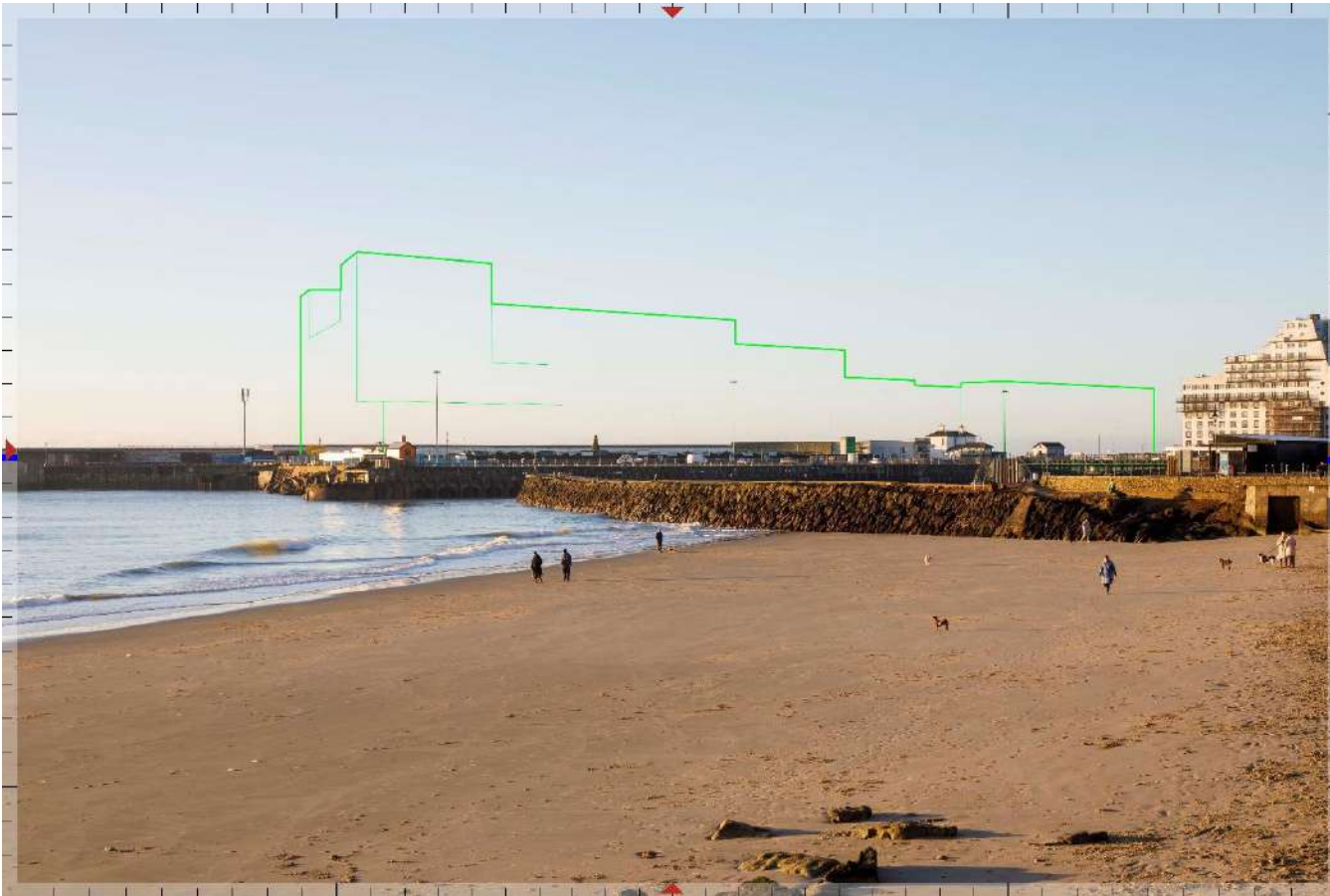


This viewpoint is situated on Folkestone Sand Beach and the Rescue Point, to the east of the Grade-II listed East Pier arm. It is located 300 metres away from the north-eastern corner of the subject Site. Frequented by residents, visitors and tourists, this view is particularly experienced during the summer season.

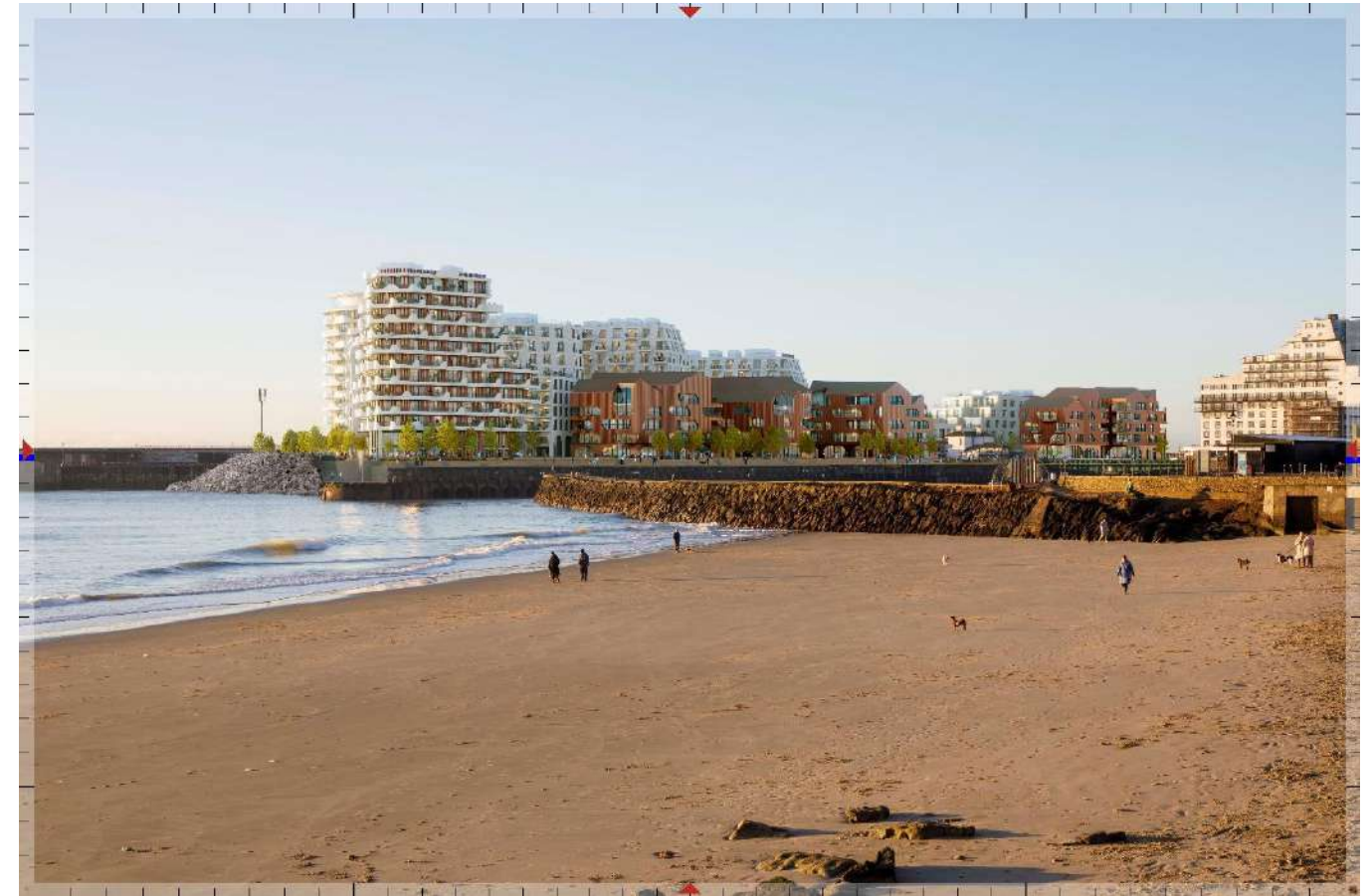
This view is characterised by the extensive seafront and sandy beach in the foreground, providing a sense of openness. The Grade-II listed East Pier arm encloses beach, representing the boundary of the Harbour. Beyond this lies the historic Harbour Station and the Grand Burstin Hotel, the latter of which projects above the skyline and draws the eye, creating a sense of imbalance in this view. While some historic structures from the Harbour Station are visible, they are not readily discernible and are not the focus of the view.

Similarity with previous views assessments: The viewpoint location is similar to viewpoint 18 submitted for the Masterplan application (Y12/0897/SH).

Visual Receptors sensitivity	Value of Heritage Assets	Townscape Character Area	Amenity value
Medium-High	Medium (East Pier; Viaduct and Swing Bridge)	View is taken from TCA 8	High

View 18 View from the Folkestone Sand Beach**Baseline (with consented outline)**

The design consented as part of the outline masterplan includes an almost unbroken and continuous wall of massing. The variation in height would be perceivable and appreciated from this viewpoint, with the tallest element facing the Channel and the other elements gradually stepping down towards the Grand Burstin Hotel.

Proposed

The proposed development would be seen in the middle-ground of the view, projecting up into the existing open skyline. It would occupy the full extent of the Harbour as seen in this view and is expressed as a bold contemporary architectural response and a new phase in the evolution of Folkestone.

As seen from this viewpoint, the proposals present a continuous building line which, owing to the orientation of the pedestrian streets through the Site and the angle of the view, does not express the permeability of the scheme. The massing of the proposed development is, nonetheless, broken down by the interesting roofscape and stepped skyline the buildings create. The layering of buildings, expressed by the distinctive form and materiality of the buildings in the foreground provides a sense of depth and helps to define the individual buildings within the Site.

Building 9 seen to the left provides a punctuation to this view, as the tallest and most prominent element of the design and provides a landmark feature to the development. There is a gradation down to the west (right) of the site, where the development meets other plots as part of the masterplan development. The scale of the development is also the lowest along the northern (town-facing) part of the site with Plot H (Buildings 1 and 2) and Plot G (Buildings 1, 4 and 7) reflecting a wharf like design, and a form and scale which is domestic in character.

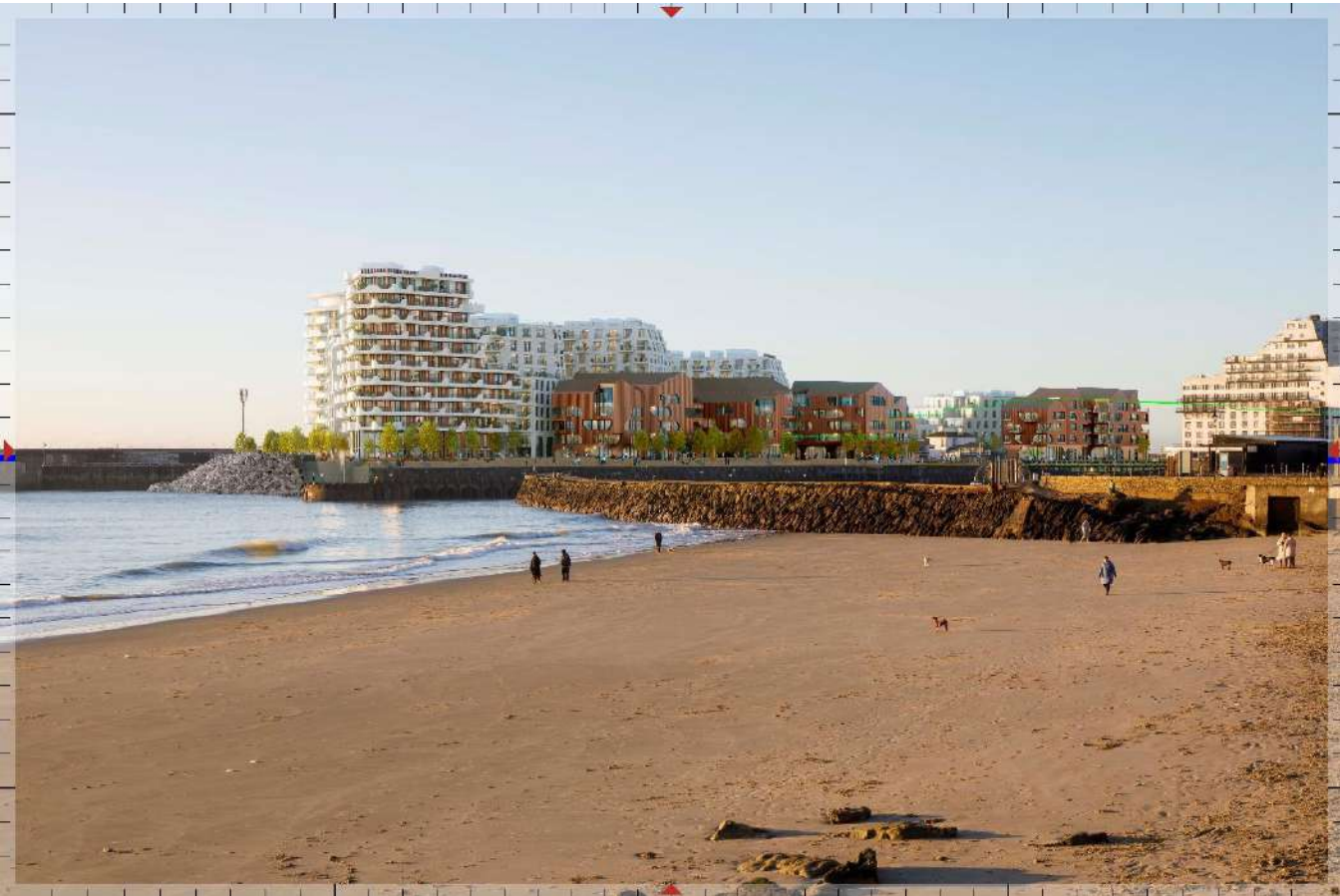
The landscape design and activation of the street frontages provides an important integration between the built form and the site, providing a sense of activation. This suggests a destination within the view and encourages pedestrian movement towards the site.

The proposals omit Plot G2, consented to be a 11m high block facing the north of the site, and instead provide a landscaped open space and amphitheatre in this area. This is an improvement over the maximum parameters of the scheme and ensures a more open foreground to the development when seen from this view.

Overall, the scale of the impact is assessed as being **minor**, and the nature of the impact **neutral**.

View 18 View from the Folkestone Sand Beach

Proposed (cumulative)



Cumulative developments will only fleetingly be seen in the background, between Plot F, H and The Grand Burstin and be largely screened from this view by the massing of The Grand Burstin hotel. However, the massing of Plot E will sit in the sky gap currently seen between Plot H, Building 1 and the existing hotel.

There is no additional impact on this view due to the Harbour plots being conjunctively seen alongside cumulative developments. Overall, the scale of the impact in this cumulative view is assessed as being **minor**, and the nature of the impact **neutral**.

View 19 View from the Foord Road Viaduct (Kinetic View)

Existing



This non-verified viewpoint reflects the experience of passengers on the train from Folkestone Central to Dover as they cross the Grade II listed Viaduct Bridge over Foord Road, which is approximately 960 metres away from the subject Site. The view is characterised by a built environment featuring a mix of modern developments and early 20th-century residential houses, with features of the historic townscape such as Grace Chapel and The Durlocks penetrating the skyline beyond. Folkestone 51 stands out as the most visually prominent element in the centre of the view, representing the town's 21st-century development with its modernised appearance and substantial massing. Apart from this, most of the buildings presented in this view are of low rise and are built along the hilly topography. In the further background, the sea is visible through a break in the building line.

Similarity with previous views assessments: None.

Visual Receptors sensitivity	Value of Heritage Assets	Townscape Character Area	Amenity value
Low	Low (Folkestone Leas & Bayle CA)	View outside TCA study area	Low-Medium

View 19 View from the Foord Road Viaduct (Kinetic View)

Baseline (with consented outline)



The design consented as part of the outline masterplan includes an almost unbroken and continuous wall of massing, which will surpass the height of the horizon line. However, only the taller sections of the scheme will be visible at the end of the view.

Proposed



The proposed development is seen as a background feature within this incidental view which is experienced in a fleeting and transient manner. The view provides a skyline appreciation of Folkestone, and a view of the roofline of key buildings within the townscape.

The form of the roofscape across the site is well articulated and key buildings of the development are differentiated, with gaps between individual structures breaking down the visual massing. Overall, the design creates an undulating skyline profile, mirroring the varied skyline of Folkestone as seen in this view.

Overall, the scale of the impact is assessed as being **minor**, and the nature of the impact **neutral**.

10.4 Summary (Views Impact Assessment)

Table 3: Summary of VIA											
View No	Description	Visual Receptors	Visual Receptor Sensitivity	Heritage Value in the view	Townscape character area	Amenity Value	AVR type	Impact of Proposed Development		Cumulative Impact	
								Scale of Impact	Nature of Impact	Scale of Impact	Nature of Impact
1	View east from Marine Parade	Vehicle users, pedestrians, cyclists	Medium	Low	TCA 7	Low-medium	AVR1	Minor	Neutral	Minor	Neutral
2	View east from Marine Crescent	Vehicle users, pedestrians, cyclists	Medium	Medium	TCA 7	Medium	AVR1	Minor	Neutral	Minor	Neutral
3	View northeast from the beach walk	Pedestrians and Beach users	Medium	Medium	TCA 8	Medium	AVR1	Minor	Adverse	Minor	Neutral
4	View north from the harbour arm	Pedestrians	Medium-high	Low	TCA 1	Medium-High	AVR3	Moderate	Neutral	No cumulative developments seen in this view	
5	View North from Harbour Arm	Pedestrians	Medium-High	Low	TCA 1	Medium-High	AVR2	Minor	Neutral	Minor	Neutral
6	View from The Stade	Pedestrians (primarily); vehicle users	Medium	Medium-High	TCA 1	Medium-High	AVR3	Minor	Neutral	Minor	Neutral
7	View south along the Viaduct	Pedestrians	High	Medium-High	TCA 2	High	AVR3	Minor	Neutral	No cumulative developments seen in this view	
8	View from the Harbour Fountains	Pedestrians	Medium	Medium	TCA 2	Medium	AVR2	Minor	Neutral	No cumulative developments seen in this view	
9	View south from the intersection of Harbour Approach Road and Harbour Street	Pedestrians	Medium	Medium	TCA 2	Low-Medium	AVR1	Minor	Neutral	Minor	Neutral
10	View south from the St Peter's School playground	Pedestrians	Medium-High	Low-medium	TCA 3	High	AVR3	Minor-moderate	Neutral	Minor	Neutral
11	View from Tontine Street	Pedestrians, Cyclists, Vehicle users	Medium-High	Low	TCA 5	Low	AVR1	Minor	Beneficial	No cumulative developments seen in this view	
12	View southeast from the Parade Steps	Pedestrians	Medium-High	Medium	TCA 6	High	AVR3	Minor	Neutral	Minor	Neutral
13	View from The Bayle	Pedestrians, Cyclists, vehicle users	Medium-High	Medium-High	TCA 6	Medium-High	AVR1	Minor	Neutral	No cumulative developments seen in this view	

14	View from the churchyard of St Mary & St Eanswythe, The Bayle	Pedestrians	Medium-High	High	TCA 6	High	AVR1	-	Non-effect	No cumulative developments seen in this view	
15	View from the Folkestone War Memorial	Pedestrians, Cyclists, vehicle users	Medium-High	High	TCA 7	Medium	AVR1	Minor	Neutral	No cumulative developments seen in this view	
16	View east from the Step Short Memorial	Pedestrians, Cyclists,	Medium-High	Medium	TCA 7	High	AVR3	Minor	Neutral	Minor	Neutral
17	View from the Martello Tower	Pedestrians	Medium-High	Medium	TCA 3	High	AVR2	Minor	Neutral	Minor	Neutral
18	View from the Folkestone Sand Beach	Pedestrians	Medium-High	Medium	TCA 8	High	AVR3	Minor	Neutral	Minor	Neutral
19	View from the Foord Road Viaduct (Kinetic View)	Train users	Low	Low	Outside TCA assessment area	Low-medium	AVR1	Minor	Neutral	No cumulative developments seen in this view	

REFERENCES

The following sources have been referenced and used to inform this report. Due to its name change all publications by English Heritage are referred to as Historic England.

1. Planning (Listed Buildings & Conservation Areas Act 1990.
2. Department of Communities and Local Government (2023). National Planning Policy Framework.
3. Department of Communities and Local Government (2019) Planning Practice Guide. Conserving and enhancing the historic environment
4. Historic England (2008). Conservation Principles. Policies and Guidance.
5. Historic England (2017). The setting of heritage assets.
6. Historic England (2016). Making Changes to Heritage Assets. Historic England Advice Note 2.
7. Historic England (2015). Historic Environment Good Practice Advice in Planning. Note 2: Decision-Taking in the Historic Environment.
8. Historic England (2019). Statements of Heritage Significance.

APPENDICES

Appendix I: Impact Assessment Methodology and Criteria

This section explains the methodologies employed for both assessment of the baseline conditions and the effects of the Proposed Development on heritage, townscape, and visual receptors. This assessment has been carried out using desk-based data gathering and fieldwork.

The Guidance for Landscape and Visual Impact Assessments ('GLVIA') IEMA/LI (GLVIA 3rd Edition 2013) states that the visual impact assessment guidance with specific respect to Heritage Assets, should be *"assessed through Heritage Impact Assessment (HIA), principally set out in 'Seeing the History in the View' (Historic England) although 'The Setting of Heritage Assets, 2nd Edition GPA3 is also relevant"*.

When published in 2015, *'The Setting of Heritage Assets'* ('HEAN3') superseded *'Seeing the History in the View'*. As such, using the latter document as the primary methodology for assessment would not be in accordance with up-to-date guidance. The methodology utilised in this document combines GLVIA principles with those set out in *'The Setting of Heritage Assets'* and incorporates other principles from Historic England HEANs and *'Conservation Principles, Policies and Guidance for the Sustainable Management of the Historic Environment'*, April 2008. This combined approach is followed due to the recognition of how there are other factors necessary to consider when assessing impact, as set out in HEAN 3 (page 1):

"Views, however, can of course be valued for reasons other than their contribution to heritage significance. They may, for example, be related to the appreciation of the wider landscape, where there may be little or no association with heritage assets. Landscape character and visual amenity are also related planning considerations."

The methods used in order to undertake the study were the following:

Desktop Research Review

Initial desktop studies were undertaken to establish the physical components of the Site and its surroundings and to identify built heritage assets, townscape character and potential visual receptors/viewpoint locations. Receptors were initially identified through a review of OS maps, aerial and street view photography, policy and guidance documents and online resources (including Historic England's National Heritage List Map and Folkestone's ArcGIS based Interactive Planning Map). Dates of elements and construction periods have been identified using documentary sources and visual evidence based upon experience gained from similar building types and construction sites.

The documentary research was based upon secondary sources of local history and architecture, including maps, drawings and reports. This HTVIA has also drawn on the research findings resulting from desktop research including online articles and resources.

Area Surveying

A survey of the surrounding areas has been conducted since 2012 by visual inspection to analyse the site and identify aspects of local area that have the potential to be most affected by the proposed works. A recent walkover survey was conducted in August 2023, and baseline photography for the

visual impact assessment was undertaken in December 2023, representing maximum visibility from the selected viewpoints.

The initial scoping exercise has been informed by Historic England's Map Search, on-site surveys and professional judgement.

The study area considers a radius of 500m from the subject Site. This study area is considered to be appropriate and proportionate to the proposals for the following reasons:

- There are large number of heritage assets in Folkestone, within the study zone.
- The study zone considers heritage assets in The Stade, The Durlocks, The Bayle and between The Bayle and The Leas, which are key neighbourhoods of Folkestone which relate to the setting of the harbour.
- The zone of visual influence on which the visual impact assessment of the original EIA application (2012) was based, covers these areas, and associated heritage assets. A similar zone has been considered for the current visual impact assessment, accompanying the reserved matters application.

Within the study area of 500m, all designated and non-designated heritage assets ('NDHAs') which have the potential to be affected by the Proposed Development have been identified. The identification of townscape and visual receptors and viewpoints have also been included within the study area (and beyond it where necessary in the case of viewpoints). Within an approximate 500m radius of the Site there are a number of built heritage assets.

Built Heritage Appraisal

The below assessment of significance of heritage assets informs the assessment in Table 1 (Section 4.6) of this report. Most heritage assets in Folkestone within the study area are Grade II listed, with a few buildings designated Grade II*.

The baseline conditions have been established through an initial desktop survey to identify the relevant heritage assets in proximity to the Site and included a search of Historic England's National Heritage List for England ('NHLE') to identify statutory listed buildings and scheduled monuments (Registered Parks and Gardens are not relevant in this case), and a review of Folkestone's online sources to identify conservation areas. Folkestone & Hythe District Council does not have a formal local list which identifies non-designated heritage assets however there are a number of Heritage Assets identified as 'Places of interest' within the interactive planning map. The heritage significance appraisal is presented at **Section 4.6** of this report.

Desktop surveys were supplemented by a site survey undertaken in August 2023 to enable a robust assessment of the heritage significance of the identified heritage assets, including any contribution of their settings. These surveys follow on a series of site surveys undertaken since 2012, when Heritage Architecture were first involved as Heritage Consultants for the Outline Planning permission scheme, which forms the basis of the Folkestone Masterplan. The survey also enabled a better understanding of the current relationship between the Site and the surrounding heritage assets and the likely potential effects of the Proposed Development on their settings and significance (value).

This understanding of heritage significance is framed by the policies outlined in this report. In line with Historic England's 2019 guidance, the significance of a designated heritage asset is determined by an analysis of the relevant aspects of the following:

- **Archaeological Interest:** There will be archaeological interest in a heritage asset if it holds, or potentially holds, evidence of past human activity worthy of expert investigation at some point.
- **Architectural and Artistic Interest:** These are interests in the design and general aesthetics of a place. They can arise from conscious design or fortuitously from the way the heritage asset has evolved. More specifically, architectural interest is an interest in the art or science of the design, construction, craftsmanship and decoration of buildings and structures of all types. Artistic interest is an interest in other human creative skills, like sculpture.
- **Historic Interest:** An interest in past lives and events (including pre-historic). Heritage assets can illustrate or be associated with them. Heritage assets with historic interest not only provide a material record of our nation's history but can also provide meaning for communities derived from their collective experience of a place and can symbolise wider values such as faith and cultural identity.

There is no one set of criteria provided in Historic England documentation which provides guidance for the different grading of heritage assets in significance assessments. One set of guidance which is widely adopted for assessing heritage impact is the guidance provided by the International Council on Sites and Monuments.

Table 4 The hierarchy and definition of heritage significance relevant to the redevelopment of the Site (tailored from ICOMOS & Historic England guidance)

Heritage status / hierarchy	Description.
Very High / Exceptional heritage significance <i>International architectural and historic interest and importance.</i>	This heritage grading relates to the fabric and setting of: • Scheduled Ancient Monuments, • Grade-I listed buildings, • Grade-I historic parks/gardens, • and battlefields, defined by statute, where the particular site is well represented in the impacted historic environment.
High heritage significance <i>National architectural and historic importance and interest.</i>	This heritage grading relates to the fabric and setting of: • Grade-II* and grade-II listed buildings, • Grade-II* and grade-II historic parks/gardens, • battlefields, as defined by statute, • Conservation Areas containing very Important buildings. where the particular site is well represented in the impacted historic environment.
Medium heritage significance	This heritage grading relates to the fabric and setting of: • Grade-II listed buildings (dependant on character), • Grade-II historic parks/gardens and battlefields,

<i>Regional architectural and historic importance and interest.</i>	- designated Conservation Areas, - Unscheduled archaeological sites and landscapes of potential national interest where the fabric and character of the site is well represented in the impacted historic environment.
Low heritage significance <i>Local architectural and historic heritage importance and interest.</i>	This heritage grading relates to the fabric and setting of: - Locally Listed Buildings (as formally identified by the Council and defined by an adopted Local Planning Policy), - Folkestone does not have a Local list of Heritage Assets, however buildings of local interest are titled as ‘Place of interest’. - Sites identified and recorded as being of heritage interest on the Historic Environment Record, which retain a definable heritage interest as a component of the historic environment. unrecorded buildings, structures, or designed landscape features, which demonstrably retain a degree of heritage value due to their: architectural design, historic, communal, or townscape interest.
Negligible heritage significance <i>Buildings or fabric components which have been extensively altered, eroding or compromising their architectural and historic interest</i>	This heritage grading relates to sites which may be: recorded on the Historic Environment Record in record form or as ‘Find Sites’ but retain minimal or no original fabric or definable character. buildings, structures, or designed landscape features, which detract from the architectural design, historic, communal, or townscape interest of the principal heritage asset.
Unknown heritage potential <i>Buildings/sites where the potential importance interest requires determination</i>	This heritage grading relates to sites which may be locally identified as meriting recognition but have not been previously recorded or investigated so that their origins and fabric significance have yet to be objectively defined.

(‘ICOMOS’) in Appendix 3A of, ‘*Guidance on Heritage Impact Assessments for Cultural World Heritage Properties*’.

The focus is on providing necessary and proportionate amount of information based on the perceived level of heritage significance (refer to [redacted] for full definitions of heritage significance as defined in this present report).

Once the heritage significance of the built heritage asset (receptor) has been assessed, including any contribution of its setting, the likely potential impact of the Proposed Development upon its heritage significance is then assessed. Potential impacts are defined as a change resulting from the Proposed Development that affects the heritage asset, including its setting.

There is no standard methodology for the appraisal of physical (or ‘direct’) or visual (or ‘indirect’) impact on listed buildings, therefore, the method used below is a synthesis of the Historic England’s

guidance on ‘*Conservation Principles*’ (2008) and the policy requirements of the NPPF (2023), which requires that new development should be demonstrably ‘sustainable’, thus securing the protection or enhancement of the historic environment.

Assessing the Magnitude of Change or Impact

The magnitude of change or impact is assessed based upon a detailed understanding of how and to what extent the Proposed Development might impact the heritage asset.

The contribution of the setting to the value of the heritage asset is an integral component which also contributes to the overall value or significance of the asset. Which in turn, allows for the magnitude of direct and / or indirect heritage impact to be determined.

The impact of the Proposed Development upon the heritage asset’s heritage significance may be described as **beneficial**, **adverse**, or **neutral**. If the Proposed Development will enhance heritage values or the ability to appreciate them, as expressed in the first stage of the assessment (‘Significance Assessment’), then the impact on heritage significance will be deemed to be beneficial; however, if they fail to sustain heritage values or impair their appreciation then the impact will be deemed to be adverse. A neutral impact is identified where it is considered that the proposal will not change or impact an appreciation of the heritage asset’s significance. The scale of the overall impact of the proposed works on the significance of the building fabric is evaluated using the criteria in below.

This impact of the proposals on heritage assets has been based on the understanding of their significance and setting, the nature of the proposals themselves, as well as the understanding gained from the Visual Impact Assessment (**Section 10**). The respective impacts on each heritage asset can be found in **Section 8**).

Table 5: Criteria for defining the effect and degree of direct and indirect heritage impact

Definition of magnitude and nature of heritage impact.	Direct heritage impacts	Indirect heritage impact
Major adverse Impact. <i>Substantial harm of this nature, which results in total loss of significance or fundamentally affects the significance of defined heritage assets, should normally be avoided.</i>	Development resulting in demolition of a significant historic fabric component which results in total loss of significance, or fundamental compromises the setting of a designated heritage asset.	Substantially harmful change to the fabric and character of a designated heritage asset, or the setting of the identified designated heritage assets. Where the development severely erodes the heritage interest of the identified heritage assets in the view, or the ability to understand and appreciate its architectural and historic interest and thus results in total loss of significance.
Moderate Adverse Impact. <i>Less-than-substantial harm will need to be demonstrably mitigated and justified by clear public benefits.</i>	Development resulting in extensive harmful alterations (but not total demolition) of a designated heritage asset or its setting.	Less than substantial harm to the fabric and character of a designated heritage asset, or the setting of the identified designated heritage assets. Where the development erodes to a clearly discernible extent the heritage interest of the heritage assets in the

		view, or the ability to appreciate its heritage interest.
Minor Adverse Impact. <i>The negative impact on the setting or overall character will need to be clearly balanced by appropriate mitigation.</i>	Development resulting in alterations to a designated heritage asset which result in minor compromise of its fabric or erosion of its character.	Minor compromise to the fabric and character of a designated heritage asset, or the setting of the identified designated heritage assets. Where the development erodes to a minor extent the heritage interest of the heritage asset and its setting, such that it is noticeably changed.
Negligible adverse impact. <i>This does not mean that there will be no physical or visual change, rather that the resultant difference would not diminish the value of the heritage assets' significant physical fabric, their settings or significance to any appreciable degree.</i>	Development resulting in negligible direct impact on a designated heritage asset which results in the removal of a minor, original fabric component, but avoids diminishing its character and its special architectural or historic interest.	Negligible perceptible change to the character of a designated heritage asset, or the experience and understanding of its special interest. The degree of change would alter, but not diminish, the intrinsic heritage interest of the identified heritage assets, or the experience and appreciation of the buildings or the designated area to any appreciable degree.
Neutral Impact. <i>This does not necessarily mean that there will be no physical or visual change, rather that the resultant difference will be imperceptible or appropriately balanced.</i>	Development which comprises an imperceptible physical impact resulting in no apparent change or achieved by removing a component of no heritage value which detracts from the special interest of the building fabric.	Imperceptible change to the fabric and character of a designated heritage asset, or the setting of the identified designated heritage assets. A neutral impact occurs when the development does not affect the architectural, aesthetic, and historic interest of the heritage assets in the view, or the ability to appreciate its significance to any measurable degree.
Negligible beneficial impact. <i>The resultant difference will be imperceptible but have a positive impact on the understanding or appreciation of the heritage asset.</i>	Development resulting in a negligible beneficial direct impact on a designated heritage asset which results in the removal of a minor non-original fabric component which detracts from the character and its special architectural or historic interest.	Negligible perceptible change to the character of a designated heritage asset, or the experience and understanding of its special interest. The degree of change would imperceptibly enhance the intrinsic architectural and historic of the identified heritage assets, or the experience and appreciation of the buildings or the designated area.
Minor Beneficial Impact. <i>The proposed change would result in a demonstrable improvement to the overall character or setting of a heritage asset.</i>	Development resulting in alterations to a built heritage asset which deliver a minor beneficial physical impact or enhancement of the site's special interest.	Minor enhancement to the fabric and character of a designated heritage asset, or the setting of the identified designated heritage assets. Where the development enhances to a minor extent the architectural and historic interest of the heritage assets

		in the view, or the ability to appreciate its significance.
Moderate Beneficial Impact. <i>The proposed change would result in a considerable improvement to the overall character and appreciation of a heritage asset with clear beneficial enhancement of its heritage interest.</i>	Development resulting in alterations to a built heritage asset resulting in moderate beneficial physical impact, or an enhancement of the site's character.	Evident improvement of the fabric and character of a designated heritage asset (or the setting of the identified designated heritage assets) resulting in an enhancement of its cultural heritage interest. Moderate enhancement to the setting of the built heritage asset. Where the development will enhance to a clearly discernible extent the heritage interest of the heritage assets in the view, or the ability to appreciate its significance.
Major beneficial Impact. <i>The proposed change would result in substantial improvement to the overall character and appreciation of a heritage asset, revealing and/or enhancing important characteristics of its heritage interest.</i>	Development resulting in restoration or alterations to a designated heritage asset which comprises substantial restoration of its fabric and historic character and an enhancement of its cultural heritage interest.	Substantial improvement of the fabric and character of a designated heritage asset (or the setting of the identified designated heritage assets) resulting in a significant enhancement of its cultural heritage interest. Substantial restoration or enhancement of the setting of the built heritage asset where the development will enhance to a fundamental extent the heritage interest of the heritage assets in the view, or the ability to appreciate its significance.

Appendix II: Townscape Assessment Methodology

The Landscape Institute Guidance

The methodology for assessing townscape, landscape and visual effects is broadly based on the principles set out in the third (2013) edition of ‘Guidelines for Landscape and Visual Impact Assessment’ (‘GLVIA3’), produced jointly by the Landscape Institute and the Institute of Environmental Management and Assessment. These principles are designed to assess natural landscapes however they can be applied to the assessment of urban townscapes and this approach is followed in this HTVIA.

The GLVIA3 states that assessment work needs to respond to the particular context in which it takes place. It expresses townscape as being:

“...areas where the built environment is dominant... townscape means the landscape within the built-up area, including the buildings, the relationships between them, the different types of urban open spaces, including green spaces, and the relationship between buildings and open spaces.” (Para. 2.7).

As such, the term ‘landscape’ in the GLVIA3 guidance can be justifiably used to apply to urban areas, and the term ‘townscape’ shall be used instead of ‘landscape’ in this assessment.

The two components of TVIA are:

1. Assessment of townscape effects: assessing effects on the townscape as a resource in its own right; and
2. Assessment of visual effects: assessing effects on specific views and on the general visual amenity experienced by people.

Whilst the assessment has been informed by a series of criteria which is set out in the tables that follow, it is important to note that these criteria are intended as a guide to inform professional judgement.

Townscape Character Appraisal

An appraisal has been made of the Site and its surroundings in their existing state in Section 5. This analyses the physical features and characteristics of the townscape and considers the current status of the Site. The objective of identifying the existing context is to provide an understanding of the townscape in the area that may be affected by the Proposed Development – with principal focus around its constituent elements, overall character, condition, how it is experienced, the value attached to it and its sensitivity. This process is referred to as ‘townscape character appraisal’.

Townscape character is assessed through the identification of a number of geographical areas which have readily identifiable characteristics in common. The physical characteristics of townscape may include: topography; patterns of land use and open space; development patterns and scale, including architectural styles and periods, density, massing, building types and materials; heritage assets including listed buildings, conservation areas and registered parks and gardens; vegetation patterns, including types of green space and their relationship to build form; permeability and linkages; public realm; and transport routes, including roads, railways, footpaths and waterways.

Consideration of these townscape elements were used to identify Townscape Character Areas (TCAs), defined as areas with broadly homogenous characteristics. The TCAs are based upon a combination of desk-based research, studying historic maps, OS maps and aerial images. This desktop analysis was supplemented by site visits undertaken by Heritage Architecture Ltd in June 2023 to finalise an appraisal of the existing townscape character. The study area of 500m for the baseline townscape character appraisal was determined by the immediate visual envelope of the Site and where the Proposed Development was considered to potentially influence local townscape character and local views.

The TCAs have been mapped with boundaries and their key characteristics described within the baseline appraisal (Section 5 of this report).

The GLVIA3 uses the term ‘receptor’ to mean both elements of the physical townscape, and people who will see the development. ‘Viewers’ are taken to be the general public affected by development, considering the differing interests and expectations likely to be found in residents, visitors or people who work in a place. The assessment recognises that people are generally more sensitive to change in the area where they live than elsewhere; and that they are generally more sensitive to change which affects recreational environments such as parks and open spaces rather than streets, whether designated or non-designated.

The TCA assessment includes identifying the value of each area. The consideration of value is initially based on, and takes into account, whether it is covered by a townscape designation at a national, regional or local level. This is also informed by designated heritage assets. An assessment of the value of each townscape character area is informed by the criteria set out in .

Table 6: Value of townscape character

Value	Description
High	Sites, features or areas of national importance with settings of high quality such as World Heritage Sites, AONB, National Parks, Grade I and Grade II* Listed Buildings and Registered Parks and Gardens. A high value townscape comprises well-designed/well-proportioned buildings with a strong sense of place. Buildings relate well to streets, spaces and landscape elements. Few detracting elements.
Medium	Sites, features or areas of local or regional importance with intact character such as Grade II* and Grade II listed buildings, Registered Parks and Gardens, Conservation Areas, Scheduled Monuments, local nature sites and long-distance recreational route. Tree Preservation Orders (TPO) and local designations that exhibit wider geographic, cultural or townscape significance. A medium value may equate to locally valued townscape, conservation areas that contribute significantly to its historic character, some listed buildings or locally listed buildings which are well represented in the townscape.
Low	Areas or features of local importance such as Tree Preservation Orders (TPO), Public Rights of Way (PROW) and locally listed buildings. A low value townscape character

	may include some positive features and buildings worthy of conservation at a local level. Lacking a sense of place and identity with detracting features. Possibly including some areas that are identified for improvement.
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The TCA appraisal also considers each area’s susceptibility to change. (). The less likely that the townscape receptor can accommodate the Proposed Development without undue consequences to the baseline condition, the higher its susceptibility to change.

The value and susceptibility to change is then combined to judge the sensitivity of each TCA, which is defined as High, Medium, or Low for each TCA. The assessment of sensitivity takes into account the heritage assets and their settings, including listed buildings, conservation areas, world heritage sites, scheduled ancient monuments, registered parks and gardens, non-designated heritage assets, locally listed buildings and townscape landmarks.

The assessment of the sensitivity of the receptor under consideration may be moderated to take into account a judgement about its quality, relative importance and significance. For example: a World Heritage Site or a listed building may have a good or a poor setting, and a good quality setting is more sensitive to change than a poor-quality setting. Similarly, a listed building or a part of a conservation area may be a prominent aspect of a view, or it may be present in the view but only incidentally. Conservation areas include within them areas of greater and lesser quality; and so on. Thus, there is not necessarily a direct link between the different categories of heritage assets and their relative importance, and the assessment of sensitivity as high, medium, or low.

outlines the general criteria to inform judgements on townscape sensitivity:

Table 7: Susceptibility of townscape character	
Susceptibility	Description
High	Townscape with distinctive components and characteristics, often including designated townscapes and/or important designated heritage assets; susceptible to small changes of the type of development proposed.
Medium	Townscape with local value, of relatively common components and characteristics and may include heritage assets such as conservation areas and locally listed buildings; reasonably tolerant of changes of the type of development proposed.
Low	Townscape of limited value and relatively inconsequential components and characteristics, including few or no designated and/or non-designated heritage assets; the nature of which is potentially tolerant of substantial change of the type proposed.

The magnitude of a townscape effect is assessed in terms of its size or scale, the geographical extent of the area influenced by that effect, its duration and degree of reversibility and the impact these are likely to have on the baseline character of the townscape element. Impact of the Proposed Development upon the townscape character may be described as beneficial, neutral or adverse.

The magnitude of change in the townscape takes into consideration the following factors:

- The extent/proportion of townscape elements lost or added;
- The of that element to townscape character and the degree to which aesthetic/perceptual aspects are altered; and
- Whether the effect is likely to change the key characteristics of the townscape, which are critical to its distinctive character.

The criteria used to assess magnitude of townscape effects are described in , below.

Table 8: Magnitude of townscape impact	
Category	Criteria
Major adverse townscape impact	The proposals will result in a total change in the key characteristics of townscape character; will introduce elements totally uncharacteristic to the attributes of the receiving townscape; and/or will result in a substantial or total loss, alteration or addition of key elements/features/characteristics.
Moderate adverse townscape impact	The proposals will result in a partial change in the key characteristics of townscape character; will introduce elements partially uncharacteristic to the attributes of the receiving townscape; and/or will result in partial loss, alteration or addition of key elements/features/characteristics.
Minor adverse townscape impact	The proposals will result in a small change in the key characteristics of townscape character; will introduce elements that are not uncharacteristic to the attributes of the receiving townscape; and/or will result in a minor loss, alteration or addition of elements/features/characteristics.
Negligible townscape impact	The proposals will result in a just discernible change to townscape character/elements/features/characteristics.
No change	The proposals will not result in any change to townscape character/elements/features/characteristics, Resulting in a neutral effect.
Minor beneficial townscape impact	The proposals will achieve a degree of fit with the townscape character/elements/features/characteristics and go some way towards improving the condition or character of the townscape.
Moderate beneficial townscape impact	The proposals will achieve a good fit with the townscape character/elements/features/characteristics, or would noticeably improve the condition or character of the townscape
Major beneficial townscape impact	The proposals will totally accord with the townscape character/elements/features/characteristics, or would restore, recreate or permanently benefit the condition or character of the townscape

Appendix III: Visual Impact Assessment Methodology

The Visual Impact Assessment ('VIA', **Section 10**) considers how views will change as a result of the Proposed Development and how this will affect people and the visual amenity of different locations. This assessment is limited to publicly accessible viewpoints and does not comprise a residential amenity assessment, which considers private viewpoints from residential properties (refer to GLVIA3, paragraph 6.17)

It is acknowledged that the proposals may be visible from locations beyond those that have been selected, however, it is considered that the selected representative viewpoints cover an appropriately broad area of visibility and will provide the most significant views as well as an idea of the likely potential impact of the Proposed Development beyond these locations.

Receptor Sensitivity

The term 'receptor' means both elements of the physical townscape, and people whose views and experience may be impacted by the Proposed Development. In the case of townscape assessment, the latter are taken to be the general public affected by a development, taking into account the differing interests and expectations likely to be found in residents, visitors and those who work in a place. For example, people who walk in a park in their leisure time are likely to have a higher sensitivity than people at their place of work.

Visual receptors relate to people but are defined according to use e.g. residential, business, road, footpath etc, rather than townscape features. The GLVIA3 defines the following visual receptors as being likely to be the most susceptible to change: residents; people engaged in outdoor recreation including users of public rights of way or whose attention is likely to be focused on particular views; and visitors to heritage assets or key attractions, particularly where views of the surroundings are important to the experience.

The sensitivity of the receptor (townscape character area, heritage asset, or view) as existing is assessed as **high, medium or low**.

The sensitivity of a receptor is dependent on:

- the importance of the receptor;
- the value and quality of the receptor; and
- the nature and expectation of the viewer.

The importance of the viewpoint is determined by any recognition that the viewpoint may have and by its amenity value. In terms of views, recognition includes viewpoints visited by large numbers of people, or view that are identified as being important to preserve by the Local Planning Authority through the statutory development plan. In terms of townscape receptors, recognition includes heritage designations and key townscape features. Locations such as parks and riverside walkways which are used for leisure purposes, as well as residential areas, are considered to be more sensitive in visual terms than everyday streetscapes with no heritage designations.

The value and quality of the receptor is a reflection of its visual interest, its character and coherence and any attractive or notable pictorial or compositional qualities. The value of a view or townscape character area is likely to be higher if it overlooks a designated area such as a conservation area.

The assessment of sensitivity takes into account the following heritage assets and their settings, in decreasing order of importance (but this is only a general guide - see comment at paragraph 3.4.xiv on moderation):

- World Heritage Sites, Grade I Listed Buildings, Scheduled Ancient Monuments;
- Grade II* or Grade II Listed Buildings, conservation areas and registered parks and gardens; and
- Locally listed buildings.

The baseline visual assessment considers the value of each view. This is informed by the criteria in

Table 9: Value of a view	
Value	Description
High	Statutory development plan identified views and/or views of national or regional importance, or particular local importance. The view is likely to be a nationally or regionally important view (e.g. views in the LVMF, a view identified in a World Heritage Site management plan or designed views within Grade I or II* historic parks or gardens) and/or contain heritage assets such as World Heritage Sites, Grade I or II* listed buildings, scheduled monuments, Grade I or II* historic parks or gardens or historic battlefields whose heritage significance is well represented in the view and which benefit from being seen in combination with each other. The view is associated with a designated heritage asset of a high Grade whose settings has not been compromised, or across high quality/valued townscape. The view might be referred to in several guidebooks or on tourist maps and/or referenced in art/literature.
Medium	Supplementary planning documents identified views including conservation area appraisals, and/or views of regional or local importance. The view is likely to be of importance at the county, borough or district level (e.g. Metropolitan Views defined by London boroughs or designed views within Grade II historic parks or gardens) and/or contain heritage assets such as Grade II listed buildings, Grade II historic parks or gardens, conservation areas, locally listed buildings or other locally identified heritage resources whose heritage significance is well

	represented in the view and which benefit from being seen in combination with each other. It may also be a view that contains heritage assets such as World Heritage Sites, Grade I or II* listed buildings, scheduled monuments, Grade I or II* historic parks or gardens, or historic battlefields whose heritage significance is clearly readable, but not best represented, in this particular view. Views of relatively common elements of townscape, likely to be of local visual amenity importance. It may comprise public rights of way through townscapes of moderate value or settings of heritage assets that have already been compromised.
Low	The view is not associated with designated heritage assets or important townscape. It might be across ordinary or poor-quality townscape with detracting or common elements. The view is unlikely to be referred to in guidebooks or on tourist maps and/or referenced in art and literature. It is likely to be of little visual amenity importance. The view may be a locally valued view and contain heritage assets whose heritage significance is clearly readable, but not best represented, in this particular view.

The assessment also considers each view's susceptibility to change which is assessed as being **high**, **medium** or **low**. The less likely that the townscape or landscape receptor can accommodate the Proposed Development without undue consequences to the baseline condition, the higher its susceptibility to change. The **susceptibility to change** within a view is judged by taking account of the occupation or activity of the people experiencing the view and the extent to which their attention or interest is focused on the view; this is assessed as being **high**, **medium** or **low**.

The higher the importance of the visual receptor and the more open the view of the Proposed Development is, the higher its susceptibility to change. The criteria for the susceptibility of change is presented in , below.

Table 10: Sensitivity of view/visual receptors

Sensitivity	Description
High	Specific interest or appreciation of the view, including residents, people engaged in outdoor recreation or using public rights of way, whose attention is focused on the townscape/view; and/or a view of national value (e.g. designated/protected views or important views within conservation areas).
Medium	General interest or appreciation of the view, including people engaged in outdoor recreation that does not focus on an appreciation of the townscape; and/or a view of local or limited value of (e.g. suburban residential areas or areas outside of conservation areas). A medium ability to accommodate the specific proposed change.

Low	Interest, appreciation or period of exposure to the view is limited, including people at work or motorists travelling through the area; and/or a view of limited value (e.g. industrial areas or derelict land). A high ability to accommodate the specific proposed change.
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The value and susceptibility to change is then combined to judge the sensitivity of each view. The assessment of sensitivity takes into account the heritage assets and their settings, including listed buildings, conservation areas, world heritage sites, scheduled ancient monuments, registered parks and gardens, NDHAs, locally listed buildings and townscape or landscape landmarks.

The magnitude of impact assesses the impact the Proposed Development will have on a view.

outlines the criteria against which an assessment of the magnitude of effect in each view has been informed. This incorporates magnitude of effect on the view including the townscape character and any heritage assets. Impact has been determined through a consideration of the size, scale and intensity of the proposed change, the geographical extent of the area influenced, the type of development and the level of integration of new features with existing elements.

Table 11: Magnitude of Visual Impact

Magnitude of Impact	Description
High beneficial	The development considerably enhances the heritage assets in the view, or the view as a whole, or the ability to appreciate those values. The Proposed Development responds very well to the scale, landform and existing pattern of the townscape or landscape and will result in considerable enhancements. The Development would create a significant improvement in views.
Medium beneficial	The development enhances to a clearly discernible extent the heritage values of the heritage assets in the view, or the view as a whole, or the ability to appreciate those values. The Proposed Development is characteristic of the scale, landform and existing pattern of the townscape, and maintains and/or enhances the existing quality or characteristic features. The Proposed Development would create a noticeable and improved change to the existing view.
Low beneficial	The development enhances to a minor extent the heritage values of the heritage assets in the view, or the view as a whole, or the ability to appreciate those values. The Proposed Development complements the scale, landform and pattern of the townscape and maintains the existing character. The Proposed Development results in minor improvements to the existing view.

Imperceptible/None /Neutral	The development does not affect the heritage values of the heritage assets in the view, or the view as a whole, or the ability to appreciate those values. The Proposed Development results in limited or barely perceptible changes to the existing townscape character. The Proposed Development results in limited or barely perceptible changes to the existing view. A neutral impact occurs when the development does not affect the values of the heritage assets in the view, the townscape as a whole, or the ability to appreciate its significance. <i>This does not necessarily mean that there will be no physical or visual change, rather that the resultant difference will be imperceptible or appropriately balanced.</i>
Low adverse	The development erodes to a minor extent the heritage values of the heritage assets in the view, or the view as a whole, or the ability to appreciate those values. The Proposed Development does not complement the scale, landform, and pattern of the townscape and/or detracts from its existing quality or characteristic features. The Proposed Development causes minor deterioration or visual intrusion to the existing view.
Medium adverse	The development erodes to a clearly discernible extent the heritage values of the heritage assets in the view, or the view as a whole, or the ability to appreciate those values. The Proposed Development is not characteristic of the scale, landform, and pattern of the townscape, and/or damages its existing quality or characteristic features. It includes elements that are prominent but may not be substantially uncharacteristic of the existing townscape. The Proposed Development causes noticeable deterioration or visual intrusion to the existing view.
High adverse	The development severely erodes the heritage values of the heritage assets in the view, or the view as a whole, or the ability to appreciate those values. Where the Proposed Development is at considerable variance with the scale, landform, and pattern of the townscape and/or is considerably detrimental to quality or characteristic features. It includes the introduction of elements that are prominent and uncharacteristic of the townscape. Where the Proposed Development causes major deterioration or visual intrusion to the existing view.

To determine the **overall effect** the **magnitude of impact** is assessed against the **sensitivity score** using .

Table 12: Overall Effect

	With High Value	With Medium Value	With Low Value
With high magnitude of impact	Major effect	Major effect	Moderate effect
With medium magnitude of impact	Major effect	Moderate effect	Minor effect
With low magnitude of impact	Moderate effect	Minor effect	Negligible effect
Negligible / neutral impact	Negligible effect	Negligible effect	Negligible effect

Limitations and Assumptions

In considering the effects of the proposed development upon built heritage assets, townscape character and representative viewpoints, the assessment is based on the material that accompanies the planning application, including the Accurate Visual Representations (AVRs) by Millerhare and the Design and Access Statement and scheme drawings prepared by AisFor.

The visual analysis is based on views from external spaces within the public domain and not from inside buildings or private spaces. The GLVIA3 outlines that public views are generally attributed greater value than views from private property due to the number of visual receptors being greater.

The assessment was carried out through a combination of desk-based study and site visits. However, this experience can only be demonstrated in the HTVIA through the use of photographs, AVRs, plans and maps. The 18 verified views (plus a number of unverified views) that are included within the HTVIA do not cover every possible view of the proposed development but are a selection of representative viewpoints from publicly accessible places or from points where there are particular townscape or heritage sensitivities. The viewpoint locations were agreed on following pre-application consultation with LBE, generally to give an impression of the maximum viewing presence and to explain the scheme.

The AVRs are two-dimensional and cannot fully capture the complexity of the real visual experience. They form an indication of the true three-dimensional visual experience. Neither do the AVRs capture transient significant effects arising from noise or traffic. The text accompanying each view seeks to contextualise. A visit to the location from which the photographs were taken is strongly encouraged to better appreciate and understand the visual impact.

The AVRs do not give an appreciation of kinetic views. None of the views of the proposed development are likely to be views where viewers will be stationary to appreciate the view but are likely to be views where the viewer is in motion. Again, a visit to the location from which the AVRs were taken as part

of a kinetic experience (for example walking towards, through and past the viewpoint) is strongly encouraged to better appreciate and understand the visual impact.