

Townscape and Visual Impact Assessment Addendum

CLIFTON SLIPWAYS

For Quinn Estates Ltd

June 2026

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CONTENTS

1.0 Introduction 2

2.0 Review of TVIA Baseline 2

3.0 The Revised Scheme.....4

4.0 Townscape and Visual Effects 5

5.0 Summary and Conclusion 8

CONTACT



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1.0 INTRODUCTION

- 1.1 EDLA were appointed by Quinn Estates Ltd to undertake a Townscape and Visual Impact Assessment (TVIA) of Clifton Slipways ('the Site') in respect of the following 'Proposed Development' in 2019:

"The erection of two buildings to provide a total of 227no dwellings with associated vehicle parking, highway works, and landscaping. Building one comprises of the erection of a twenty three storey tower on the north side of West Street to provide 121no dwellings with 1no business or retail unit (b1/A1) comprising 90sqm of floorspace at ground floor level; and a Building 2 from four storeys to ten storeys on the south side of West Street which will provide 106no dwellings. The proposal includes the restoration and adaptation of the existing pier structure to provide public and private amenity space to include the erection of 16 no business (b1) or short term holiday let units comprising a total of 510 sq m of floorspace, and a café (A1) comprising up to 60sq m of floorspace."
- 1.2 The TVIA was submitted as part of the planning application ('the planning application TVIA'). The Proposed Development was granted planning permission in December 2020 (ref: 20191122¹). Following the approved permission a S73 amendment was granted in 2023 for changes to the Stuart Block ('building 2 in the above description of the Proposed Development').
- 1.3 Further changes are now proposed as set out in the Design and Access Addendum – Stuart Road. The purpose of this TVIA Addendum is to review the proposed design changes and whether they will change the conclusions of the planning application TVIA. This Addendum also reviews any potential changes in industry guidelines, policy and context which may also alter the conclusions of the planning application TVIA.
- 1.4 The TVIA addendum has been undertaken by the same Chartered Landscape Architects who undertook the planning application TVIA.
- 1.5 The TVIA addendum should be read in combination with the planning application TVIA and the revised Architectural drawings.

¹ Gravesham Borough Council, <https://plan.gravesham.gov.uk/online-applications/caseDetails.do?caseType=Application&keyVal=PZRI33HPGG100>

2.0 REVIEW OF TVIA BASELINE

TVIA METHODOLOGY

- 2.1 Since the planning application TVIA, the Landscape Institute has published Technical Guidance Note 02 - 21: Assessing landscape value outside national designations (TGN 02/21). The planning application TVIA included an assessment of landscape (townscape) value using criteria similar to those within (TGN 02/21). Therefore, the TVIA assessment of value is considered to remain appropriate and accords with the revised guidelines.
- RELEVANT PLANNING POLICY AND EVIDENCE BASE DOCUMENTS.
- 2.2 Since the planning application TVIA, the following policy documents have been updated or are proposed for consultation.

National Planning Policy Framework (NPPF): proposed reforms and other changes to the planning system (2025)²
- 2.3 The consultation seeks views on the proposed approach to revising the NPPF, based upon tackling the stated housing crisis. The 'twelve key policy changes' include:

- A permanent presumption in favour of suitably located development;
 - Driving urban and suburban densification;
 - Securing a diverse mix of homes;
 - Supporting small and medium sites; and
 - Conserving and enhancing the natural environment.
- 2.4 Relevant policies are:

- S3: Presumption in favour of sustainable development;
 - S5: Principle of development outside of settlements;
 - DP1: A Strategy for Design;
 - DP2: Design Guides, Design Codes and Masterplans;
 - DP3: Key Principles for Well-Designed Places;
 - DP4: The Design Process;
 - N1: Identifying environmental opportunities and safeguards; and
 - N2: Improving the natural environment.

² Ministry of Housing, Communities and Local Government, <https://www.gov.uk/government/consultations/national-planning-policy-framework-proposed-reforms-and-other-changes-to-the-planning-system>

National Planning Policy Framework (NPPF), 2024³

2.5 The relevant NPPF policies are set out below,:

- 8 - outlining that the economic, social and environmental objectives of sustainable development;
- 96 – which aims to achieve healthy, inclusive and safe places, outlining the use of street layouts which allow for easy pedestrian and cycle connections within and between neighbourhoods;
- 124 – which outlines that planning policies and decisions should promote an effective use of land in meeting the needs for homes and other uses;
- 129 – whereby planning policies and decisions should support development that makes efficient use of land, taking account of the need to maintaining an area’s prevailing character and setting;
- 130 - which sets out area-based character assessments can be used to help ensure that land is used efficiently;
- 131 - in respect of achieving well-designed places via high quality, beautiful and sustainable buildings;
- 135 – requiring planning decisions to ensure that development will function well and add to the overall quality of the area, including being visually attractive and sympathetic to local character and history;
- 136 - in respect of new tree planting;
- 137 – requiring early consideration of design quality and engagement with communities;
- 139 – which sets out that significant weight should be given to development which promotes high levels of sustainability or that helps raise the standard of design in an area, as long as they fit in with the overall form and layout of the area; and
- 187 – requiring planning decisions to contribute to and enhance the natural and local environment.

National Planning Policy Guidance (PPG)

2.6 The following PPG are relevant to landscape and visual matters:

- Design: process and tools⁴ (2019), which explains the processes and tools that can be used through the planning system and how to engage local communities effectively;
- Light Pollution⁵ (2019), which advises on how to consider light within the planning system;
- Natural Environment⁶ (2025), which explains key issues in implementing policy to protect and enhance the natural environment, including green infrastructure and biodiversity.

National Design Guide, 2021

- This guide⁷ illustrates how well-designed places can be achieved in practice, based upon ten characteristic ‘themes’, including context, identity and nature

2.7 The Gravesham Local Plan Core Strategy (2014) and Saved Policies (1994) as set out in the planning application TVIA remain current.

2.8 Relevant policies of the Gravesham Proposed Submission Draft (Regulation 19) Local Plan⁸ are:

- LP1: Spatial Development Strategy;
- LP4: Gravesend Town Centre and Surrounds;
- LP8: Green Infrastructure and Nature Recovery;
- LP9: Climate Change; and
- LP11: Achieving high-quality design, sustainability and place making.

2.9 The Gravesham Proposed Submission Draft (Regulation 19) is supported by the Gravesham Landscape Sensitivity and Capacity Study, as well as the Gravesham Landscape Character Assessment. Both documents were reviewed as part of the planning application TVIA and therefore there has been no change to the relevant evidence base documents.

BASELINE CONDITIONS

2.10 Since the planning application TVIA, site hoardings have been implemented around the Site, along with general ground clearance at the location of the Stuart Block. The surrounding urban grain remains as per the planning application TVIA, with the Site being part of an urban grain consisting of small to medium scale block sizes. The condition of the Gravesend hospital, approximately 100m to the south-east of the Site, between Stuart Road and Bath Street has deteriorated since the planning application TVIA due to more notably damaged windows.

2.11 Similarly, the visibility of the Site remains as per the planning application TVIA, with close range views from along Stuart Road, Clifton Road and West Street, where the Site is seen in the context of residential and commercial land uses and large scale massing in Tilbury docks, including tall wind turbines.

2.12 The poor scenic quality of the Site is because of its condition. As such, the Site does not contribute positively to the quality of views and the visual sense of arrival to this part of the townscape, nor the

³ Ministry of Housing, Communities & Local Government, https://assets.publishing.service.gov.uk/media/67aaf8f3b41f783cca46251/NPPF_December_2024.pdf

⁴ Department for Levelling Up, Housing and Communities, <https://www.gov.uk/guidance/design>

⁵ Department for Levelling Up, Housing and Communities, <https://www.gov.uk/guidance/light-pollution>

⁶ Department for Levelling Up, Housing and Communities, <https://www.gov.uk/guidance/natural-environment>

⁷ Ministry of Housing, Communities and Local Government, https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/962113/National_design_guide.pdf

⁸ Gravesham Borough Council, <https://localplan.gravesham.gov.uk/Reg19/consultationHome>

cultural association of the Site. As the Site is seen between residential land uses it is an evident void in the townscape and river frontage.

2.13 Beyond close range locations to the Site, the Stuart Block part of the Site is not visible, due to the intervening buildings and vegetation. In contrast, the northern part of the Site, consisting of the redundant pier, is visible from recreational routes along the River Thames and the ferry passenger dock at Gravesend.

2.14 The townscape and visual receptors identified in the planning application TVIA are therefore considered to remain relevant for this addendum.

3.0 THE REVISED SCHEME

3.1 The following image illustrates the approved Stuart Block scheme, which proposed underground parking and 13 storeys of residential units.



Image 3-1: Extract of the approved design for the Stuart Block.

3.2 The proposed changes to the Stuart Block relevant to the TVIA are:

- Omission of the below ground parking level (Level -1);
- Retention of Levels 0-5 as per the approved planning application;
- Omission of the top 7 storeys.

3.3 The following extract of the DAS Addendum illustrates the proposed revised design of the Stuart Block.



Image 3-2: The proposed revised design for the Stuart Block.

3.4 The following cross section from the DAS Addendum demonstrates the reduction in height from the proposed building in comparison to the approved scheme.

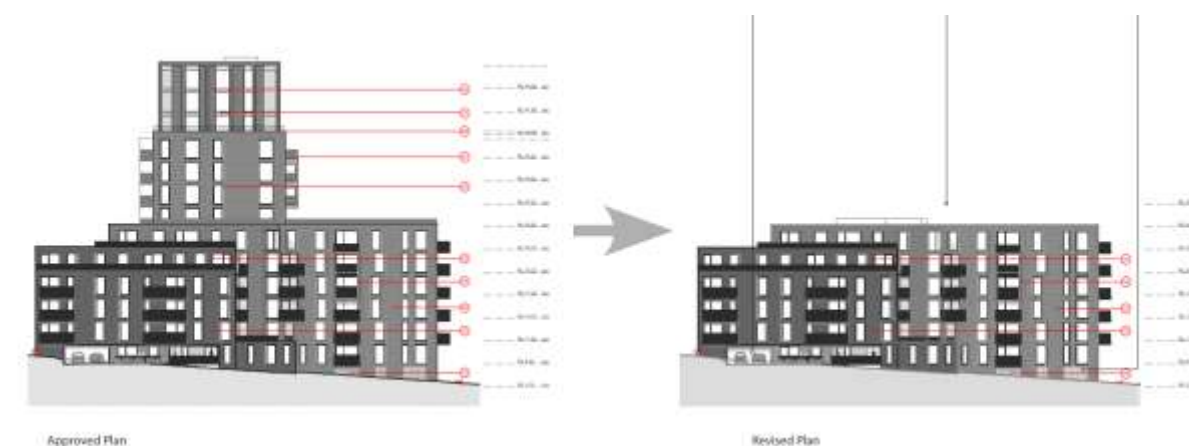


Image 3-3: Extract of the DAS cross section, comparing the approved scheme (left) with the proposed revised scheme (right).

3.5 The following extract of the proposed external landscape design also shows that the revised layout would retain a high-quality public realm and improved scenic quality to the townscape.

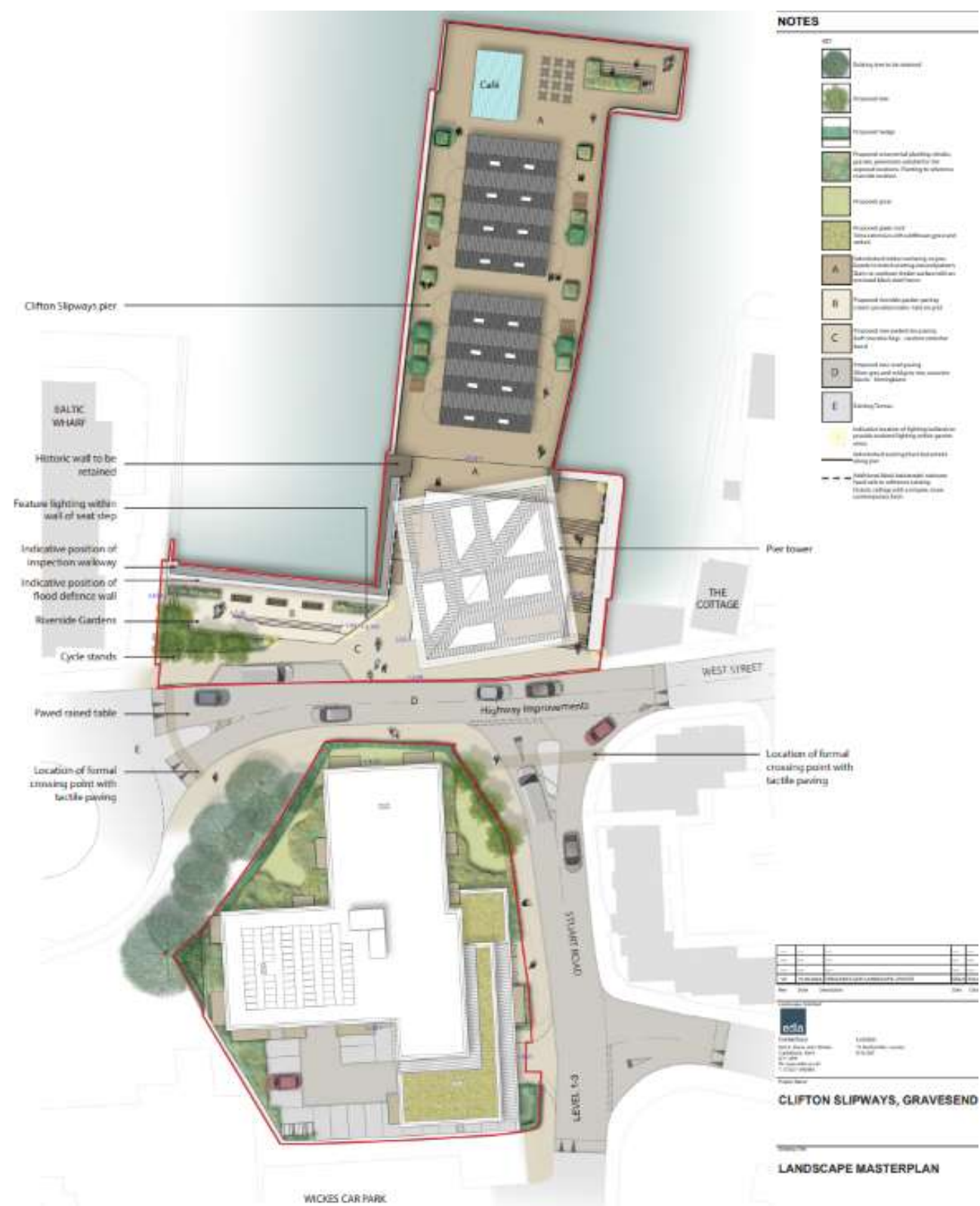


Image 3-4: Revised Landscape Masterplan

4.0 TOWNSCAPE AND VISUAL EFFECTS

TOWNSCAPE EFFECTS

Site Character

4.1 The reduction in height to the Stuart Block would not alter the beneficial change to the Site character predicted in the planning application TVIA. This is because the revisions still propose a high quality design, via a building of architectural interest due to the staggered form of the façade and the range of materials, which would reduce the perceived scale and mass of the building. The effects at the Site scale are therefore predicted to be major beneficial, reflecting that of planning application TVIA.

Published Landscape (Townscape) Character Assessments

4.2 In respect of the published landscape (townscape) character assessment, the revised design would be too small in scale to alter the character of the wider National Character Area 81: Greater Thames Estuary (NCA), such that no change is predicted to the NCA. This reflects the level of effect predicted for the approved design in the planning application TVIA.

4.3 The revised design would not alter any of the physical townscape or landscape features of published character areas C5: Tilbury Marshes (C5) and E5: Tilbury and Urban Docks (E5) as it would not be located in their geographic areas. The reduced height of the Stuart Block would reduce any perception of this part of the Proposed Development and therefore no change is predicted to C5 and E5. This reflects the level of effect predicted for the approved design in the planning application TVIA.

4.4 The Proposed Development would be located in Gravesham Town Centre. The revised design would introduce a high quality building, responding positively to the stated guidelines for improved architecture and public realm within the town centre. The lower height of the Stuart Block will more closely reflect the scale and height of surrounding existing buildings to a greater degree than the approved design. The focal point of the Pier Tower will remain, along with a positive relationship between the two buildings within the Site, enabling the overall building heights and scale to reduce between the Pier Tower and the Stuart Block, reflecting the transition between the riverside and built form to the south of the Site. The effect to Gravesham Town Centre would be minor/moderate beneficial, which is higher than the minor beneficial effect predicted for the approved design. This is because the revised Stuart Block is considered to be more sympathetic in scale to the surrounding built form, enabling a more integrated building, whilst still providing the high-quality design of the approved scheme.

4.5 The Proposed Development would be located in the Historic Town Centre Landscape Character Area. Like the approved scheme, the revised Stuart Block and the Proposed Development as a whole would improve and reinforce the ‘coherent’ legibility of the townscape.

- 4.6 The physical extent of the Proposed Development would be localised, with its perception from across other parts character area due to the height of only the Peir Tower, not the revised Stuart Block. The Proposed Development would positively change the architectural quality of the character area, and this would be a permanent and long term change. The predicted effects would be moderate beneficial, reflecting that of the approved scheme.
- 4.7 There would be a reduced perception of the Proposed Development from character area 1a: Town Centre, due to the lower height of the Stuart Block. The revised design would provide an improved relationship between the scale and height of built form in area 1a, such that the effects are predicted to be minor/moderate beneficial, in comparison to the minor beneficial effects from the approved scheme.
- 4.8 The Proposed Development would be located in area 1b: Retail Park. The revised Stuart Block and the Pier Tower would retain a co-ordinated and unified grouping of buildings in combination with the Baltic Wharf to the west of the Site. The vegetation cover across 1b would be improved via the new planting across the Site, and the new recreational access to the pier would improve the cultural association of the character area and provide new opportunities for views of the River. The effects are predicted to be moderate beneficial, reflecting those for the approved scheme.

Conservation Areas

- 4.9 There would be no change to the character of the Conservation Areas identified in the planning application TVIA, due to the Proposed Development not being within their geographic areas and that the lower height of the Stuart Block would not be perceived. With no change predicted to the character of the Conservation Areas it reflects the level of effects predicted for the approved design in the planning application TVIA.

TOWSCAPE EFFECTS SUMMARY

- 4.10 From the above the following table sets out and compares the predicted landscape/townscape effects for the revised design in comparison to those predicted for the approved scheme during the operational phase. The construction effects are not set out, as it is assessed these would remain the same as per the approved scheme.

Table 4-1: Landscape Effects Summary with revised effects highlighted in yellow

Landscape / Townscape Receptor	Approved Scheme Effects	Revised Scheme Effects
The Site	Major Beneficial	Major Beneficial
Natural England National Character Area 81: Greater Thames Estuary	No Change	No Change
Natural England National Character Area 113: North Kent Plain	No Change	No Change
C5 Tilbury Marshes	No Change	No Change
E5: Tilbury and Docks Urban Area	No Change	No Change

Landscape / Townscape Receptor	Approved Scheme Effects	Revised Scheme Effects
Gravesham Town Centre (GTC) and 'the riverside'	Minor Beneficial	Minor/Moderate Beneficial
Historic Town Centre Cover	Moderate Beneficial	Moderate Beneficial
1a Town Centre	Minor Beneficial	Minor/Moderate Beneficial
1b Retail Park	Moderate Beneficial	Moderate Beneficial
Industrial Hinterland	No Change	No Change
Victorian/Edwardian suburbs	No Change	No Change
Inter/Post War Suburbs	No Change	No Change
Modern Suburbs	No Change	No Change
Northfleet	No Change	No Change
Overcliffe Conservation Area	No Change	No Change
High Street and Queen Street	No Change	No Change
Harmer Street	No Change	No Change
Milton Place	No Change	No Change
King Street	No Change	No Change
Upper Windmill Street	No Change	No Change
Darnley Road	No Change	No Change
Pelham Road / The Avenue	No Change	No Change
Gravesend Riverside	No Change	No Change
Windmill Hill	No Change	No Change

- 4.11 From the above table, the landscape and townscape effects from the revised Stuart Block are assessed as remaining very similar to that of the approved scheme. There would be an improved relationship between the existing built form and the revised Stuart Block due to the reduction in its height, such that at a local scale, several of the townscape effects are considered to slightly improve, whilst the Proposed Development as a whole remains beneficial to the townscape, due to the improved condition, scenic quality and appearance resulting from the Proposed Development.

VISUAL EFFECTS

- 4.12 This planning application TVIA identified 28 visual receptors ('people') with potential views of the Proposed Development. As the revised Stuart Block is lower in height, the overall visibility of this part of the Proposed Development is reduced, whilst views of the Pier Tower and external landscape design would remain as per the approved scheme. The following section focuses on those receptors with views orientated specifically towards the Stuart Block.

2. Residential receptors on Stuart Road

- 4.13 The revised Stuart Block would be visible at close range for residents, like the approved scheme, providing a high-quality building and external public realm within the composition of the view. The main difference from the approved scheme, would be that the reduced height of the Stuart Block would result in less foreshortening to the view and an increased visibility of the sky, due to the reduction in height. The high architectural quality and public realm is considered to result in a moderate/major beneficial effect. This is in comparison to the moderate beneficial effect of the approved scheme, as the revised scheme results in less foreshortening to the view.

3. Pedestrians at the junction of Stuart Road and the A226

- 4.14 The revised Stuart Block would be seen at the same scale and height as surrounding buildings across the channelled composition of the view. The Pier Tower would form a focal point within the composition of the view. The effect would be minor beneficial, mirroring that of the approved scheme as whilst less of the Stuart Block would be visible, this is balanced by an increase in the visibility of the Pier Tower.

5: Residential receptors at West Street and Stuart Road

- 4.15 The revised Stuart Block would visually reflect the scale and height of surrounding built form, as well as being seen in the context of taller residential massing in the background of the view. In comparison to open views across the Site, the composition of the view would become more channelled in extent, along Clifton Road. The high-architectural quality and external public realm around the revised Stuart Block would provide a high scenic quality to the composition of the view, with the reduced height of the Stuart Block resulting in less foreshortening to the view. The effects are predicted to be moderate/major beneficial in comparison to the moderate beneficial effects of the approved scheme. This is due to the revised design being more sympathetic to the composition of the view, whilst providing the same beneficial changes through the design quality.

12. Recreational users on National Cycle Route 1

- 4.16 The Stuart Block would be visible beyond Baltic Wharf, along with the regeneration of the pier and the upper parts of the Pier Tower. The form and building materials across the revised Stuart Block would provide visual interest to the view. The effect is predicted to be minor beneficial, reflecting that of the approved scheme. Whilst less of the Stuart Block would be visible in comparison to the approved scheme, other visible elements of the Proposed Development, such as the improved condition of the pier, retain the minor beneficial effect.

16. Pedestrians on Bath Street

- 4.17 The Stuart Block would be visible, due to channelled views along Clifton Street. The revised design would result in the Stuart Block being seen as reflecting the scale and height of buildings along Bath Street, with a similar stepped horizontal roof profile. The revised design would provide less of a focal point in comparison to the approved scheme due to its reduced height, but would retain the same visual interest to the view via the building form, materials and the external landscape design. The effect would be negligible beneficial, in comparison to the minor beneficial effect of the approved scheme. This is due to the reduced visual variation on the skyline in comparison to the approved scheme.

24. Recreational users on Windmill Hill

- 4.18 Only the upper storey of the revised design for the Stuart Block would be visible. This would enable views across the southern part of the Site to the River Thames, with the Pier Tower seen as a focal point

to in the view. There would be a visual link between the Pier Tower and the Stuart Block due to the tone of the architectural facades. The effect would be moderate beneficial, which mirrors that of the approved scheme, as the changes to the composition of the view is considered to be from the Pier Tower overall.

27. Recreational users on the PRow along the north bank of the River Thames

- 4.19 A small part of the western façade of the revised Stuart Block would be visible, whilst the remainder of the building would be screened by the Pier Tower. The effects would be moderate beneficial, mainly due to the visual improvements to the pier and the Pier Tower. This mirrors the effects predicted for the approved scheme, as the same amount of the Stuart Block would be visible in the view.

VISUAL SUMMARY

- 4.20 From the above, the following table summarises the visual effects for the relevant receptors and the comparison with the revised scheme.

Table 4-2: Visual Effects Summary.

Visual Receptor	Approved Scheme Effects	Revised Scheme Effects
1. Pedestrian and motorists on West Street	Moderate Beneficial	Moderate/Major Beneficial
2. Residential receptors on Stuart Road	Moderate Beneficial	Moderate/Major Beneficial
3. Pedestrians at the junction of Stuart Road and Overcliffe Road (A226)	Minor Beneficial	Minor Beneficial
4. Recreational users on PRow adjacent to the River Thames	Minor Beneficial	Minor Beneficial
5. Residential receptors at West Street and Stuart Road	Moderate Beneficial	Moderate Beneficial / Major Beneficial
6. Residential receptors on West Street	Moderate Beneficial	Moderate Beneficial
7. Residential receptors on West Street	Moderate Beneficial	Moderate Beneficial
8. Pedestrians and motorists on Bath Street	Moderate Beneficial	Moderate Beneficial
9. Pedestrians and visitors to St. George's Church	Moderate Beneficial	Moderate Beneficial
10. Pedestrians on West Street and High Street	Minor Beneficial	Minor Beneficial
11. Recreational users on National Cycle Route 1	Minor Beneficial	Minor Beneficial
12. Recreational users on National Cycle Route 1	Minor Beneficial	Minor Beneficial
13. Recreational users at The Shore	Minor Beneficial	Minor Beneficial
14. Motorists along Thames Way	Moderate Beneficial	Moderate Beneficial
15. Retail park users and workers	Minor Beneficial	Minor Beneficial
16. Pedestrians on Bath Street	Minor Beneficial	Negligible Beneficial
17. Pedestrians on Bath Street	Moderate Beneficial	Moderate Beneficial
18. Foot passengers at Gravesend pier	Moderate Beneficial	Moderate Beneficial
19. Motorists on the approach to the town centre	Minor Beneficial	Minor Beneficial
20. Recreational users in Community Square	Minor Beneficial	Minor Beneficial
21. Pedestrians at Gravesend Railway Station	Minor Beneficial	Minor Beneficial
22. Residents on the A228	Minor Beneficial	Minor Beneficial
23. Pedestrians and motorists on the A228	Minor Beneficial	Minor Beneficial
24. Recreational users on Windmill Hill	Moderate Beneficial	Moderate Beneficial
25. Foot passengers at Tilbury ferry terminal	Moderate Beneficial	Moderate Beneficial

Visual Receptor	Approved Scheme Effects	Revised Scheme Effects
26. Workers at Tilbury Docks	Minor Beneficial	Minor Beneficial
27. Recreational users on PRoW along north bank of River Thames	Moderate Beneficial	Moderate Beneficial
28. Visitors at Tilbury Fort	Moderate Beneficial	Moderate Beneficial

4.21 From the above only 7 of the 28 views identified in the TVIA are relevant to the revised design of the Stuart Block, as from the other views, the intervening buildings or distance would screen the Stuart Block, with the change to the composition of the view relating only to the Pier Tower. Therefore, for the majority of the visual receptors, the effects remain as predicted for the approved scheme.

4.22 The revised Stuart Block design would retain the high visual quality and interest to the street scene as per the approved scheme. In close range views, the lowered height of the Stuart Block would reduce the overall extent of foreshortening of views, as well as increase the extent of the skyline in comparison to the approved scheme. The effects to close range views are assessed as being very slightly improved as a result, ranging between moderate/major beneficial.

5.0 SUMMARY AND CONCLUSION

Baseline

- 5.1 There are no changes to the townscape / landscape and visual context, nor published studies and policies since the validation of the planning application which are considered to alter the TVIA baseline.
- 5.2 Industry standard revisions to the assessment of townscape (landscape) value would not alter the TVIA methodology due to similar criteria being used. The townscape and visual receptors and their sensitivity to the Proposed Development are therefore considered to remain as per the planning application TVIA.

The Revised Proposed Development

- 5.3 With reference to the revised Architectural Drawings and Landscape Masterplan, the main change is the reduced height of the Stuart Block in the southern part of the Site, via the removal of the top 7 storeys. The high-quality design and external landscaping are retained on the revised design, as well as the taller built form of the Pier Tower in the northern part of the Site.

Revised Landscape and Visual Effects

- 5.4 In townscape terms the revised Stuart Block would retain the beneficial townscape effects as per the approved scheme. This is because the revised Stuart Block would retain the stepped façade, building materials and form as per the approved scheme, resulting in a notably improved condition to the Site and higher scenic quality. At the local scale, the reduced height of the Stuart Block would respond more sympathetically to the scale and height of surrounding built form, such that slight increases in the beneficial effects are predicted in comparison to the approved scheme.

- 5.5 Visually, the revised Stuart Block would be visible from a low number of the identified visual receptors, and the main changes to the composition of views would be via the taller Pier Tower and the improvements to the pier. In close range views, the reduced height of the Stuart Block would result in less foreshortening to views and an increase in the visible extent of the skyline. A slight increase in the beneficial visual effects is predicted for these close range receptors due to the revised Stuart Block.

Conclusion

- 5.6 The Proposed Development, including the revised Stuart Block design, would substantially improve the condition of the Site, its architectural quality and its recreational value.
- 5.7 The Proposed Development would re-establish the cultural association of the Site and the perception of both the arrival to the north-west part of Gravesend and the River Thames from within the wider townscape. The extent of new planting would substantially increase the vegetated structure of the Site and the local townscape.
- 5.8 Even with the reduced height of the Stuart Block, the Proposed Development would represent a contemporary and imaginative building design within the local townscape and establish a new 'sense of place' to this part of the townscape.
- 5.9 The reduced height would enable the Stuart Block to relate more closely to the scale of the surrounding built form, and reduce the extent of foreshortening in close range views, such that a very slight increase in beneficial townscape and visual effects is predicted.
- 5.10 The revised townscape and visual effects do not materially differ in comparison to the townscape and visual effects predicted for the approved scheme. The revised Proposed Development remains a new landmark on the skyline, improving a derelict part of the town centre with high quality design, new public access and regeneration of a culturally important pier.