

Townscape and Visual Appraisal

**Prior Approval application for the construction
of two additional storeys of residential
apartments to Joynes House**

Joynes House,

New Road,

Gravesend,

DA11 0AJ

On behalf of Joynes House Development Limited

Date: 18 August 2022 | Pegasus Ref: P22-0541EN

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1. INTRODUCTION

- 1.1 This Townscape and Visual Appraisal (TVA) has been prepared on behalf of Joynes House Development Limited (the Applicant) in support of a Prior Approval application for the construction of two additional storeys of residential apartments to the existing five storey commercial building known as Joynes House. The property is located at New Road in Gravesend, DA11 0AJ (refer to Figure 1 Site and Viewpoint Location Plan). Gravesham Borough Council is the relevant planning authority (hereafter referred to as 'the Council').
- 1.2 The site is currently occupied by a five storey Joynes House with pedestrian access from the A226 / New Road to the north and from St. James's Road to the south, via a car park that forms part of the site.
- 1.3 The Landscape Institute's Technical Information Note 05/2017 (Revised April 2018) advises that **"...townscape, like the rural landscape, reflects the relationship between people and place and the part its plays in forming the setting to our everyday lives. It results from the way that the different components of our environment – both natural and cultural – interact and are understood and experienced by people."**¹ The term 'landscape' is therefore synonymous with the term 'townscape' when considering an application site such as this in the urban context.
- 1.4 New built form in urban environments tends to give rise to effects, not necessarily adverse, within the townscape by virtue of a number of attributes specific to both their individual form, their location, and mass of the built form. These attributes that are of most relevance to townscape and visual matters typically include the geometric form, particularly visible in the form of elevations; comparison in terms of scale, height, and materials; relationship with the surrounding environment, mainly built form; relationship with landmarks and key open spaces; and relationship to the scale and nature of the existing elements of the townscape.
- 1.5 Given the proposed typology – being an upward extension to the existing built form, its comparatively small scale and restrained style, the above mentioned attributes become less problematic. It is prudent, however, to review the issue of scale and

¹ Landscape Institute TIN 05/2017 (Revised April 2018), Page 4, Paragraph 2.1.

massing, and how the proposed extension is perceived from the surrounding townscape.

- 1.6 The TVA scope of work follows good practise and the *Guidance for Landscape and Visual Impact Assessment (GLVIA)*². Attributes of the proposed development may affect different components of the townscape in different ways, or may combine to result in an effect. The assessment concentrates on the change that the proposal will bring to the different attributes of the townscape or view on the basis of the magnitude of that change and the sensitivity of the receptor. This is further explained in Section 2 of this Appraisal and the accompanying Appendix 1.
- 1.7 This TVA has been undertaken by Chartered Member of the Landscape Institute (CMLI) and this Appraisal should be read in conjunction with the supporting Planning Statement prepared by Gemini Planning; and planning application drawings prepared by Barron Edwards Planning & Architecture.
- 1.8 Most importantly the scope of work for this TVA is guided by Paragraph B of Part 20 of the General Permitted Development Order 2015 (GDPO), which sets out Class AA Prior Approval procedures, relevant to this planning application.
- 1.9 In this regard, the purpose of this TVA is to provide an assessment relating to the external appearance of the building and how any potential effects (if any) may be mitigated. This is further explained in the Planning Statement prepared by Gemini Planning.

2. METHODOLOGY AND SCOPE OF WORK

- 2.1 Landscape (both rural and urban) is defined in the European Landscape Convention **"...as an area perceived by people whose character is the result of the action and interaction of natural and/or human factors"**. Visual considerations relate specifically to the views afforded to people. These separate but related issues form the basis of this Appraisal.
- 2.2 This Appraisal is written with regard to the current best practice documentation including:
 - *Guidelines for Landscape and Visual Impact Assessment* (3rd Edition, 2013) - Landscape Institute / Institute of Environmental Management and Assessment.

² GLVIA, third edition, written by IEMA and the LI, 2013.

- GLVIA3 Statements of Clarification.
 - Landscape Institute's *Technical Information Note* 05/2017 (Revised April 2018)
 - *An Approach to Landscape Character Assessment* (2014) - Natural England.
 - *An approach to landscape sensitivity assessment – to inform spatial planning and land management*, June 2019.
 - *Advice Note 4: Tall Buildings* (2015) Historic England.
- 2.3 The photographic evidence has been prepared with regard to the Technical Guidance Note 06/19 published 17th September 2019 by the Landscape Institute: *Visual Representation of Development Proposals*. This Appraisal follows the new guidance with all viewpoints illustrated as the so-called Type 1 photographic evidence.
- 2.4 Detailed assessment methodology, approach and criteria are described in **Appendix 1** to this Appraisal.
- 2.5 The townscape and visual appraisal of the proposed development has been conducted with reference to paragraph 7.13 of GLVIA3 which states:

"This section sets out how development proposals at different stages in the planning process, whether of the same or different types, should be treated in assessing cumulative landscape and visual effects. Taking 'the project' to mean the main proposal that is being assessed, it is considered that existing schemes and those which are under construction should be included in the baseline for both landscape and visual effects assessments (the LVIA baseline). The baseline for assessing cumulative landscape and visual effects should then include those schemes considered in the LVIA and in addition potential schemes that are not yet present in the landscape but are at various stages in the development and consenting process:

- **Schemes with planning consent;**
- **Schemes that are the subject of a valid planning application that has not yet been determined."**

- 2.6 In turn, Table 3.1 of the GLVIA3 gives a brief description of action required with regard to the baseline which states:

"Establishes the existing nature of the landscape and visual environment in the study, including any relevant changes likely to occur independently of the development proposal. Includes information on the value attached to the different environmental resources."

2.7 Accordingly, the recently permitted planning applications, and those pending consideration, in Gravesend are considered to form part of the baseline situation. These relevant to this TVA are listed in Table 1 below and referenced where appropriate. The planning application documents, associated with the below listed developments, have been reviewed to inform this TVA and the viewpoint selection in particular.

Table 1 Recent permitted and 'in planning' applications in Gravesend		
Planning Application Reference Number	Address	Height parameters (based on planning application drawings).
Applications Permitted		
20120931	The Heritage Quarter Land Between West Street, Bath Street, Royal Pier Road and Queen Street, Excluding the High Street Gravesend Kent.	Between +22.00m and +34.00m Above Ordnance Datum (AOD).
20190504	Former Gravesend & North Kent Hospital (M Block) Bath Street Gravesend Kent.	11 storey tower and up to 6 storey apartment block.
20191122	Clifton Slipways West Street Gravesend Kent.	23 storey tower approx. +79.00m AOD, max. height approx. +86.00m AOD. Lower tower 12 storey high, approx. +48.00m AOD.
Pending Consideration		
20210453	Former Cinema Site 11 King Street Gravesend Kent DA12 2EB.	Up to 9 storeys.
20161205	Former Police Station 133 Windmill Street Gravesend Kent DA12 1DB.	Up to 7 storey.
20211540	Lord Street Car Park Lord Street Gravesend Kent.	4 to 7 storey buildings and up to 13 storey tower.

2.8 The guidance provided in the policy documents, discussed later in this Appraisal, is also used to inform the assessment of the proposed development.

2.9 The scope of work and viewpoint selection for this Appraisal has not been subject to the consultation with the Council, due to the nature of the proposed application. The approach and viewpoint selection, however, are considered to be appropriate and proportionate to the scale of the proposed development, given its location and characteristics. The approach in this Appraisal is based on Pegasus' experience in dealing with TVIA / TVA issues, including tall building assessments elsewhere in the country.

3. SITE AND PROPOSED DEVELOPMENT

- 3.1 The site is located along the A226 / New Road, which is one of the main streets associated with Gravesend town centre and is recognised as being part of the highways network primary distributor. Vehicular traffic is permanent throughout the day and characterises the local townscape. New Road extends east as King Street, which acts as the main shopping street in Gravesend.
- 3.2 The proposed development would include the construction of two additional storeys on top of the existing five storey high commercial building known as Joynes House. The application drawings and Design Statement prepared by Barron Edwards Planning & Architecture explain the fenestration, arrangement of balconies, and proposed materials.
- 3.3 Apart from modest changes to the front elevation, the proposals do not include any other changes to the fabric of the existing building, its landscaped area, existing access, or car parking.
- 3.4 The elevation of the upper two storeys would be clad in composite panels of dark grey colour (slate colour or similar) in order to be recessive and complement the relatively dark red brick of Joynes House and other built form around it. Such colour has been considered appropriate to the surrounding townscape whilst purposely avoiding any relationship with the colour palette of the nearby conservation area. The restrained detailing and modest articulation of the proposed extensions is deliberate to create a simple and recessive element that is assertive yet not detracts from the surrounding townscape and its features. The recessed balconies on the top floor (6th floor) emphasise the residential use and break up the elevation into finer grain. Accessible private terraces along the 5th floor would be secured by a balustrade that wraps around the parapet of the building.
- 3.5 Whilst the proposed scheme and this TVA is based on a set of elevation drawings and particular colour palette developed by the client and their architects, the colours and materials could be discussed and agreed with the Council should this be considered beneficial.

Site Clearance, Demolition and Tree Removals

- 3.6 As explained above, the proposed development would not require any substantial site clearance or demolition work. Any pre-commencement site works would be

highly localised and limited, to serve the construction stage. The construction activities and compound would fall within the open and unconstrained area of the site such as the car park and circulation space around Joynes House.

Building Mass, Scale, Form and Appearance

- 3.7 The existing built form is a five storey office block, strongly linear and of rectangular footprint, addressing New Road to the north. Darnley Road forms the site's eastern edge with vehicular access into the associated car park gained from St. James's Road to the south.
- 3.8 Joynes House is best described as a relatively large mass building, largely due to its linear form rather than height. The simple profile and rectangular footprint result in a building that is somewhat visually unrelieved. Two external glazed fire escape stairs mark the building either side, at its shorter western and eastern elevations. The glazed staircases are painted in dark brown colour imitating bronze effect. The fire escape stairs help break up the monotony of the slab and are recessive in terms of colour.
- 3.9 The flat roof is hidden by a low parapet wall with the lift shaft protruding above. The existing fenestration emphasises the linear form of the building and the eye is drawn along its elevation rather than towards its rooftop. The existing trees along the front of Joynes House help break up its mass and scale, and reduce the 'corridor' effect of the A226 / New Road.
- 3.10 In terms of building material, the elevation is largely clad in red brick. A low perimeter wall, in red brick, marks the northern and eastern edge of the site. Large panes of glass, set within metal frames create a perception of continuous bands of glazing, separated by layers of red brick.



Plate 1 Joynes House, eastern and northern elevations.



Plate 2 Joynes House, western and northern elevations.



Plate 3 Joynes House, perimeter wall along the eastern edge and trees along the A226 / New Road.

4. PLANNING POLICY AND GUIDANCE

- 4.1 Planning Statement, submitted as part of the planning application, considers the proposed development in the context of the relevant planning policies. The following paragraphs discuss only those planning policies and guidelines that are relevant to townscape and visual issues.

National Planning Policy Framework

- 4.2 The revised *National Planning Policy Framework (NPPF)* was published in July 2021 and sets out the governments planning policies for England and how these are expected to be applied.
- 4.3 The NPPF promotes a presumption in favour of sustainable development, defined as, **"...as meeting the needs of the present without compromising the ability of future generations to meet their own needs..."** (paragraph 7, page 5) providing it is in accordance with the relevant up-to-date local plan and policies set out in the *NPPF*, including those identifying restrictions with regard to designated areas.
- 4.4 The social objective of the *NPPF* (paragraph 8, page 5) aims: **"... to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being..."**.
- 4.5 The *NPPF* identifies a number of aspects, which should be considered in developing local plans and reviewing planning applications. Those with regard to townscape and visual issues are considered in Section 12 'Achieving well-designed places' and Section 16 'Conserving and enhancing the historic environment'.
- 4.6 Section 12 'Achieving well-designed places' provides guidance on ensuring the delivery of good design (paragraph 126, page 38): **"The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities"**.
- 4.7 The revised *NPPF* requires planning policies and decision makers to promote development that is sympathetic to local character and be visually attractive, whilst

not discouraging innovation, change, or more effective land use, paragraph 130 (pages 38 – 39):

“130. Planning policies and decisions should ensure that developments:

a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;

b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;

c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);

d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;

e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and

f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.”

4.8 Section 15, Conserving and enhancing the natural environment, paragraph 174 on page 50 states that:

“Planning policies and decisions should contribute to and enhance the natural and local environment by:

a) protecting and enhancing valued landscapes, Sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);

b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland...

d) minimising impacts and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures...

f) remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate."

Planning Practice Guidance (PPG) Design: Process and tools (October 2019)

- 4.9 The *PPG Design: Process and tools*, which supports the *NPPF*, provides advice to Local Planning Authorities with regard to the weight attached to design and sustainability in decision making process (paragraph 001, Revision date: 01 10 2019):

"...permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions, taking into account any local design standards or style guides in plans or supplementary planning documents. Conversely, where the design of a development accords with clear expectations in plan policies, design should not be used by the decision-maker as a valid reason to object to development."

- 4.10 The *PPG* goes on to reference the National Design Guide, which identifies ten characteristics: context, identity, built form, movement, nature, public spaces, uses, homes and buildings, resources, and lifespan. It also reinforces the role local design guides and masterplans can play in the decision making process.

Gravesham Local Plan Core Strategy

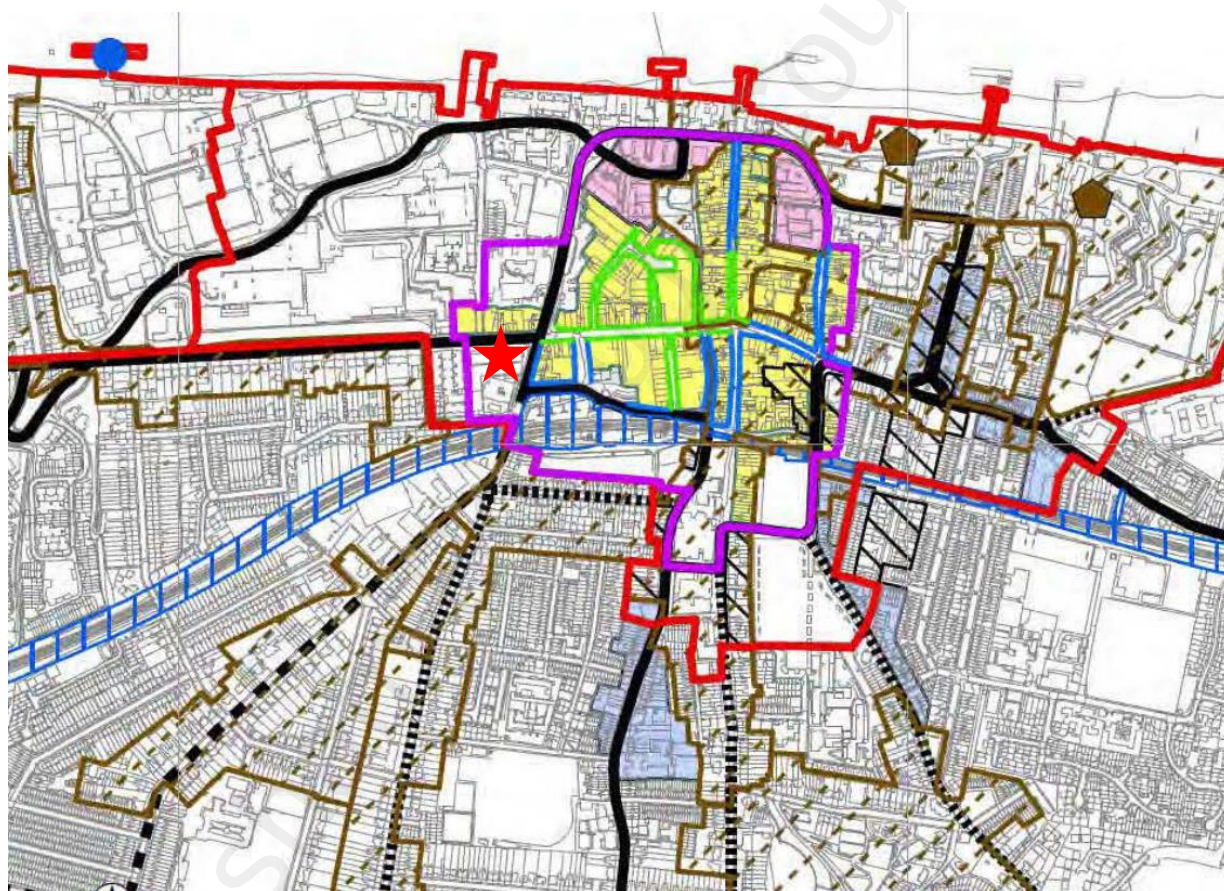
- 4.11 The proposed application, being a Prior Approval application, has to be judged against the policies outlined in the *NPPF*. The policies in the Local Plan, are informative and help guide the baseline studies for this TVA, but they do not form the basis for the assessment criteria.
- 4.12 The Development Plan for the Council currently comprises the *Gravesham Local Plan Core Strategy* and *Policies Map* (September 2014) and saved policies in the *Gravesham Local Plan First Review* (November 1994).
- 4.13 According to the *Gravesham Local Plan Core Strategy Policies Map*, the site is located in the Gravesend Town Centre, identified in Policy CS08 'Retail, Leisure and the Hierarchy of Centres'. It is also subject to Policy CS05 'Gravesend Town Centre Opportunity Area' and falls on the western edge of its sub-area 3.1 'Town Centre'.
- 4.14 Policy CS05 'Gravesend Town Centre Opportunity Area' and its supporting text outline the Council's aspiration for an attractive and well connected urban

environment. The Core Strategy also recognises (its paragraph 4.6.4) that: **“Town centres need to constantly reinvent themselves if they are to remain relevant to the people who use them and to keep the mix of uses up to date and vibrant”** It goes on to say that: **“As the Opportunity Area has significant heritage interest, its form influences where new units designed to meet modern commercial needs can be located”**. The policy and its supporting text do not provide any advice with regard the townscape character issues. With the proposed development being an extension to the existing building, this issue, however, falls away.

- 4.15 Whilst Policy CS19 ‘Development and Design Principles’ relates, strictly speaking, to new development that typically require a planning permission, it is informative with regards the Council’s aspiration to achieve good design and attractive built environment: **“New development will be visually attractive, fit for purpose and locally distinctive. It will conserve and enhance the character of the local built, historic and natural environment, integrate well with the surrounding local area...”** and **“...the design, layout and form of new development will be derived from a robust analysis of local context and character and will make a positive contribution to the street scene, the quality of the public realm and the character of the area. Account will be taken of the scale, height, building lines, layout, materials and other architectural features of adjoining buildings. Account will also be taken of the wider site context, including strategic views, site topography, the significance of heritage assets and features of townscape and landscape value which contribute to local character and sense of place...”**. At the same time, the Core Strategy refers to the Council’s own published *Gravesend Townscape Appraisal* (June 2008), which is further examined in Section 5 of this TVA.
- 4.16 With regard the issues around townscape character, there are a number of conservation areas within Gravesend, which extent into the town centre and are located in close proximity to the site (refer to Plate 4 below). Policy CS20 ‘Heritage and the Historic Environment’ deals with the issue. The Overcliffe Conservation Area and Darnley Road Conservation Area are the closest such designations. The Upper Windmill Street Conservation Area and Windmill Hill Conservation Area also lie in close proximity with the latter covering a localised higher ground in Gravesend. The published conservation area appraisals are informative and identify various

associated character areas, positive and negative features, and views. This is further discussed in Section 5, which deals with townscape character effects.

- 4.17 The review of the *Gravesham Local Plan First Review Saved and Deleted Policies Version* (September 2014), including its Section 6 'Townscape, Conservation and Design' did not reveal any 'saved' policies that would be informative to this TVA or the site.



 Conservation Areas (Policy CS20)

 Application Site

Plate 4 Extract from the Gravesham Local Plan Core Strategy Policies Map (adopted September 2014)

5. TOWNSCAPE CHARACTER AND VISUAL EFFECTS

- 5.1 Whilst a detailed townscape characterisation study falls outside of the scope of work of this TVA the following description provides a succinct analysis of the site's urban context, identifying prevailing characteristics of the local townscape, and discusses them in the content of the Council's own published *Gravesend Townscape Appraisal* (June 2008).

Baseline

- 5.2 The site falls within Gravesend town centre, which is best described as a relatively complex urban environment characterised by retail premises which activate the street scene; built form of varied scale and mass and architectural style; movement, both vehicular and pedestrian; and varied uses. The published *Gravesend Townscape Appraisal* (June 2008), hereafter referred to as the *Appraisal*, places the site within the south western extremities of the Character Area 1 'Historic Town Centre Core' and its sub-area 1a 'Town Centre'. The published *Appraisal* appears to be the only document that deals with townscape character issues across Gravesend. The Conservation Area Appraisals have also been reviewed to inform the baseline and assessment of townscape character effects. These are referenced below where appropriate.
- 5.3 The following paragraphs should be read in conjunction with **Figure 2** Townscape Character and **Figure 3** Context Baseline Views.
- 5.4 The *Appraisal* identifies that the area is characterised by views across the River Thames: **"North of the town centre the riverside edge provides extensive views of the River Thames itself and across the river to Thurrock, with Tilbury Power Station forming a prominent feature. The variety of cranes, masts, mudflats and the activity of the tankers and other boats all add to the character and interest of these views. There are also views along the banks of the River Thames of the various piers and jetties that break up the continuum of the rivers edge."** Whilst this is true for the northern edge of the character area where the relationship with the River Thames is the strongest, views from the core of the 'Historic Town Centre Core' character area are largely internal and focused on the immediate urban environment. Channelled northward looking views along side streets do exist but are infrequent and are heavily influenced by varied built form; the river is often obscured (refer to Figure 2 View C: Darnley Road overbridge near Joynes House and View E: Windmill Street near Clarence Place).

- 5.5 Changes in levels across the site associated with the car park, the pedestrian access, and the landscaped area, are artificial. Otherwise, the topography across the town centre is simple and relatively level, although there is a detectable slope towards the River Thames. This is particular visible along the roads aligned north to south, such as Bath Street or High Street. In addition, there is a relatively abrupt change in levels along the A226 / New Road further west of the site. To the south east of the site the topography gently rises and culminates as Windmill Hill allowing views across the urban environment. The area around Joynes House does not form part of this experience. Views along main roads and streets are focused on the immediate complex townscape, which includes varied architectural styles, predominantly 2 to 3 storey high built form, vehicular and pedestrian movement.
- 5.6 With regard the land use the *Appraisal* is useful in confirming the robustness of the townscape, which has evolved largely over the 19th and 20th century: **"...range of different building styles from 3-storey Victorian and Edwardian properties to large glass fronted 1970's units."** It goes on to state: **" However the historic town centre has developed a level of flexibility and robustness within its built environment, which now supports a range of services. The fabric of the historic town has been well maintained, and even though there are some more modern additions to the town, such as the recently built hospital, its land use functionality has not been compromised. To the south of the town centre is a collection of office blocks creating an administrative centre that complements the nearby commercial activity located in the heart of the town centre."**
- 5.7 With regard the predominant colour palette and materials, the *Appraisal* recognises that the built environment is varied and complex with the built form in the historic core incorporating yellow brick, often white rendered, such as those along High Street. These are often associated with the 19th Century phase of Gravesend's development, with a Victorian core dominating the town centre, particularly within the designated 'Historic Quarter'. The strongly coherent Georgian terrace along Harmer Street is particularly worth mentioning due to the quality of the townscape but is located in the eastern part of the town centre. These areas of attractive townscapes and development along High Street are separated from the site by areas of undesignated built environment.

- 5.8 To respond to this complexity, the proposed materials and colour palette have been deliberately chosen to be simple , muted, recessive, and not attracting any undue attention.
- 5.9 Whilst other areas within the 'Historic Town Centre Core' are coherent and uniform in character, the townscape along New Road, and in parts along High Street, includes late 20th century development, which affects its grain and streetscene. This is recognised in the published *Appraisal*: **"However, along the High Street and New Road, some of the original buildings have been replaced by offices and shops, built around the 1960/70s. Despite Gravesend's rich history and large number of significant historic buildings, there are many examples of poor quality 20th century developments which now dominate the streetscape."** High Street and New Road, therefore, include a variety of built form, grain, height, and architectural styles. The St George Shopping Centre is an example of large scale and mass built form of large footprint with its multi-storey car park influencing the streetscene. The scale and mass of the Shopping Centre, however, is not apparent from New Road with its arcade and entrance being surrounded by fine grain built form either side and assimilated into the streetscene, Views from Bath Street near the site, however, are unattractive and terminate on its utilitarian car park.
- 5.10 The *Appraisal* identifies a number of landmarks, largely listed buildings, such as the County Court, NatWest Bank, Gravesend Library, and the Jubilee Clock Tower. These features do not appear simultaneously with Joynes House as part of the same streetscene. The presence of modern or late 20th century development is also recognised, such as St George Shopping Centre and the aforementioned recently developed Gravesham Community Hospital. These elements of the townscape, however, are not identified as being positive or negative:
- "There are a number of more modern landmark buildings located around Gravesend, and act as such, more because of their scale, mass and location than their architectural or aesthetic qualities. An example of this is St George Shopping Centre, which acts as a centrally located landmark in Gravesend, situated on a key node."**
- 5.11 The *Appraisal* recognises that modern additions to the urban fabric include concrete, artificial stone, or low quality cladding: **"The distinctly mixed use of materials**

used throughout the Historic town centre core only further enforces the lack of physical unity between buildings and public spaces.”

- 5.12 Other late 20th century development is also acknowledged but its relatively value is not identified: **“The multi-storey car park, the council office and the retail park, although unimpressive buildings, do act as landmark buildings because of the impression they leave on the psyche of town centre users.”**

The later reference to modern buildings in the ‘Conclusion’ section suggests that these often exert negative influence, but the negative landmarks have not been specifically identified: **“The more modern buildings often dominate the streetscape but, due to their age and the poor quality of materials used, often evoke a sense of negativity and deprivation. These dominative buildings have in many instances become run down in appearance and only aid in creating a negative sense of place.”**

- 5.13 The negative influence of the nearby retail premises in the sub-area 1b ‘Retail Park’ is also recognised, albeit it is somewhat focused on the land use and retail competition rather than grain, built form or other aspects of townscape character.
- 5.14 With regard the townscape guidelines for the Character Area 1 ‘Historic Town Centre Core’, these are identified in the published *Appraisal* as: conserve and enhance, with the following specific guidelines:

- **“Conserve features of historic interest, buildings and spaces.**
- **Conserve town centre functions in the centre of town.**
- **Conserve positive views along key streets and neighbourhoods. Enhance public realm with improvements to streets and green spaces.**
- **Enhance the connectivity of major streets and nodes by improved links and signage.”**

Conservation Areas

- 5.15 Pegasus’ desktop baseline studies identified a number of Conservation Areas that may be of relevance to this TVA. These include:

- The Overcliffe Conservation Area.

- The Darnley Road Conservation Area.
- The Upper Windmill Street Conservation Area.
- The Windmill Hill Conservation Area.

5.16 The TVA aims to investigate the level of inter-visibility and ascertain whether the proposed scheme would affect views out of these areas and to what degree, and its influence on the perception of the townscape associated with these conservation areas. The inclusion of these heritage designations does not necessarily mean that effects would occur, or indeed would be negative.

Overcliffe Conservation Area

5.17 The Overcliffe *Conservation Area Appraisal* describes this area as:

"The Overcliffe Conservation Area encompasses part of the early 19th century Rosherville New Town development in Northfleet and the mid-19th century houses along Overcliffe which were developed as part of this prestigious suburb, directly to the west of Gravesend Town Centre. The fine, large houses which line the roads are a mixture of villas and terraced residences, some sited to take advantage of the views northwards towards the River Thames.

The Overcliffe villas, which were built from 1864 to 1870 along the south side of the road, look out over the steep chalk cliffs to the river Thames. Their views to the river are partially obscured by the trees that line the north side of the road, but these trees fortunately also help to hide the retail and industrial sites that now occupy the foreshore below. The built form on the south side of Overcliffe mainly consists of pairs of broad semi-detached villas built over two or three storeys on wide plots. The north side has very little built form due to 19th century excavation of the chalk cliffs. The openness of the uncluttered streetscape is accentuated by the breadth of the highway and the lack of any buildings along the north side of the road."

5.18 With regard to the immediate setting, the published *Conservation Area Appraisal* states: **"To the east: 20th century flats, an office block and commercial/retail units leading into New Road and Gravesend town centre"** (refer to Figure 2 View A and View B, and Figure 3 Viewpoint 2).

5.19 The published *Conservation Area Appraisal* does not comment on the townscape to the east or the site, being located outside of its boundaries. It does not identify any negative or positive buildings in the surrounding areas except for those within the

Conservation Area itself. It does, however, identify principal negative features outside of its boundary: **"The negative appearance of modern buildings just outside the Conservation Area, particularly the car showroom and its associated signage including the large, garish banners..."** The *Conservation Area Appraisal* does not reference Joynes House, thus it follows that this particular built form is neither positive nor negative, and inconsequential to the character of the Overcliffe Conservation Area.

- 5.20 The *Conservation Area Appraisal*, however, identifies a single positive view along Overcliffe Road / New Road looking eastwards and towards the town centre. The overwhelming proportion of the built form fronting the streets within the Conservation Area has been identified as 'positive', particularly those that date to the 19th Century or predate the Second World War. It is important to acknowledge that eastward views along Overcliffe Road / New Road towards the city centre do not include any listed buildings or 'buildings of local interest'. A single viewpoint along this road illustrates views towards the site and town centre – refer to Viewpoint 2. Figure 3.

The Darnley Road Conservation Area

- 5.21 The published *Darnley Road Conservation Area Appraisal* describes this Conservation Area as:

"The Darnley Road Conservation Area includes part of the 19th century residential expansion around the site of the Earl of Darnley's manor farm to the south of Gravesend town centre. (...) The special interest is provided by the historic layout, including remnants of the manor farm (the open green), since overlain with a 19th century urban street pattern. These streets contain small groups and terraces of high quality two- and three storey 19th century houses, many of which display elaborate architectural detailing."

- 5.22 In terms of the proposed development, it's the northern most part of the Conservation Area that is of relevance to this TVA. The Conservation Area extends along Darnley Road up to the railway line and overbridge as the Character Area 1 Darnley Road. A number of pre-1800, 19th Century and early 20th century 'buildings of local interest' are present in the northern part of this Character Area and are seen simultaneously with large grain premises outside of the Conservation Area, to the west of Darnley Road. In terms of views out, the *Conservation Area Appraisal* does not identify any views towards the site. A single positive view is orientated north

east, at which point Joynes House is considerably screened. Less restricted view towards the site is illustrated by Viewpoint 3 Figure 3.

- 5.23 Other positive views, identified in the *Conservation Area Appraisal*, are orientated away from the site and are enclosed by built form, and Joynes House is either not visible or inconsequential in visual terms.

The Upper Windmill Street Conservation Area

- 5.24 The Conservation Area is described in the published *Upper Windmill Street Conservation Area Character Appraisal* as:

"The Upper Windmill Street Conservation Area lies to the south of the historic centre of Gravesend. Windmill Street links directly through to the High Street and Town Pier in the north, and became the principal thoroughfare for visitors arriving to the town by steam boat in the 19th century and proceeding to the resort attractions on Windmill Hill. (...) The buildings which line the streets contained within the Conservation Area were principally laid out during the first half of the 19th century, many of which are to the design of a local architect or builder."

- 5.25 This Conservation Area is strongly linear and largely associated with Windmill Street, side streets, and the Civic Centre and Woodville Halls. The level topography and density of the built form generally prevents from gaining any unrestricted or medium range views out. The northern part of the Conservation Area is an exception. The Civic Centre itself is raised above the street level with the slightly elevated podium allowing for views to the north west along what is now Rathmore Road, which leads to Gravesend train station. This location, illustrated by Viewpoint 4 Figure 3, coincides with the 'positive' and 'negative' views identified in the *Upper Windmill Street Conservation Area Character Appraisal* (the map in the published *Appraisal* is not up to date and reflects the layout from around 2011, and not the current situation). The townscape, as perceived from the lower lying Rathmore Road is illustrated by View D (refer to Figure 2).

The Windmill Hill Conservation Area

- 5.26 The *Windmill Hill Conservation Area Character Appraisal* described this area as:

"The Windmill Hill Conservation Area lies to the south of the historic centre of Gravesend in Kent. The lower slopes of the hill are circuited by two of the historic arterial routes (Windmill Street and Parrock Road/Parrock Street) into the

riverside town from the London to Rochester road. These roads once crossed open fields and untilled land. (...)

The character of the Conservation Area is of a residential suburb, containing a large number of buildings of architectural and historic interest. The buildings are relatively unaltered and generally in a good state of repair. The topography has shaped the street pattern, with narrow lanes meandering up the steep slopes of the hill, and buildings arranged to take full effect of attractive views, both of Windmill Hill, and across the countryside of Kent."

- 5.27 The topographical variations across this Conservation Area are evident and quite pronounced in places and Windmill Hill acts as a strong topographical feature influencing the local townscape. Due to its elevation, views from the Hill overlook the town and travel some distance across the River Thames. This is recognised in the *Windmill Hill Conservation Area Character Appraisal* with a number of 'positive' views identified from the summit of Windmill Hill. This location has been selected as one of the TVA viewpoints – refer to Viewpoint 5, Figure 3.

Other Conservation Areas

- 5.28 The 'positive' views mapped in the *Gravesend Riverside Conservation Area Character Appraisal* are largely internal, and those that extend out towards the surrounding townscape do not include the site.
- 5.29 Similarly, the *High Street & Queen Street Conservation Area Character Appraisal* and the *King Street Conservation Area Character Appraisal* does not identify any view that would have the potential to include Joynes House or be affected by the proposed extension.
- 5.30 The *Pelham Road / The Avenue Conservation Area Character Appraisal* identifies a single 'positive' view along Pelham Road looking north east, towards the Darnley Conservation Area. Views are strongly enclosed and channelled by the built form either side, and do not include Joynes House.
- 5.31 A variety of views gained from these conservation areas and undesignated parts of the local townscape, are illustrated by Figure 2 Views F – K. Not all of the identified views include Joynes House. This TVA does not specially address them all, but rather uses them to discuss the townscape effects in the round.
- 5.32 View F is located in the Parrock Street Car Park and illustrates the undesignated urban environment east of the Civic Centre with views including the northern part of

the car park, subject to the ongoing planning application 20211540 (refer to Table 1 of this TVA). View G is located further north on the northern edge of the aforementioned car park, and near the railway overbridge at Saddington Street. View H and View J are located in the town centre, and associated Conservation Area, as one moved westward towards the site. View J and View K look south along the undesignated townscape of Bath Street with views extending towards the site.

Iterative Design

- 5.33 During the iterative design process, the Applicant sought Pegasus' input with regard the scale and massing of the proposed extension. Following the site visit and preliminary work, Pegasus suggested that the front elevation should be marginally offset from the building line to reduce the perceived height of the proposed extension and protect views from the road level.
- 5.34 Simultaneously, Pegasus suggested that the eastern elevation, addressing the junction of the A226 / New Road with Darnley Road / Bath Street, should be stepped back from the parapet to reduce any visual competition or increased sense of enclosure. This advice was based on the on-site analysis of kinetic experience gained along various routes in the town centre and visibility of the eastern end of Joynes House.
- 5.35 It was considered that the offset from the eastern elevation would help reduce the perception of the overall height and, thus in turn, maintain the existing character of the streetscene as seen from New Road, Bath Street, and Darnley Road.
- 5.36 Further design work was undertaken in August 2022, in order to scrutinize the proposed colour palette. Consequently, the previously proposed timber effect and light coloured panels were omitted and replaced by composite panels of dark recessive grey colour (slate colour or similar).

Sensitivity of receptors

- 5.37 The sensitivity of the townscape associated with the various conservation areas is considered to be medium, given their high value but low susceptibility to change.
- 5.38 Areas of undesignated townscape are taken as being of low value and low susceptibility, thus of overall low sensitivity to the proposed extension, given the complexity of the local townscape and nature of the proposed development.

- 5.39 With regard the visual receptors, road users and pedestrians are taken as being of medium sensitivity to the proposed development. The site visit and desktop analysis did not reveal any high sensitivity visual receptors, such as Public Rights of Way users, that would be of relevance to this TVA.

Effects upon local townscape and its appreciation

- 5.40 The assessment simultaneously identifies and comments on the predicted effects upon the townscape character and its appreciation – visual amenity; it does not differentiate specific visual receptors. Given the nature and typology of the proposed scheme this approach was considered appropriate and proportionate.

- 5.41 With regard the appreciation of the local townscapes, the effects on visual amenity are concerned with the changes in views arising from the proposals in relation to visual receptors that are present in the area. Visual amenity is defined in GLVIA3 as:

'...the overall pleasantness of the views people enjoy of their surroundings, which provides an attractive visual setting or backdrop for the enjoyment of activities of the people living, working, recreating, visiting or travelling through an area.'³

- 5.42 As recognised in the previous paragraphs, the townscape around the site is varied, both in architectural style, period, building height, and materials. It is complex and not uniform, reflecting the evolution of the town. Due to its height and mass Joynes House can be described as a townscape feature that aids wayfinding, and one that does not dominate the local or indeed wider townscape. The neighbouring built form is generally two to three storey height with active frontages and pitched or mansard roofs, or flat roofs hidden by low parapets. There are examples of attractive buildings such as The Wheatsheaf public house at No.62 and The Adult Education Centre at Darnley Road. Across the road, addressing the junction and Joynes House, sits a relatively modern commercial building with a gently sloping roof clad in zinc; an oval tower marks the northern edge of the building. It attracts attention and contrasts with the surrounding townscape.

- 5.43 The Gravesham Community Hospital is a relatively recent addition to the local area and creates a new feature in the townscape, and has been described as **"Due to its scale and location on a main arterial route through Gravesend, it forms a reference point within the town centre, and aids navigation."** Its

³ Glossary, Page 158, GLVIA, 3rd Edition

contemporary architecture adds another layer to the evolution of the town and is an example of assertive architecture without any reference to local vernacular. Its perimeter typology, curved elevations, use of timber cladding, and varied roof line contrasts with the surrounding area. The nearby 6 storey building of the former Gravesend & North Kent Hospital at Bath Street, is a strong negative feature, largely due to its derelict state and underused area around it. This site is subject to an approved planning application 20190504 for an 11 storey tower and up to 6 storey apartment block. This, coupled with the presence of the nearby St George Shopping Centre would reinforce the presence of large footprint and mass, and tall built form in the immediate locale.

- 5.44 The value of the local townscape, that along New Street, Bath Street and Darnely Road, and outside of the Conservation Areas, is considered to be low given its complexity and varied character. With regard to its susceptibility to the change proposed – two storey extension, it is also considered to be low as well. Overall, the sensitivity of the townscape immediately and in close proximity around the site is assessed as low.
- 5.45 Joynes House forms part of this evolving and complex, and undesignated townscape. The proposed two storey extension would not have any bearing upon the grain, typology, landform, or streetscene currently experienced in this part of Gravesham.
- 5.46 The additional two storeys would not redefine the sense of enclosure either. The degree of enclosure is partly a function of the building heights and massing in relation to the intervening space between them and takes into account the presence of vegetation. The width of New Road is sufficient enough, coupled with the lower built form around, to avoid any sense of towering or uncomfortable enclosure. The additional two storeys wouldn't change this characteristic of the local townscape, given their offsets from the northern and eastern elevation – a result of the iterative design process. The existing tree vegetation would continue to provide seasonal changes.
- 5.47 None of the existing landscape and townscape features associated with Joynes House, such as pedestrian access and perimeter walls, and indeed its elevation treatment would change. The top two storeys would utilise narrow vertical cladding in a dark recessive colour, complementary to the brick elevation of Joynes House and other contemporary interventions in Gravesend.

- 5.48 With regards to the movement, the site is privately owned and would remain closed to the public. The open space associated with Joynes House would remain in private ownership and would be accessible to its current and future users or occupiers. The proposed extension would not affect the current pedestrian or vehicular movement through the townscape.
- 5.49 Based on the above it is considered that the two storey extension would be inconsequential in townscape character terms, and would bring about negligible magnitude of change. The contemporary approach to the roofline, materials and colours would be attractive and can be described as bringing some positive change, but due to the very modest scale of the proposal it would have inconsequential negligible neutral effects upon the townscape of New Road, Bath Street, and Darnley Road.

Gravesend's Skyline

- 5.50 In order to understand the overall character of Gravesend's townscape and how its complexity is experienced from outside of its urban environment it has been considered prudent to include a view from Tilbury Fort, refer to Figure 3 **Viewpoint 1**. This location illustrates views gained from the northern shores of the River Thames, with Tilbury Fort owned and managed by English Heritage.
- 5.51 Views are strongly influenced by Tilbury Fort itself but also the complexity of the local riverscape and varied land use: cruise terminal, large scale car parking and large scale industrial sheds in close proximity. Views south include the urban environment of Gravesend with its northern edge marked by a number of apartment blocks of 5 – 6 storeys in height. The former Gravesend & North Kent Hospital at Bath Street can be identified in the view along with Joynes House. The steeple of St. George's Church punctuates the skyline with Gravesend Pier forming an attractive feature on the shore. The large scale rectangular building, occupied in part by Primark and located in the town centre, forms a detracting feature due to its bulk and apparatus on the rooftop. The St. John the Evangelist Church and the Gravesend Methodist Church are visible further to the left. The slab of Chantry Court encloses the panorama with the Sikh temple Siri Guru Nanak Darbar Gurdwara visible next to it.
- 5.52 It is important to acknowledge that the former Gravesend & North Kent Hospital at Bath Street is subject to the approved planning application 20190504, which includes

an 11 storey tower and up to 6 storey apartment block. In addition, there are other approved large scale developments that will affect Gravesend's skyline, particularly its western parts that form direct context to Joynes House: the Heritage Quarter Land Between West Street, Bath Street, Royal Pier Road and Queen Street, development up to +34.00m AOD (planning application 20120931) and the development at Clifton Slipways West Street for a 23 storey and 12 storey towers (planning application 20191122). In other words, these approved schemes will directly affect the appreciation of the townscape of Gravesend.

- 5.53 In comparison, the proposed extension to Joynes House will be inconsequential in visual terms and negligible neutral, when judged against the existing and predicted complexity of the townscape.

Effects upon Conservation Areas and Designated Townscape

- 5.54 With the proposed development being located outside of the identified Conservation Areas in Gravesend, it transpires that any potential townscape character effects would relate to the perpetual and experiential qualities, in this case views and perception of the designated townscape.
- 5.55 As described in the preceding paragraphs there are very limited opportunities to gain views of Joynes House from the surrounding Conservation Areas. A number of 'positive' views, identified in the analysed Conservation Area Character Appraisals have been reviewed and informed the viewpoint selection included in this TVA and illustrated in Figure 3 Context Baseline Views.
- 5.56 **Viewpoint 2** aims to illustrate the 'positive' view along Overcliffe / New Road identified in the *Overcliffe Conservation Area Character Appraisal*. The view is characterised by the fine grain early 19th century villas that address the main road. Views north, overlooking the industrial area along the northern shores, are screened or partially filtered by roadside vegetation: **"Their views to the river are partially obscured by the trees that line the north side of the road, but these trees fortunately also help to hide the retail and industrial sites that now occupy the foreshore below."** Movement is frequent and noise is audible.
- 5.57 At Viewpoint 2, Joynes House is identifiable but does not form a feature or element that would attract particular attention. Three storey red brick apartment blocks, located along St. James's Street partially screen its lower parts with the two upper floors appearing behind and lower than the five storey Pioneer Court, a contemporary

interpretation of the nearby 19th century villas. Whilst the published *Conservation Area Appraisal* identifies that **"To the east: 20th century flats, an office block and commercial/retail units leading into New Road and Gravesend town centre"** form its immediate setting, the document does not identify this built form as neither negative nor neutral.

- 5.58 The increase in height would be noticeable but would not detract from the streetscene associated with this designated townscape, its finer grain or architectural detailing that characterises the front elevations of the 19th century villas. Joynes House forms the background to the view where the townscape is more complex and varied. The restrained detailing and palette of materials and colours would render the two storey extension to be subservient to the overall streetscene and visually recessive. The northern front elevation would be substantially foreshortened, due to the direction of view and alignment of the road, thus the combination of solids and voids would appear considerably simplified and unlikely to be easily appreciated. The modest offset from the existing building line would assist in reducing its perceived height thus avoiding any undue visual competition. The western elevation of the extension would not include any windows, reducing clutter, and would be relieved by the external staircase extending upwards directly from the edge of the building, visually anchoring the scheme.
- 5.59 With regard to the southern and south western part of the Conservation Area, for example views from St. James's Road (refer to Figure 2 View A) the proposed extension would be either not visible at all or substantially screened by the built form within the Conservation Area.
- 5.60 In summary, the proposed two storey extension would be inconsequential in terms of the overall character of the Overcliffe Conservation Area and its appreciation. At Viewpoint 2, the introduced extension would not alter the complexity or appreciation of the streetscene and would be negligible neutral in visual terms (assuming medium sensitivity visual receptors) and negligible neutral in townscape character terms.
- 5.61 In views from **Viewpoint 3** the appreciation of the Darnley Road Conservation Area is somewhat altered by the industrial uses along the road, which are visible in very close proximity to the left of the view. This viewpoint aims to replicate the 'positive' view identified in the Conservation Area Appraisal whilst capturing views of Joynes House. The 'positive' view is orientated to the north east towards the town centre and includes a number of 19th century town houses, identified as 'positive buildings'

and also 'buildings of local interest'. In these views Joynes House is seen on the periphery of the overall panorama being considerably screened by the intervening two storey built form along Darnley Road.

- 5.62 The two storey extension would be noticeable due to its mass and different materials but would not break the roofscape formed by the buildings in the foreground. The simple roofline of the proposed extension would not attract attention, echoing the existing simple and linear character of Joynes House. In addition, the proposed dark colours would help to create a recessive element that would appear simple and not create any visual competition with the built form in the foreground, in terms of scale or colours. The appreciation of the overall streetscene would not be changed to any perceptible degree, and the character of the Darnley Road Conservation Area would remain unchanged with effects considered to be negligible neutral. In visual terms, travelling receptors may identify the proposed extension as a new element in the view but one that is modern, attractive and complimenting the local townscape. As a precautionary approach, however, the magnitude of change upon the local visual receptors is also considered to be negligible neutral with effects negligible neutral.
- 5.63 With regard the Upper Windmill Street Conservation Area and views from the Civic Centre, **Viewpoint 4** illustrates its character and presence of large scale and large mass developments that mark the town centre. The townscape is a combination of early and late 19th century townhouses, identified as 'positive buildings' and late 20th century civic development. Late 20th century large scale built form of the multi storey car park forms the backcloth to this designated townscape. Views from the front of the Civic Centre are both identified as 'positive' and 'negative'. The published Conservation Area Character Appraisal lists a number of principal positive views with **"Views across the Civic Centre forecourt and Woodville Gardens to the buildings on Stone Street and the northern end of Windmill Street"** being one of them. Viewpoint 4 is orientated to the north west and towards the Gravesend train station, and aims to replicate this 'positive' view.
- 5.64 Views towards Joynes House include the movement along Rathmore Road, the Gravesend train station building, the previously mentioned multi storey car park at Clive Road, and a large scale wind turbine located in the Port of Tilbury located on the Lower Thames. The view is relatively complex, with the foreground defined by the relatively coherent built form of the conservation area, and the background including varied typology, large scale and mass features. Joynes House reads as

being part of this more distant complex townscape, physically and visually segregated from the Upper Windmill Street Conservation Area and the Civic Centre.

- 5.65 The introduced extension would be recognisable, due to the relatively open nature of views, in this particular direction. The appreciation of the designated townscape, however, would not be altered to any perceptible degree given the distance and robustness of the townscape around the Civic Centre. The focus is largely on the immediate setting with the views across the Woodville Gardens and appreciation of the terrace houses on Stone Street not affected. Notwithstanding the medium sensitivity of the townscape of the Upper Windmill Street Conservation Area, the effects are considered to be inconsequential and negligible neutral. Similarly, the visual effects upon the receptors present at this location would be negligible neutral given the complexity of the view and nature of the introduced change.
- 5.66 **Viewpoint 5** is located within the Windmill Hill Conservation Area. It aims to illustrate one of the 'positive' views identified in the Conservation Area Appraisal located within the elevated open public space with Windmill Hill. Despite the elevated location, parts of the low lying townscape are screened by mature trees that mark the lower slopes and the neighbouring Upper Windmill Street Conservation Area is largely obscured. Views, however, include the town centre, Joynes House, and the tower blocks of Gravesham Court. The industrial development within the Port of Tilbury, large scale ferry, associated infrastructure, wind turbines, and large scale sheds form the middle ground, with the built environment of Chafford Hundred and Chadwell St Mary evident in the far distance.
- 5.67 In this view, the eye is drawn across the low lying townscape of Gravesend and towards the River Thames and distant landscape. Joynes House is identifiable but forms a minor element in the composite view, reads as being part of Gravesend complex townscape, and does not draw any attention. The proposed extension would be perceptible in this view but could be easily missed by a casual observer, given the distance, complexity of the view and difference in elevation. The additional two storeys would not break the skyline and would be seen against the linear large scale sheds located along the northern shores of the River Thames.
- 5.68 It is also important to note that the view currently experienced from Windmill Hill is going to change. The approved scheme at the Former Gravesend & North Kent Hospital (M Block) Bath Street Gravesend Kent (planning application number 20190504) and development at the Clifton Slipways West Street (planning

application number 20191122), once constructed, will form a relatively strong and vertical features in this view, deflecting attention from Joynes House. All those elements act to mitigate the introduced change; the townscape character and visual affects are considered to be negligible neutral.

6. SUMMARY AND CONCLUSIONS

Summary

- 6.1 This Townscape and Visual Appraisal (TVA) has been prepared on behalf of Joynes House Development Limited (the Applicant) in support of a Prior Approval application for the construction of two additional storeys of residential apartments to the existing five storey commercial building known as Joynes House. The scope of work for this TVA has been guided by Paragraph B of Part 20 of the General Permitted Development Order 2015 (GDPO), which sets out Class AA Prior Approval procedures, relevant to this planning application.
- 6.2 In this regard, the purpose of this TVA has been to provide an assessment relating to the external appearance of the building and how any potential effects (if any) may be mitigated. This has been further explained in the Planning Statement prepared by Gemini Planning.
- 6.3 The site is currently occupied by a five storey Joynes House with pedestrian access from the A226 / New Road to the north and from St. James's Road to the south, via a car park that forms part of the site. This TVA has considered effects on the townscape character of Gravesend and its appreciation, both the undesignated townscape and designated conservation areas. The assessment has been conducted in situ, as part of site survey, and has been supported by a set of five viewpoints.
- 6.4 The assessment of massing and scale has concluded that the proposed extension to Joynes House would be in context with the existing property and wider commercial and large scale buildings in the vicinity. The movement and grain, and overall townscape of the immediate area would remain largely unchanged, and any effects would be inconsequential, and negligible neutral. Similarly, the assessment of the surrounding conservation areas, their townscape character and appreciation, has concluded that these designated areas would be subject to inconsequential and negligible neutral effects.

Conclusions

- 6.5 On balance, taking into account the existing townscape context and its character, and very modest changes proposed to Joynes House, the proposed scheme has the ability to be absorbed into the local townscape without any adverse townscape character or visual effects.

APPENDIX 1: METHODOLOGY

Gravesend Borough Council

1. TOWNSCAPE AND VISUAL APPRAISAL (TVA) METHODOLOGY

- 1.1 This Townscape and Visual Appraisal (TVA) has been undertaken with reference to best practice, as outlined in the following published guidance:
- *Guidelines for Landscape and Visual Impact Assessment* (3rd Edition, 2013) - Landscape Institute / Institute of Environmental Management and Assessment.
 - GLVIA3 Statements of Clarification.
 - *An Approach to Landscape Character Assessment* (2014) - Natural England.
 - *An approach to landscape sensitivity assessment – to inform spatial planning and land management*, June 2019.
 - *Advice Note 4: Tall Buildings* (2015) Historic England.
- 1.2 The Landscape Institute adopted its new guidance on photography and visualisation: the *Visual Representation of Development Proposals*, Technical Guidance Note 06/19, 17 September 2019. Pegasus' TVA will follow the new guidance with all viewpoints illustrated as the so-called Type 1 photographic evidence.
- 1.3 The *Guidelines for Landscape and Visual Impact Assessment (GLVIA3)* states in paragraph 2.7 that 'townscape' refers to areas where built form is dominant, and in particular that **"townscape means the landscape within the built-up area, including the buildings, the relationship between them, the different types of urban open spaces, including green spaces, and the relationship between buildings and open spaces."**¹ In reading GLVIA3 in relation to townscape assessment, references to, and usage of the term 'landscape' are synonymous with the term 'townscape'.
- 1.4 GLVIA3 states within paragraph 1.1 that **"Landscape and Visual Impact Assessment (LVIA) is a tool used to identify and assess the significance of and the effects of change resulting from development on both the landscape as an environmental resource in its own right and on people's views and visual amenity."**²
- 1.5 GLVIA3 also states within paragraph 1.17 that when identifying townscape and visual effects there is a **"need for an approach that is in proportion to the scale of the project that is being assessed and the nature of the likely**

¹ Paragraph 2.7, Page 16, GLVIA, 3rd Edition

² Paragraph 1.1, Page 4, GLVIA, 3rd Edition

effects. Judgement needs to be exercised at all stages in terms of the scale of investigation that is appropriate and proportional.”³

1.6 GLVIA3 recognises within paragraph 2.23 that **“professional judgement is a very important part of LVIA. While there is some scope for quantitative measurement of some relatively objective matters much of the assessment must rely on qualitative judgements”⁴** undertaken by a landscape consultant or a Chartered Member of the Landscape Institute (CMLI).

1.7 The effects on cultural heritage and ecology are not considered within this TVA.

Effects Assessed

1.8 Townscape and visual effects are assessed through professional judgements on the sensitivity of townscape character, visual receptors and representative viewpoints combined with the predicted magnitude of change arising from the development.

1.9 Sensitivity is defined in GLVIA3 as **“a term applied to specific receptors, combining judgments of susceptibility of the receptor to a specific type of change or development proposed and the value related to that receptor.”⁵** Various factors in relation to the value and susceptibility of townscape character, visual receptors or representative viewpoints are considered below and are cross referenced to determine the overall sensitivity as shown in Table 1:

Table 1, Overall sensitivity of townscape and visual receptors				
	Value			
Susceptibility		High	Medium	Low
	High	High	High	Medium
	Medium	High	Medium	Medium
	Low	Medium	Medium	Low

1.10 Magnitude of change is defined in GLVIA3 as **“a term that combines judgements about the size and scale of the effect, the extent over which it occurs,**

³ Paragraph 1.17, Page 9, GLVIA, 3rd Edition

⁴ Para 2.23, Page 21, GLVIA, 3rd Edition

⁵ Glossary, Page 158, GLVIA, 3rd Edition

whether it is reversible or irreversible and whether it is short or long term in duration.”⁶ Various factors contribute to the magnitude of change on townscape character, visual receptors and representative viewpoints.

- 1.11 The sensitivity of the townscape and visual receptor and the magnitude of change arising from the proposals are cross referenced in Table 8 to determine the overall degree of effects.

2. EFFECTS ON TOWNSCAPE ELEMENTS

- 2.1 Professional judgement has been used to determine the magnitude of change on individual landscape elements within the site as shown in Table 2:

Table 2, Criteria for assessing magnitude of change for landscape elements	
HIGH	Total loss/gain of a landscape element.
MEDIUM	Partial loss/gain or alteration to part of a landscape element.
LOW	Minor loss/gain or alteration to part of a landscape element.
NEGLIGIBLE	No loss/gain or very limited alteration to part of a landscape element.

3. EFFECTS ON TOWNSCAPE CHARACTER

- 3.1 Townscape character is defined as the **“distinct, recognisable and consistent pattern of elements in the landscape that makes one landscape different from another, rather than better or worse.”**⁷ The assessment of effects on townscape character considers how the introduction of new elements physically alters the landform, landcover, townscape pattern and perceptual attributes of the site or how visibility of the proposals changes the way in which the townscape character is perceived.

Sensitivity of Townscape Character

- 3.2 Sensitivity is determined by a combination of the value that is attached to a townscape element and the susceptibility of the townscape element to changes that

⁶ Glossary, Page 158, GLVIA, 3rd Edition

⁷ Glossary, Page 157, GLVIA, 3rd Edition

would arise as a result of the proposals – see pages 88-90 of GLVIA3. Both value and susceptibility are assessed on a scale of high, medium or low.

3.3 The criteria for assessing the value of townscape character is shown in Table 3:

Table 3, Criteria for assessing the value of townscape character	
High	Designated landscape/townscape including but not limited to World Heritage Sites considered to be an important component of the country's character experienced by a high number of people. Townscape condition is good and components are generally maintained to a high standard. In terms of seclusion, enclosure by land use, traffic and movement, light pollution and presence/absence of major infrastructure, the townscape has an elevated level of tranquillity. Rare or distinctive townscape elements and features are key components that contribute to the townscape character of the area.
Medium	Undesignated landscape/townscape including urban areas, open spaces and urban fringe considered to be a distinctive component of the national or local landscape/townscape character. Townscape condition is fair and components are generally well maintained. In terms of seclusion, enclosure by land use, traffic and movement, light pollution and presence/absence of major infrastructure, the landscape/townscape has a moderate level of tranquillity. Rare or distinctive landscape/townscape elements and features are notable components that contribute to the character of the area.
Low	Undesignated landscape/townscape including urban areas, open spaces and urban fringe considered to be of unremarkable character. Landscape/townscape condition may be poor and components poorly maintained or damaged. In terms of seclusion, enclosure by land use, traffic and movement, light pollution and presence/absence of major

	infrastructure, the landscape/townscape has limited levels of tranquillity. Rare or distinctive elements and features are not notable components that contribute to the landscape/townscape character of the area.
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3.4 The criteria for assessing the susceptibility of townscape character is shown in Table 4:

Table 4, Criteria for assessing townscape susceptibility	
High	Scale of enclosure – townscapes with a low capacity to accommodate the type of development being proposed owing to the interactions of topography, vegetation cover, built form, etc. Nature of land use – townscapes with no or little existing reference or context to the type of development being proposed. Nature of existing elements – townscapes with components that are not easily replaced or substituted (e.g. ancient woodland, mature trees, historic parkland, etc). Nature of existing features – townscapes where detracting features, major infrastructure or industry is not present or where present has a limited influence on townscape character.
Medium	Scale of enclosure – townscapes with a medium capacity to accommodate the type of development being proposed owing to the interactions of topography, vegetation cover, built form, etc. Nature of land use – townscapes with some existing reference or context to the type of development being proposed. Nature of existing elements – townscapes with components that are easily replaced or substituted. Nature of existing features – townscapes where detracting features, major infrastructure or industry is present and has a noticeable influence on townscape character.
Low	Scale of enclosure – townscapes with a high capacity to accommodate the type of development being proposed owing to the interactions of topography, vegetation cover, built form, etc. Nature of land use – townscapes with extensive existing reference or context to the type of development being proposed.

	Nature of existing features – townscapes where detracting features or major infrastructure is present and has a dominating influence on the townscape.
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- 3.5 Various factors in relation to the value and susceptibility of townscape character are assessed and cross referenced to determine the overall sensitivity as shown in Table 1.

Magnitude of Change on Townscape Character

- 3.6 Professional judgement has been used to determine the magnitude of change on townscape character as shown in Table 5:

Table 5, Criteria for assessing magnitude of change on townscape character	
High	Introduction of major new elements into the townscape or some major change to the scale, landform, landcover or pattern of the townscape.
Medium	Introduction of some notable new elements into the townscape or some notable change to the scale, landform, landcover or pattern of the townscape.
Low	Introduction of minor new elements into the townscape or some minor change to the scale, landform, landcover or pattern of the townscape.
Negligible	No notable or appreciable introduction of new elements into the townscape or change to the scale, landform, landcover or pattern of the townscape.

4. EFFECTS ON VISUAL AMENITY

- 4.1 The effect on visual amenity considers the changes in views arising from the proposals in relation to visual receptors including settlements, residential properties, transport routes, recreational facilities and attractions; and representative viewpoints or specific locations within the study area.

Sensitivity of Visual Receptors

- 4.2 Sensitivity is determined by a combination of the value that is attached to a view and the susceptibility of the visual receptor to changes in that view that would arise

as a result of the proposals – see pages 113-114 of GLVIA3. Both value and susceptibility are assessed on a scale of high, medium or low.

4.3 The criteria for assessing the value of views are shown in Table 6:

Table 6, Criteria for assessing the value of views	
High	Views with high scenic value within designated landscapes/townscapes including but not limited to World Heritage Sites, National Parks, Areas of Outstanding Natural Beauty, etc. Likely to include key viewpoints on OS maps or reference within guidebooks, provision of facilities, presence of interpretation boards, etc.
Medium	Views with moderate scenic value within undesignated landscape/townscape including urban fringe and rural countryside.
Low	Views with unremarkable scenic value within undesignated landscape/townscape with partly degraded visual quality and detractors.

4.4 The criteria for assessing the susceptibility of views are shown in Table 7:

Table 7, Criteria for assessing visual susceptibility	
High	Includes occupiers of residential properties and people engaged in recreational activities in the countryside using public rights of way (PROW).
Medium	Includes people engaged in outdoor sporting activities and people travelling through the townscape on minor roads and trains.
Low	Includes people at places of work e.g. industrial and commercial premises and people travelling through the townscape on major roads and motorways.

Magnitude of Change on Visual Receptors

- 4.5 Professional judgement has been used to determine the magnitude change on visual receptors as shown in Table 8:

Table 8, Criteria for assessing magnitude of change for visual receptors	
High	Major change in the view that has a defining influence on the overall view with many visual receptors affected.
Medium	Some change in the view that is clearly visible and forms an important but not defining element in the view.
Low	Some change in the view that is appreciable with few visual receptors affected.
Negligible	No notable change in the view.

5. DEGREE OF TOWNSCAPE AND VISUAL EFFECTS

- 5.1 The degree of effects are professional judgements based upon all the factors in terms of townscape and visual sensitivity and the magnitude of change arising from the proposals. The cross referencing of townscape and visual sensitivity and the magnitude of change determines the overall degree of effects as shown in Table 9:

Table 9, Degree of townscape and visual effects					
		Sensitivity			
		High	Medium	Low	Negligible
Magnitude of Change	High	Major	Major	Moderate	Negligible
	Medium	Major	Moderate	Minor	Negligible
	Low	Moderate	Minor	Minor	Negligible
	Negligible	Negligible	Negligible	Negligible	Negligible

6. NATURE OF EFFECTS

- 6.1 GLVIA3 includes an entry that states **“effects can be described as positive or negative (or in some cases neutral) in their consequences for views and visual amenity.”**⁸ GLVIA3 does not, however, state how negative or positive effects should be assessed and therefore becomes a matter of subjective judgement rather than reasoned criteria. Due to inconsistencies with the assessment of negative or positive effects a precautionary approach is applied to this TVA that assumes all townscape and visual effects are considered to be negative or adverse unless otherwise stated.

⁸ Para 6.29, Page 113, GLVIA, 3rd Edition

FIGURE 1: SITE AND VIEWPOINT LOCATION PLAN

Gravesend Borough Council



KEY



Site Location



Viewpoint Location

Revisions:
First Issue- 07/04/2022 AJH

Viewpoint Location Plan

Joynes House, Gravesend

Client: Joynes House Development Ltd.
DRWG No: **P22-0541_EN_004** - REV: -
Drawn by: AJH Approved by: RCH
Date: 07/04/2022
Scale: 1:7,500 @ A3



FIGURE 2: TOWNSCAPE CHARACTER

Gravesend Borough Council



VIEW A



VIEW B



VIEW C



VIEW D



VIEW E



VIEW F



VIEW G



VIEW H



VIEW I



VIEW J



VIEW K

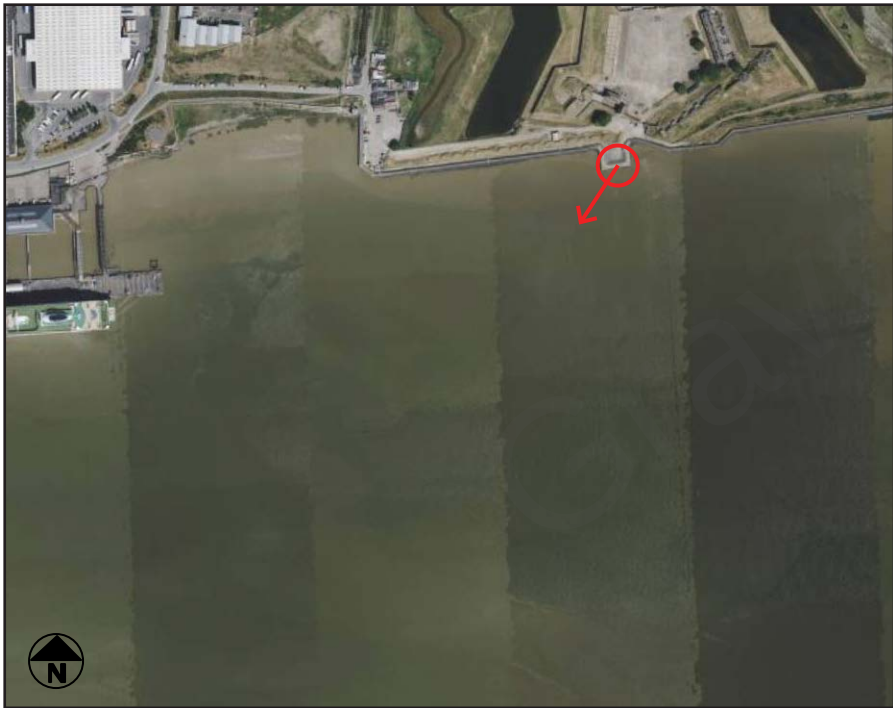
FIGURE 3: CONTEXT BASELINE VIEWS

Gravesend Borough Council



CONTEXT BASELINE VIEWPOINT 1

Looking south from Tilbury Fort.



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Camera make & model	- Canon EOS 5D, FFS	Viewpoint height [AOD]	- 0m
Date & time of photograph	- 21/03/2022 @ 10:45	Distance from site	- 1230m
OS grid reference	- 565052, 175198		



CONTEXT BASELINE VIEWPOINT 2

Overcliffe Conservation Area, Overcliffe road, looking east.



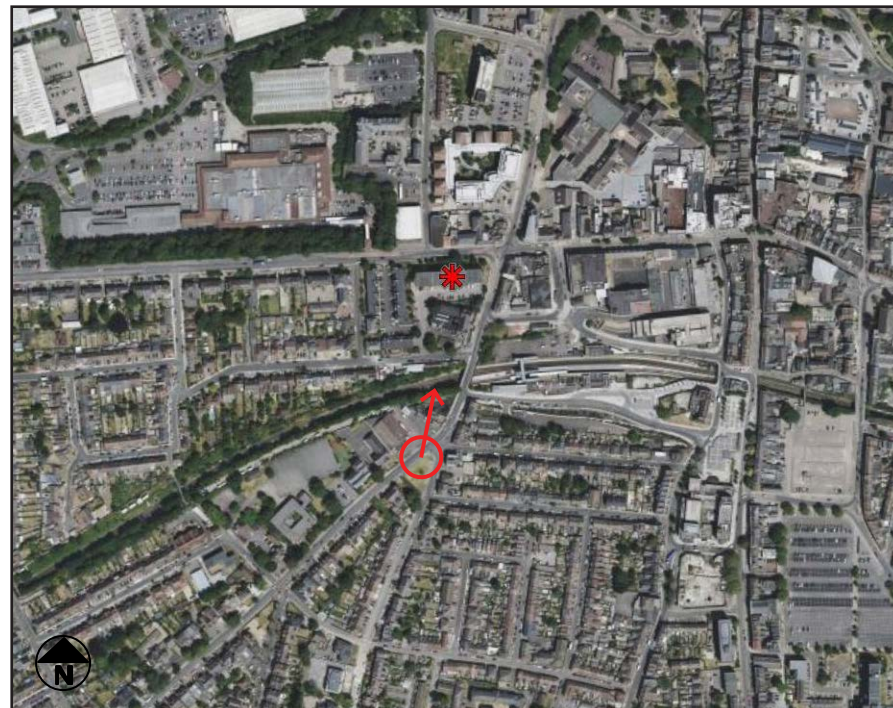
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Camera make & model	- Canon EOS 5D, FFS	Viewpoint height (AOD)	- 20m
Date & time of photograph	- 21/03/2022 @ 10:45	Distance from site	- 300m
OS grid reference	- 564150, 174135		



CONTEXT BASELINE VIEWPOINT 3

Darnley Road Conservation Area, Pelham Road looking north east.



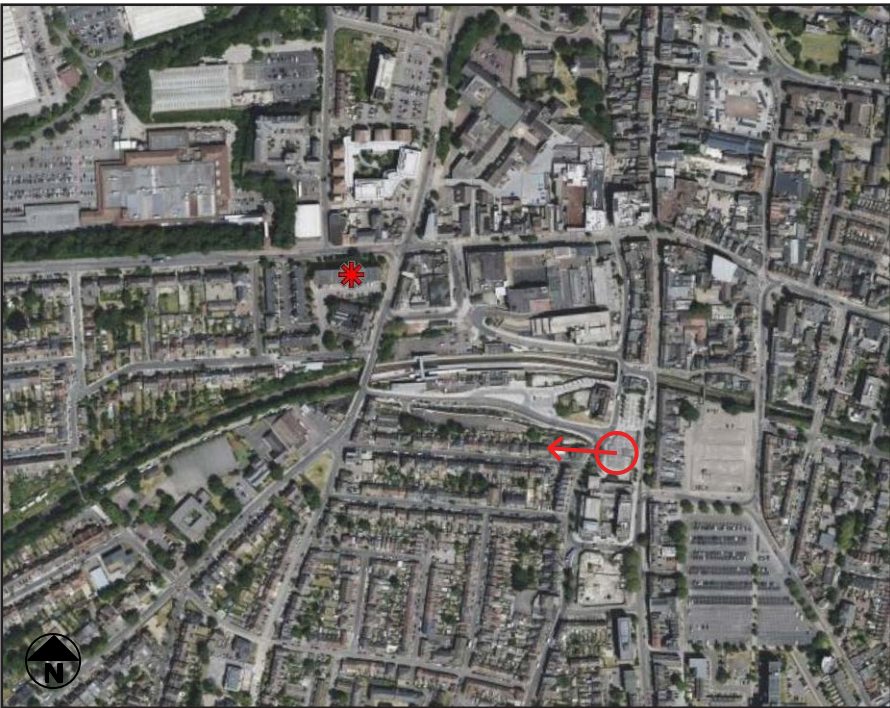
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Camera make & model	- Canon EOS 5D, FFS	Viewpoint height [AOD]	- 20m
Date & time of photograph	- 21/03/2022 @ 10:45	Distance from site	- 190m
OS grid reference	- 564410, 173932		



CONTEXT BASELINE VIEWPOINT 4A

Upper Windmill Street Conservation Area, Gravesham Civic Centre, looking north west.



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Camera make & model	- Canon EOS 5D, FFS	Viewpoint height (AOD)	- 20m
Date & time of photograph	- 21/03/2022 @ 10:45	Distance from site	- 300m
OS grid reference	- 564716, 173933		



CONTEXT BASELINE VIEWPOINT 4B

Upper Windmill Street Conservation Area, Gravesham Civic Centre, looking north west.



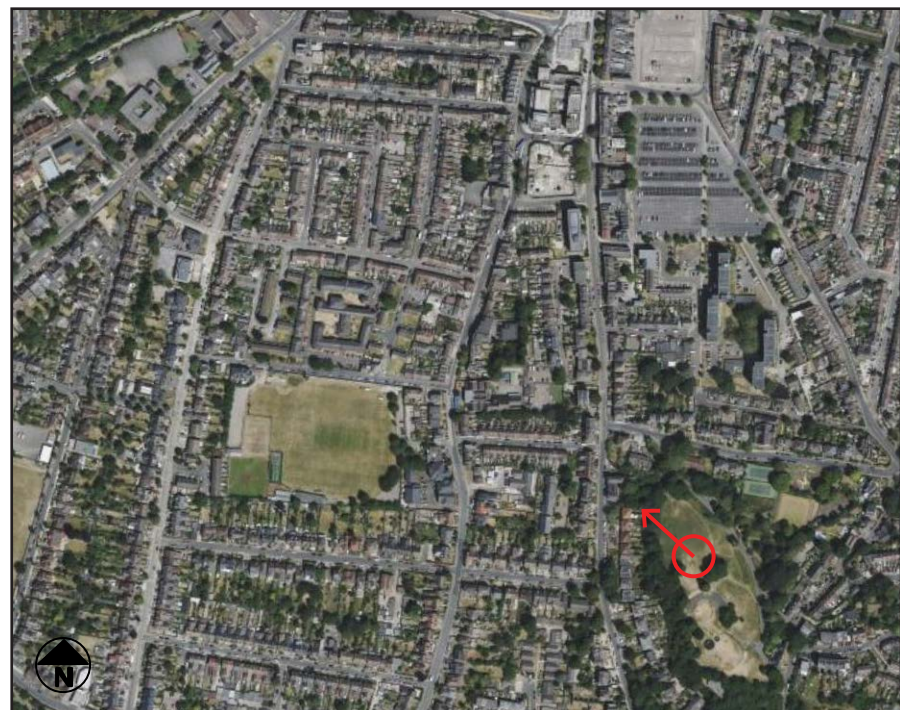
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Camera make & model	- Canon EOS 5D, FFS	Viewpoint height (AOD)	- 20m
Date & time of photograph	- 21/03/2022 @ 10:45	Distance from site	- 300m
OS grid reference	- 564716, 173933		



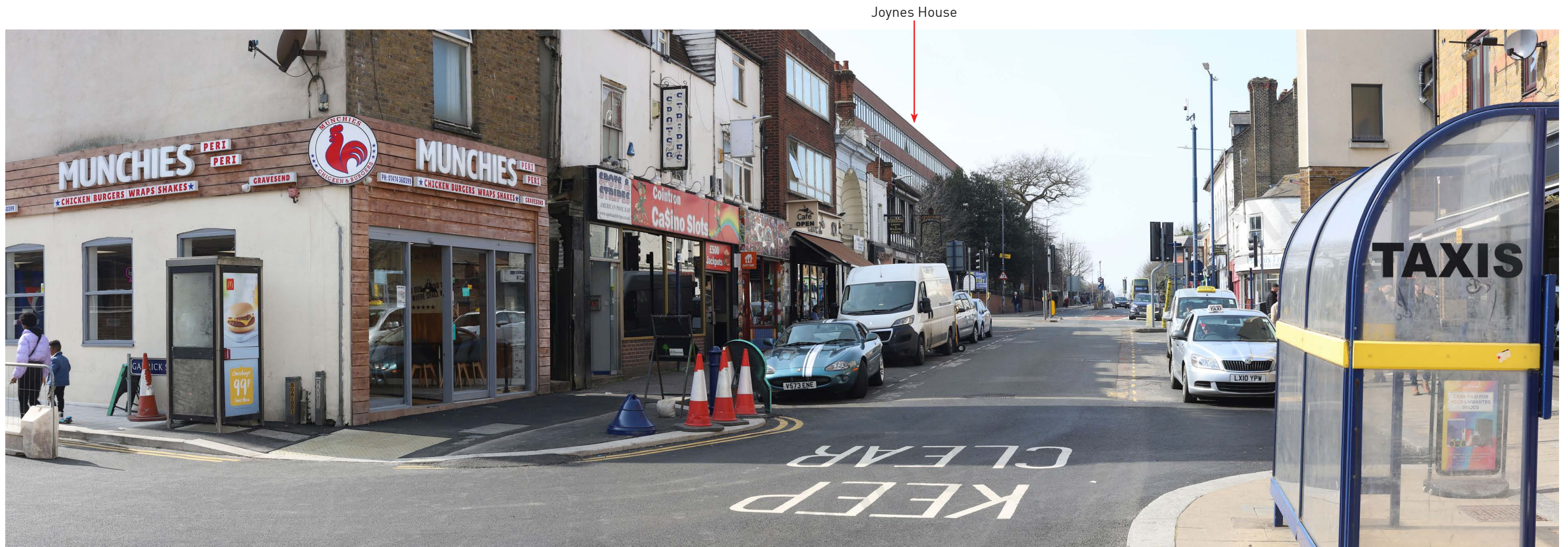
CONTEXT BASELINE VIEWPOINT 5

Windmill Hill Conservation Area, Windmill Hill, looking north west.



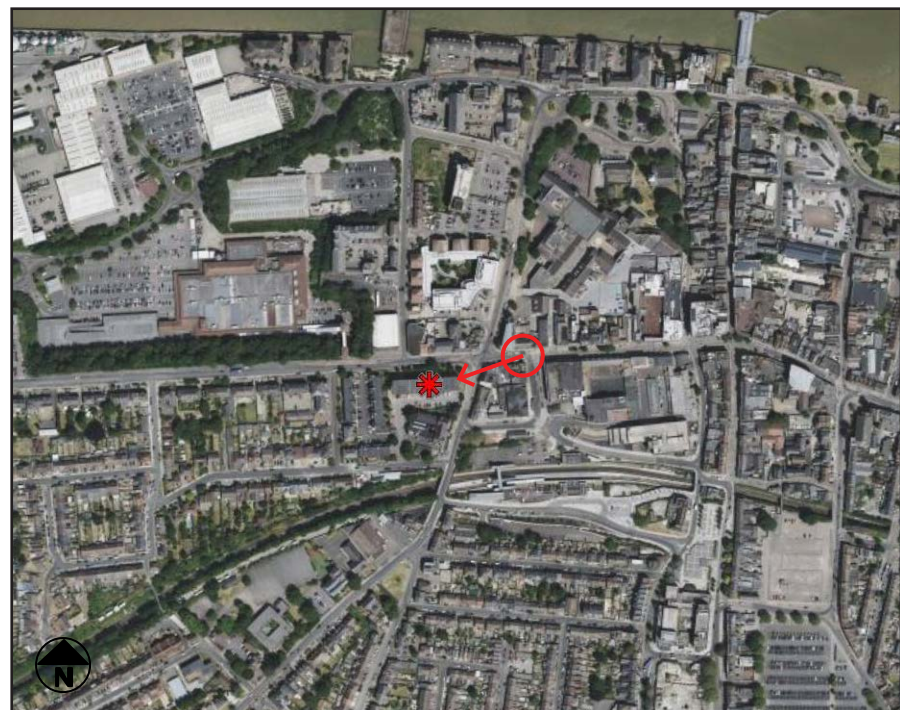
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Camera make & model	- Canon EOS 5D, FFS	Viewpoint height (AOD)	- 52m
Date & time of photograph	- 21/03/2022 @ 10:45	Distance from site	- 830m
OS grid reference	- 564855, 173397		



CONTEXT BASELINE VIEWPOINT 6

New Road, town centre, looking west.



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Camera make & model	- Canon EOS 5D, FFS	Viewpoint height [AOD]	- 16m
Date & time of photograph	- 21/03/2022 @ 10:45	Distance from site	- 100m
OS grid reference	- 564548, 174154		