

Northfleet Harbourside

Environmental Statement Volume 2
Townscape and Visual Impact Assessment



Northfleet
Harbourside



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NORTHFLEET HARBOURSIDE

SEPTEMBER 2022



Gravesham Borough Council

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NON-TECHNICAL / EXECUTIVE SUMMARY

This report provides an assessment of the impact of the Proposed Development upon townscape and visual receptors at Northfleet Harbourside. The assessment has been carried out in accordance with the Guidelines for Landscape and Visual Impact Assessment, Third Edition (Landscape Institute and Institute of Environmental Management and Assessment, 2013).

The assessment and design development has been informed by accurate visual representations (aka verified views) prepared by visualisation consultants, Eb7. The location of the viewpoints has been agreed with officers at Gravesham Borough Council during the pre-application process. Their selection was informed by architectural and historic accounts of the area, an appraisal of the existing site and surroundings, and planning policy.

Further visual material has also been prepared following consultation feedback. This includes, but is not limited to, the preparation of additional accurate visual representations, non-verified massing studies and a zone of theoretical visibility.

POLICY DESIGNATIONS

Policy designations outline the strategic aspirations for an area, contribute to the understanding of its function and the potential for, or even lack of, change.

The aspirations to regenerate the wider area around the site are set out in the development plan. It is a key strategic objective (SO1) of the Core Strategy to concentrate "development on underused, derelict and previously developed land in the urban area of Gravesend and Northfleet, in particular former industrial sites along the Thames Riverside and in Gravesend town centre". The Core Strategy identifies a need for more housing, given the housing shortage and growing population. Significant change with the creation of new neighbourhoods along the riverfront is expected. This would entail the transition from predominantly heavy riverside industry to diverse range mix of uses and new, sustainable communities. The new communities will complement the existing residential areas, helping improve public transport and developing new job opportunities.

The site itself falls within the Northfleet Embankment and Swanscombe Peninsula East Opportunity Area (SPEOA), identified in the Core Strategy as one of four opportunity areas in Gravesham. The SPEOA comprises several sub-areas. The site covers the western part of sub-area 1.2 and contains sub-area 1.3 entirely. The Core Strategy states that "*it is anticipated that this area will remain in active employment uses over the plan period. The retention and expansion of industrial and port related employment in this area will be supported*". Sub-area 1.3 is deemed to have regeneration potential, provided potential contamination issues are addressed and the industrial legacy protected. Existing uses, such as the football ground, need to be integrated into new use concepts.

The planning policy context for Northfleet is underpinned by its good public transport links, both to Gravesend town centre and London via the Southeastern railway network, including the high-speed connections to St Pancras and Ashford. This provision supports intensification of land uses, including high density residential development.

Consequently, there is an aspiration for high density development within the site and which is supported by the development plan. On that basis, the character and appearance of the site will change.

TOWNSCAPE AND VISUAL

TOWNSCAPE

The townscape assessment has considered the Proposed Development within its urban context, including the buildings, the relationships between them, the different types of urban open spaces, including green spaces and the relationship between buildings and open spaces.

The site falls in the Gravesend and Northfleet urban area which is the main location for housing and employment in the borough. Over the last 100 years, the area has undergone major changes. Rural marshland until the late 19th century, Northfleet became a centre of the British cement industry. Cement plants and quarries occupied much of the land along the river. Many of these industries have now disappeared, leaving large swathes of brownfield land behind. Environmental issues, such as ground pollution, dust and air quality are being addressed.

The townscape is extremely varied. Industrial estates and large footprint sheds sit between pockets of housing, traditional early 20th century terraces and post-war blocks of flats. Several sites have been earmarked for redevelopment, for example Harbour Village by Bellway Homes to the east of the site.

There are also substantial pieces of green land, often former quarries or other replanted industrial sites. The high-speed railway tracks to Ebbsfleet, Ashford and the Eurotunnel are cut through the landscape. High voltage power lines run across the study area.

The assessment has identified 7 townscape character areas within a 1 km radius from the centre of the site. The townscape value of the receptors ranges from Very Low – with often very poor quality and fragmented townscape – to Medium – such as the green space to the north of the site that forms part of Swanscombe Marshes and Botany Marshes nature reserves.

The site is located in Townscape Character Area 1. The area includes the Ebbsfleet FC and a mixed commercial estate, including the main arterial route through the site, Stonebridge Road.

During the demolition and construction phase the nearby pockets of housing estates to the south and west of the site (townscape character areas 2 and 3) would experience a Minor Adverse effect. The duration of the construction period would be relatively long, although is temporary and reversible (leading to the Proposed Development) which reduces the overall magnitude of impact. The residential areas would also benefit from the phased approach to construction which would reduce the intensity of construction traffic and disturbance.

The impact of the Proposed Development upon the remaining townscape character areas during this demolition and construction phase would give rise to a Negligible to Minor Adverse effect. These effects would not be significant, and would be indirect, temporary and short- to medium-term in duration.

The operational phase seeks the comprehensive redevelopment of the site for a mixed-use high-density development. Townscape character area 1 has a Low sensitivity by virtue of the existing poor townscape quality and Low susceptibility to change. The magnitude of impact to the area would necessarily be High through its comprehensive redevelopment and the effect would be Moderate Beneficial. These effects would be significant, direct, permanent and long-term.

For the remaining townscape character areas outside of the site the Proposed Development would give rise to effects ranging between Minor Beneficial to Moderate Beneficial. These effects would be direct, permanent and long-term. The Moderate effects are considered to be significant in ES terms. There would be no adverse effects to townscape receptors during the operational phase.

The most sensitive townscape relationship is that with the industrial area to the immediate north of the site (townscape character area 5). A strategy of creating a buffer zone between the established industrial areas and the Proposed Development can be seen in these locations, which is secured through the Design Code. This includes siting of public parks (Parkland Neighbourhood) and the creation of a 'green curtain' and swales (Riverside Neighbourhood) along the site boundary. This will help to ensure the two uses are compatible and allow the industrial land to maintain its continued function.

The pockets of housing estates to the south and west of the site (townscape character areas 2 and 3) would experience a marked contrast in scale between the Proposed Development and existing finer grain development. The provision of a mixed-use development would be complementary to the existing residential uses and, mindful of the existing poor-quality townscape and industrial uses, would be an enhancement to the character of the area. The Proposed Development includes a range of commercial uses that further underpin the function and vitality of the area.

There would be no changes to the townscape assessment following the tier one cumulative scenario.

The tier 2 cumulative scenario includes the London Resort development. The proposals for this scheme are not subject to a valid planning application and so the details are not understood. However, the aspiration for the site is for comprehensive redevelopment with a high-density residential-led scheme. The change will be transformational for the townscape of the area. This would give rise to a higher magnitude of effect upon the site and land to the east. The overall effect would be Major and Beneficial.

In summary, all townscape character areas experience beneficial effects, ranging from Minor Beneficial to Moderate Beneficial (townscape character areas 1 and 5). This would rise to a Major Beneficial effect to townscape character area 1 and Moderate Beneficial to townscape character area 4 in the cumulative tier 2 scenario.

VISUAL

The visual assessment has considered the impact of the Proposed Development upon visual receptors. The assessment relates to how people will be affected by changes in views and visual amenity at different places.

During the demolition and construction phase the Proposed Development would give rise to effects ranging from None to Minor and Minor to Moderate Adverse. These likely effects would be indirect, temporary, short to medium-term and not significant.

The Proposed Development would not give rise to any adverse effect arising from the impact to visual receptors. The Proposed Development has been developed mindful of the sensitivity of adjacent land, including the varied topography. The submitted Proposed Development provides a

balance between the adjacent sensitive receptors and the delivery of high-density development.

In longer views, the Proposed Development would form an attractive element to the skyline. It would be seen in isolation in the existing context, although visually associated with Ebbsfleet International station. The proposed composition is well-considered and the overall height is commensurate with the aspirations of the site as a catalyst for regeneration.

There would be Minor to Minor to Moderate Beneficial effects on most of the visual receptors experiencing the Proposed Development. These effects would be not significant and would be direct, permanent and long-term.

There would be Moderate Beneficial effects arising from the impact to visual receptors experiencing views 14 and 15. These likely effects would be significant and would be direct, permanent and long term.

Views 5, 9 and 11 would have a None effect.

There would be no changes to the visual assessment following the tier one cumulative scenario.

The tier 2 cumulative scenario includes the London Resort development. The proposals for this scheme are not subject to a valid planning application and so the details are not understood. However, the aspiration for the site is for comprehensive redevelopment with a high-density residential-led scheme. The change will be transformational for the townscape of the area, including green space to the north and east of the site.

It is envisaged that the protected nature reserves would be retained. The visual amenity from areas near representative view 7 would therefore remain unchanged. From locations such as view 6 the area would undergo significant change. This is likely to give rise to a High magnitude of impact and the overall effect would be The magnitude of impact would be High and the overall effect would be Moderate to Major Beneficial.

The Proposed Development does not impact any strategic views identified by the development plan.

HERITAGE

A separate Heritage Statement has been prepared by Montagu Evans LLP, on behalf of the Applicant, in support of the Proposed Development.

The Statement forms a standalone document, appended to this Volume 2 of the ES (**Appendix 1**). Subsequent to the preparation of the Scoping Report for the ES, the Applicant and design team prepared a detailed assessment of heritage (contained in the Heritage Statement). The assessment is informed by information not available at the time of preparing the Scoping Report and which was commissioned specifically to understand potential heritage impacts, as well as inform the TVIA e.g. the additional AVRs, non-verified massing studies and ZTV.

The Heritage Statement has considered the impact of the Proposed Development on all above ground built heritage assets within a 1km radius of the site boundary, plus selected heritage assets at a greater distance that are highly sensitive due to their grading or location. The underlying characteristic of the setting for all heritage assets in the wider area is the topography of the land and, often, the relationship to the Thames.

The assessment finds that the Proposed Development preserves the significance of all heritage assets in the surrounding area. It would therefore satisfy chapter 16 of the NPPF, the relevant Policy CS20 of the Gravesham Local Plan Core Strategy (2014), and **Section 66** of the Planning (Listed Buildings and Conservation Areas) Act 1990.

The findings equate to no 'likely effects' in ES terms. Heritage was therefore scoped out of the main ES, although a summary of the findings is provided in the TVIA for completeness.

Paragraph 206 of the NPPF states that Local Authorities should look for opportunities for new development within the setting of heritage assets to enhance or better reveal their significance. Whilst the proximity of the site from designated heritage assets and/or their nature (such as Aspdin's kiln) offer limited opportunities to enhance the setting of heritage assets, opportunities to promote and communicate the heritage of the site are outlined in the submitted Design and Access Statement. These include heritage references within the public art adjoining Northfleet Harbour and Robin's Creek, and the provision of a heritage trail throughout Riverside Gardens. The application is submitted in outline only, but the Design Code outlines the principle of these details which may be delivered through

future reserved matters. The Design Code states they "must" be delivered, thus providing security of their delivery and allowing them to be considered by the decision maker as part of the Proposed Development. The delivery of these details may also be secured by the Council through a condition upon the application.

SUMMARY

The proposals have evolved through a detailed understanding of the site, its surrounding context and the aspirations of the development plan. Design development has benefited from discussions with Gravesham Borough Council during the pre-application process.

The site is an area identified by the development plan as an Opportunity Area for growth and with an allocation for residential-led development. The Proposed Development represents the design-led optimisation of a brownfield site that would contribute to the delivery of much needed housing development in accordance with Policy CS02 and the design guidelines of Policy CS03.

The TVIA demonstrates the urban design qualities of the Proposed Development would demonstrably improve the appearance, character and function of the townscape. It would also deliver improvements to visual amenity in an area that is currently fragmented and lacking a sense of place.

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1.0 INTRODUCTION

NORTHFLEET HARBOURSIDE

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INTRODUCTION

- 1.1
- Montagu Evans has been instructed by Northfleet Central 1 Limited (hereafter referred to as the 'Applicant') to provide consultancy services and produce this Townscape and Visual Impact Assessment (the 'TVIA') in support of proposals which are subject to an outline planning application at Northfleet Harbourside (the 'site').
- 1.2
- The description of development (the 'Proposed Development') is as follows:
"Outline planning application with all matters reserved, except for the primary means of access, for a mixed-use redevelopment involving the demolition of existing buildings and structures including site preparation / remediation works, and the development of residential units (Use Class C3), Use Class E floorspace including floorspace for retail, food and beverage, office floorspace and flexible Class E floorspace, floorspace for a new multi-use stadium with associated business and leisure facilities, floorspace for a hotel (Use Class C1), floorspace for community uses (Use Class F2) and other sui generis uses, delivery of open space and the realignment of the A226 Galley Hill Road / Stonebridge Road with hard / soft landscaping, car and cycle parking, highways works, infrastructure works, ancillary and associated works".
- 1.3
- The Proposed Development is subject to Environmental Impact Assessment (EIA). The TVIA forms Volume 2 of the Environmental Statement (ES) which is submitted with the application. The assessment is undertaken in accordance with the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended) ('the EIA Regulations').
- 1.4
- The site is located in the Borough of Gravesham (the 'Council'). The site is described in detail at Chapter 1 of the ES and also within the Design and Access Statement (DAS) prepared by UNStudio, HLM Architects and C+W O'Brien Architects. **Figure 1.1** shows the boundary of the site. An aerial view of the site is provided at **Figure 1.2**.



Figure 1.1 Site Plan



Figure 1.2 Aerial View. Source: Google (base map)

PURPOSE OF THE TVIA

- 1.5 The TVIA provides an assessment of likely impacts of the Proposed Development on townscape and visual receptors.
- 1.6 The townscape assessment will consider the Proposed Development within its urban context, including the buildings, the relationships between them, the different types of urban open spaces, including green spaces and the relationship between buildings and open spaces.
- 1.7 The visual assessment will consider the impact of the Proposed Development upon visual receptors. The assessment relates to how people will be affected by changes in views and visual amenity at different places, including publicly accessible locations. Visual receptors are always people (although usually visual receptors are defined according to use e.g. residential, business, road, footpath etc.), rather than landscape features.
- 1.8 The assessment as a whole is informed by 16 accurate visual representations ('AVRs') which have been prepared by visual consultants Eb7. The location of the viewpoints has been agreed with the Council during the pre-application and EIA Scoping process.
- 1.9 Further visual material has been prepared by Eb7 using LiDAR data are also provided to assist the assessment, discussed below.

BUILT HERITAGE

- 1.10 A separate Heritage Statement has been prepared by Montagu Evans LLP, on behalf of the Applicant, in support of the Proposed Development. The Statement forms a standalone document, appended to this Volume 2 of the ES (**Appendix 1.o**).
- 1.11 The Site does not comprise any heritage assets. There are heritage assets located in the area surrounding the Site and this Statement considers the potential for the Proposed Development to impact their significance by virtue of a change to setting. The assessment includes all heritage receptors within a 1km radius of the Site boundary. In addition, and following a Scoping Opinion from Gravesham Borough Council dated 16th September 2022 for the ES, the Applicant team has considered the potential impact of the Proposed Development beyond the 1km study area.

- 1.12
- The assets considered beyond the 1km study area include:
 - Tilbury Fort and Officer’s Barracks Tilbury Fort;
 - Church of St George;
 - Riverside Terminal (aka Riverside Station, including floating landing stage);
 - Parish Church of St Botolph;
 - Church of Our Lady of the Assumption;
 - Gravesend Riverside Conservation Area;
 - Windmill Hill Conservation Area.
- 1.13
- The assessment and design development has been informed by the AVRs. A list of potential verified view locations was issued to the Council on 14th July 2022. The Council confirmed the selected viewpoints were acceptable via email correspondence on 26th July, plus requested adding six more viewpoints. Those relating to heritage assets comprise:
 - From Tilbury Fort
 - From the River by Gravesend
- 1.14
- Verified views from Tilbury Fort are provided as part of this Statement (views 2 and 16). The view from the river by Gravesend is provided as a non-verified massing study (**Appendix 4.o**), discussed below.
- 1.15
- The wider study area beyond the 1km radius and assessment in general has been informed by the preparation of a zone of theoretical visibility (ZTV) extending c.3km east towards Gravesend town centre (**Appendix 3.o**). The ZTV has been produced to outline the potential areas where the Proposed Development may be visible. It has been produced by visual consultants, Eb7, using topographically referenced three-dimensional models from LiDAR data. It is a tool for a high-level understanding of the extent of visibility, which was further interrogated through review of individual viewpoints using field surveys and digital software.
- 1.16
- Following the ES Scoping, a further nine non-verified views, prepared by Eb7, were prepared to contextualise the ZTV and further inform the assessment of the impact of the Proposed Development on heritage assets.

- 1.17
- The Heritage Statement has considered the impact of the Proposed Development on all above ground built heritage assets within a 1km radius of the site boundary, plus selected heritage assets at a greater distance that are highly sensitive due to their grading or location. The underlying characteristic of the setting for all heritage assets in the wider area is the topography of the land and, often, the relationship to the Thames.
- 1.18
- The assessment finds that the Proposed Development preserves the significance of all heritage assets in the surrounding area. It would therefore satisfy chapter 16 of the NPPF, the relevant Policy CS20 of the Gravesham Local Plan Core Strategy (2014), and Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990.
- 1.19
- The findings equate to no ‘likely effects’ in ES terms. Heritage was therefore scoped out of the main ES, although a summary of the findings is provided in the TVIA for completeness.
- 1.20
- Paragraph 206 of the NPPF states that Local Authorities should look for opportunities for new development within the setting of heritage assets to enhance or better reveal their significance. Whilst the proximity of the site from designated heritage assets and/or their nature (such as Aspdin’s kiln) offer limited opportunities to enhance the setting of heritage assets, opportunities to promote and communicate the heritage of the site are outlined in the submitted Design and Access Statement. These include heritage references within the public art adjoining Northfleet Harbour and Robin’s Creek, and the provision of a heritage trail throughout Riverside Gardens. The application is submitted in outline only, but the Design Code outlines the principle of these details which may be delivered through future reserved matters. The Design Code states they “must” be delivered, thus providing security of their delivery and allowing them to be considered by the decision maker as part of the Proposed Development. The delivery of these details may also be secured by the Council through a condition upon the application.

STRUCTURE OF THE TVIA

- 1.21
- The TVIA is structured as follows:
 - The methodology for undertaking the TVIA for the ES assessment is provided at **Section 2.o**;
 - Legislation, planning policy and guidance relevant to the assessment of likely effects on heritage, townscape and visual receptors is set out at **Section 3.o**;
 - A description of the historical development of the site and surrounding area is provided at **Section 4.o**;
 - A description of the existing townscape character is provided at **Section 5.o**;
 - A summary of visual amenity and receptors is provided at **Section 6.o**;
 - **Section 7.o** describes the consultation that has been undertaken and embedded mitigation that has occurred as a result of this process and design development;
 - The impact of the Proposed Development on townscape receptors is assessed at **Section 8.o**;
 - An assessment of the impact of the Proposed Development on visual receptors is provided at **Section 9.o**; and
 - The TVIA is concluded at **Section 10.o**.

2.0 METHODOLOGY

NORTHFLEET HARBOURSIDE

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METHODOLOGY

- 2.1 The method is the product of legislation, policy and best practice guidance set out in **Section 3.0**. This section describes the overarching assessment framework and the different methodologies which apply to heritage, townscape and visual receptors.
- 2.2 The ES should be proportionate and not be any longer than is necessary to assess properly those potential likely effects.

SCOPING

- 2.3 This assessment is based on the Scoping Report submitted to the Council and the subsequent Scoping Opinion from Gravesham Borough Council dated 16th September 2022. The Scoping process identified the townscape and visual receptors which would be assessed in the ES.
- 2.4 The Scoping Report considered both townscape and visual receptors, and above ground built heritage receptors. Above ground built heritage receptors were scoped out of assessment by the Applicant due to the lack of any intrinsic historical link between the site and their heritage value, the separation distance of heritage receptors from the site, and the presence of interposing development. This is reaffirmed by the preparation of the ZTV which demonstrates the lack of intervisibility between the Proposed Development and heritage receptors.
- 2.5 A standalone Heritage Statement was prepared by Montagu Evans to assess the impact of the Proposed Development upon the significance of above ground built heritage receptors. The Heritage Statement has been submitted with the formal planning application. The Heritage Statement is appended to this Volume 2 of the ES.
- 2.6 A full overview of the Scoping Opinion from Gravesham Borough Council and responses by the Applicant are provided at **Section 7** of this Volume 2 of the ES.

TOWNSCAPE AND VISUAL DISCIPLINE

- 2.7 Townscape is defined in Guidelines for Landscape and Visual Impact Assessment, Third Edition (Landscape Institute and Institute of Environmental Management and Assessment, 2013) ('GLVIA3') as the *"built-up area, including the buildings, the relationships between them, the different types of urban open spaces, including green spaces, and the relationship between buildings and open spaces"*.
- 2.8 Visual impact assessment relates to how people will be affected by changes in views and visual amenity at different places, including publicly accessible locations. Visual receptors are always people, although usually visual receptors are defined according to use e.g. residential, business, road, footpath etc., rather than landscape features.

STUDY AREA

- 2.9 The study area for the TVIA comprises, but is not limited to:
- Townscape character areas up to 1km from the site;
 - Visual receptors up to 1km from the site.
- 2.10 The plans at the baseline sections identify all of the receptors identified in the study area. Site observations, a manual desk-based review of OS maps, characterisation studies and sensitive receptors were used to determine the study area. It has been informed by building locations and heights, topography and townscape features, and an understanding of the scale of the Proposed Development.
- 2.11 In addition, a ZTV has been produced to outline the potential areas where the Proposed Development may be visible. The ZTV extends to Gravesend town centre, as requested by the Scoping Opinion requested by the Council (**Figure 2.1**).
- 2.12 The ZTV has been produced using topographically referenced 3D models from LIDAR software. It is a tool for a high-level understanding of the extent of visibility, which was further interrogated through review of individual viewpoints using field surveys and digital software.

- 2.13 A list of viewpoints was issued to the Council on 14th July 2022. The Council confirmed the selected viewpoints were acceptable via email correspondence on 26th July, plus requested adding the following additional viewpoints:
1. From tilbury fort
 2. From the River by Gravesend
 3. From the River by Greenhithe/Swanscombe
 4. Lower Road / Stonbridge Road junction by the cottages
 5. Bottom of Stonebridge Road
 6. Top floor of Wallis Park
- 2.14 Views from Tilbury Fort are provided at section 9 (views 2 and 16).
- 2.15 Visibility from the two riverside locations (Nos. 2 and 3 by the Council) is clarified through the preparation of a zone of theoretical visibility at section 2. Non-verified massing studies prepared by Eb7 using LiDAR from Gravesend town centre (including from the riverfront) are also provided as part of this assessment.
- 2.16 The views from close proximity (Nos. 4 and 5) are not included as verified views, owing to the fact that these would be prepared as wire lines of maximum parameters only. Views from such close proximity would not be easily legible when prepared as wire lines. Accordingly, non-verified CGIs of the illustrative scheme are prepared in the Design and Access Statement that provide a visual understanding of these potential relationships – these are for information only and do not form the basis of assessment.
- 2.17 The view from the top floor of Wallis Park is not provided, as this TVIA considers publicly accessible vantage points only. It should be noted that the assessment does not comprise a 'residential amenity assessment', which considers private viewpoints from residential properties. This is separate from townscape and visual assessment (refer to GLVIA3, paragraph 6.17).
- ## SITE VISITS
- 2.18 A site survey of the baseline situation was undertaken by Montagu Evans during March 2022 to understand the site context.

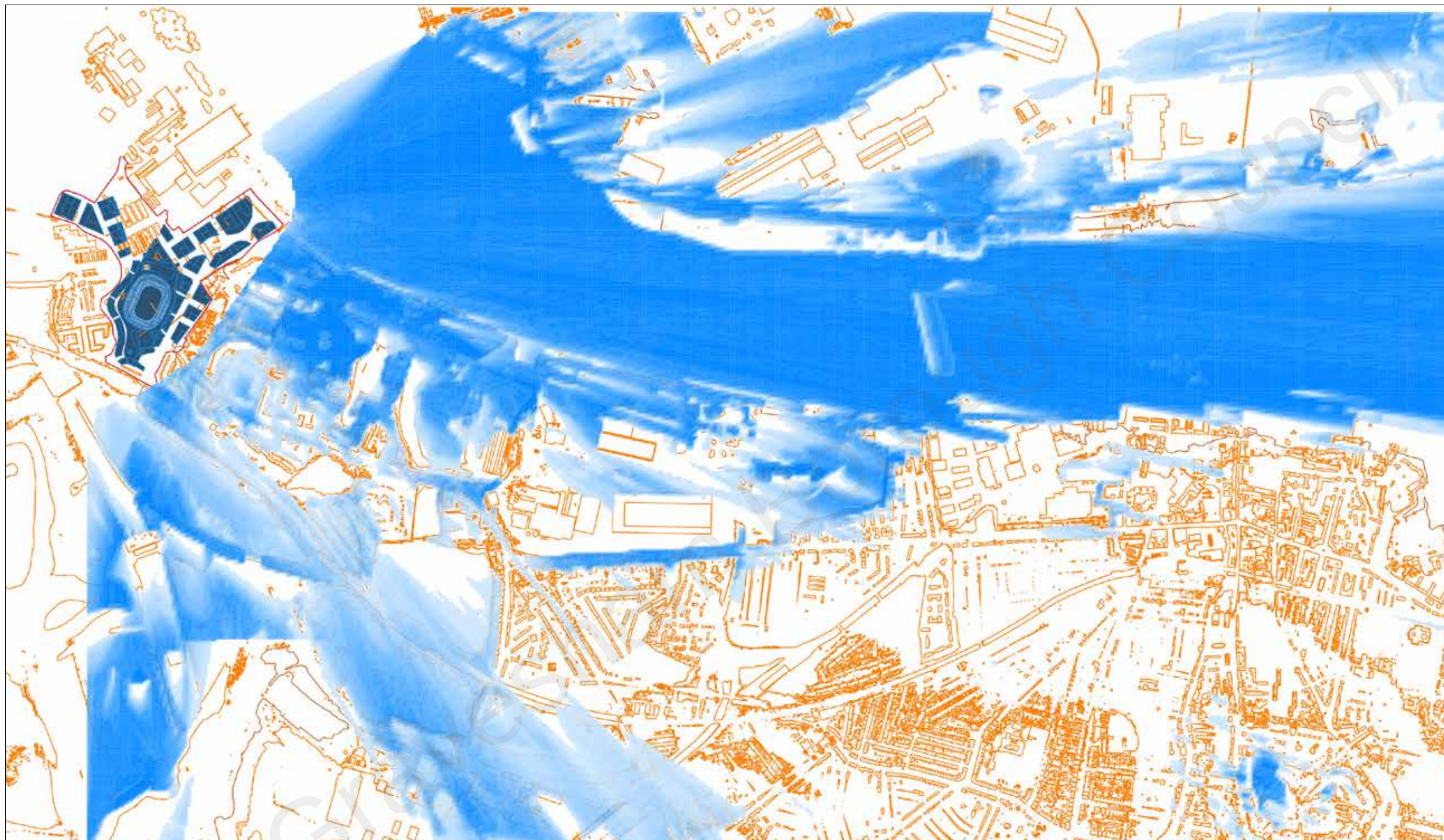


Figure 2.1 Zone of theoretical visibility prepared by Eb7. Source: LiDAR

ASSESSMENT METHODOLOGY

- 2.19 The overarching assessment framework follows a four-step process which are discussed below:
1. Baseline assessment of value;
2. Assessment of sensitivity;
3. Assessment of magnitude; and
4. Assessment of likely effects
- 2.20 The assessment framework is applied to all phases of the Proposed Development, including demolition, construction, operation and cumulative.

BASELINE ASSESSMENT OF VALUE

TOWNSCAPE AND VISUAL

- 2.21 The framework for assessment of townscape and visual impact has been prepared using the GLVIA3. The assessment has regard to the methodology set out in *An Approach to Landscape Character Assessment* (2014) prepared by Natural England.
- 2.22 The two components of townscape and visual assessment are:
1. The assessment of townscape effects: assessing effects on the townscape as a resource in its own right; and
2. The assessment of visual effects: assessing effects on specific views and on the general visual amenity experienced by people.

TOWNSCAPE

- 2.23 The townscape baseline assessment describes character areas/types and their key characteristics. It defines the distinct and recognisable patterns of elements, or characteristics that make one area different from another, rather than better or worse. These areas are defined and mapped with boundaries.
- 2.24 The mapped boundaries suggest a sharp change from one townscape area. On site, however, changes can be more subtle and practically, this often represents a zone of transition: townscape is therefore understood as a continuum. Townscape character areas are identified and assessed according to townscape receptor value (in relation to their built form, materials, maintenance, and statutory and non-statutory designations), using criteria contained in **Table 2.2**.

TOWNSCAPE RECEPTOR VALUE		
Value	Criteria	Examples/Features
Exceptional	Very attractive, unique or outstanding townscape with clearly distinctive characteristics, features and elements; Widespread use of quality materials; Very strong urban structure, characteristic patterns and balanced combination of built form and open space; Good condition; Appropriate management for land use; Unique sense of place; No detracting features.	Internationally or nationally recognised, and may comprise or include designated heritage receptors or sites of international or national importance
High	Very attractive townscape with distinctive or unusual features and elements; Evident use of quality materials; Strong urban structure, characteristic patterns and balanced combination of built form and open space; Appropriate management for land use with limited scope to improve; Strong sense of place; Occasional detracting features.	Nationally or regionally recognised and may include designated heritage receptors
Medium	Attractive townscape with some distinctive features; Recognisable urban structure, characteristic patterns and combinations of built form and open space; Scope to improve management for land use; Some features worthy of conservation; Sense of place; Some detracting features. To have this degree of value, the receptor must be of more than ordinary quality.	Regional or local recognition though generally undesignated, but value may be expressed through literature and cultural associations or through local plan designations, such as conservation areas.
Low	Typical, commonplace, ordinary and/or unremarkable townscape with limited variety or distinctiveness; Distinguishable and urban structure, characteristic patterns and combinations of built form and open space; Scope to improve management or land use; Some features worthy of conservation; Potentially some dominant detracting features and more limited areas of very low value.	Locally recognised. Certain individual townscape elements or features may be worthy of conservation, and townscape either identified for or would benefit from regeneration, restoration or enhancement. site or area may be valued at a community level.
Very Low	Townscape often in decline; Weak or degraded urban structure, characteristic patterns and combination of built form and open space; Lack of management has resulted in degradation; Frequent dominant detracting features; Disturbed or derelict land requires treatment.	Not formally recognised

Table 2.1 Townscape Receptor Value Criteria

- 2.25
- In all cases, assessment is informed by an understanding of how an area has evolved, the use of aerial photography and field survey along with desk-based research as appropriate and to a level commensurate with the sensitivity of the receptor and its susceptibility to change. Important published sources will normally comprise formal character assessments prepared, for example, as part of local plan making or agencies or county authorities.
- 2.26
- The objective of identifying the existing context is to provide an understanding of the townscape in the area that may be affected – its constituent elements, its character and the way this varies spatially, its geographic extent, its history, its condition, the way the townscape is experienced and the value attached to it. There is inevitably some overlap as between townscape and heritage values, which is recognised in best practice and reflected below.

VISUAL

- 2.27
- The visual baseline assessment established the area in which the development may be visible, the different groups of people who may experience views of the development, the places where they will be affected and the nature of the views and visual amenity at those points.
- 2.28
- The baseline study identifies individuals and/or defined groups of people within the area who will be affected by changes in the views, ‘visual receptors’. The following visual receptors are identified by GLVIA3 as being likely to be the most susceptible to change:
 - Residents and other frequent users of the area;
 - People, whether residents or visitors, who are engaged in outdoor recreation, including use of public rights of way, attractions or those whose attention or interest is likely to be focused on the landscape and on particular views; and
 - Communities where views contribute to the landscape setting enjoyed by residents in the area.
- 2.29
- It should be noted that the assessment does not comprise a ‘residential amenity assessment’, which considers private viewpoints from residential properties. This is separate from townscape and visual assessment (refer to GLVIA3, paragraph 6.17).
- 2.30
- Assessment viewpoints are identified based on a comprehensive review of the surrounding area, including the following criteria:
 - Heritage receptors;
 - Townscape character;

- Where the development may be prominent;
- Be visible from concentrations of residential areas;
- Open spaces (parkland, publicly accessible space);
- Potentially sensitive receptors (e.g. schools);
- Accessibility to the public;
- The viewing direction, distance and elevation;
- Townscape and transport nodes;
- Street alignment.

2.31 The identification of viewpoints also considers any strategic or local viewpoints identified by the local planning authorities or other relevant bodies. The views are identified and assessed according to their visual amenity value, using the criteria contained in **Table 2.3**.

VISUAL AMENITY VALUE	
Value	Criteria / Examples
Exceptional	Identified in strategic views, into and out of World Heritage sites, and/or views of national and international importance.
High	Views identified in the statutory development plan and/or views of national or regional importance, or particular local importance. May comprise public open spaces where focus is on views/public rights of way through highly valued townscape, regional routes or the immediate setting of elements of national cultural heritage value that are not compromised.
Medium	View identified in Supplementary Planning Documents including conservation area appraisals, and/or views of regional or local importance. May comprise public rights of way through townscapes of moderate value, setting for elements of local and/or regional cultural heritage value or national value whose settings are already compromised.
Low	A view in an area of ordinary townscape value or good townscape value where significant elements detract.
Very Low	A view in an area of very low townscape quality (e.g. industrial areas/busy main roads) that have very few positive characteristics.

Table 2.2 Visual Amenity Value Criteria

ASSESSMENT OF SENSITIVITY

- 2.32
- The first stage in the assessment of the Proposed Development on a townscape or visual receptor is to identify its sensitivity to the Proposed Development.
- 2.33
- The assessment of sensitivity is based on an understanding of the Proposed Development. It is identified by calibrating the baseline value of the receptor with its susceptibility to the type of change introduced by the Proposed Development.
- 2.34
- Susceptibility is the ability of the receptor to accommodate the Proposed Development without undue consequences for the maintenance of the baseline situation and/or the achievement of planning policies and strategies. For heritage receptors, susceptibility considers the setting of the receptor in conjunction with its value and the particular nature of the proposals. The criteria for determining susceptibility is described at **Table 2.4**.
- TOWNSCAPE
- 2.35
- GLVIA3 explains landscape susceptibility at pages 88–89. There is no specific definition of townscape susceptibility. Professional judgement is applied based on the understanding of landscape susceptibility to reach judgements on townscape susceptibility.
- 2.36
- GLVIA3 describes susceptibility to change of landscape receptors as “*the ability of the landscape receptor (whether it be the overall character or quality/condition of a particular landscape type or area, or an individual element and/or feature, or a particular aesthetic and perceptual aspect) to accommodate the Proposed Development without undue consequences for the maintenance of the baseline situation and/or the achievement of landscape planning policies and strategies.*”
- 2.37
- Susceptibility is relative to the specific type of development proposed e.g. a receptor may be more or less susceptible to a proposal for an industrial facility as opposed to a residential building depending on the receiving environment. Equally, a receptor may be more or less susceptible to a tall building than a low-rise development depending on the receiving environment.

2.38 Effects are particular to the specific landscape / townscape in question, which includes reference to aspects such as the quality, nature and condition of the receptor, or, existing scale and grain e.g. if the existing townscape is of a similar scale and / or grain as the Proposed Development, it may have a greater ability to accommodate the Proposed Development and thus a lower susceptibility to change, subject to those existing characteristics not undermining or undue consequence arising from that baseline condition.

VISUAL

2.39 GLVIA3 explains visual susceptibility at pages 113–114. Page 113 sets out that susceptibility of different visual receptors to changes in views and visual amenity is mainly a function of:

- The occupation or activity of people experiencing the view at particular locations;
- The extent to which their attention or interest may therefore be focused on the views and the visual amenity they experience at particular locations.

2.40 Visual receptors who are more likely to have a high susceptibility to change include residents at home, people who are engaged in activities that involve an appreciation of the surrounding landscape or townscape, and visitors to heritage assets or other attractions.

2.41 Visual receptors who are more likely to have a low susceptibility to change include users of amenity space that does not depend on or involve an appreciation of the surrounding landscape / townscape such as people engaged in sports activities. GLVIA3 states on page 114 that *“each project needs to consider the nature of the groups of people who will be affected and the extent to which their attention is likely to be focused on views and visual amenity.”*

2.42 The baseline value of the receptor and its susceptibility are calibrated using the matrix at **Table 2.5**. Sensitivity is recorded in a verbal scale (high, medium or low), supported by the clear narrative linked to evidence from the baseline study and an assessment of susceptibility.

ASSESSMENT OF MAGNITUDE

- 2.43 The second part of the assessment stage is to identify the magnitude of impact arising from the Proposed Development on the heritage, townscape or visual receptor.
- 2.44 The magnitude of impact is a qualitative judgement supported by the narrative text within the assessment. The professional judgement is quantified using criteria at **Table 2.6**.
- 2.45 The judgement of magnitude considers the size or scale, geographical extent or duration and reversibility of the impact and whether the Proposed Development:
- Conforms with the pattern, scale, mass, grain and historic features of the receptor;
 - Creates a loss or restoration of key features of the receptor;
 - Contributes to the identified receptor character; and
 - Accords with national, regional and local planning policy and guidelines.

SUSCEPTIBILITY TO CHANGE CRITERIA	
High	The receptor has a low ability to accommodate the specific proposed change e.g. the visual receptor is likely to be heavily engaged on the view / visual amenity and/or the type of development is incongruent to the baseline condition or would undermine the enjoyment of the visual receptor. The existing townscape / landscape comprises very limited or no similar types of development to that proposed and/or the townscape / landscape policies do not anticipate this type of development.
Medium	The receptor has a medium ability to accommodate the specific proposed change e.g. the visual receptor is likely to be partially engaged on the view / visual amenity and/or the type of development is congruent to aspects of the baseline condition or would undermine aspects of the enjoyment of the visual receptor. The existing townscape / landscape comprises some similar types of development to that proposed and/or the townscape / landscape policies anticipate some of this type of development.
Low	The receptor has a high ability to accommodate the specific proposed change e.g. the visual receptor is likely to not be engaged on the view / visual amenity and/or the type of development is congruent to the baseline condition or would not undermine the enjoyment of the visual receptor. The existing townscape / landscape comprises similar types of development to that proposed and/or the townscape / landscape policies do anticipate this type of development.

Table 2.3 Susceptibility of Receptor to Change Criteria

SENSITIVITY			
Receptor Value	Susceptibility of Receptor to Change		
	Low	Medium	High
Very Low	Low	Low	Low/Medium
Low	Low	Low/Medium	Medium
Medium	Low/Medium	Medium	Medium/High
High	Medium	Medium/High	High
Exceptional	Medium/High	High	High

Table 2.4 Sensitivity (Nature of Receptor Likely to be Affected)

MAGNITUDE OF IMPACT	
High	Considerable change to the value of the receptor. The proposals are a new component, ranging from a notable change in receptor characteristics over an extensive area to intensive change over a more limited area. The proposals would be very noticeable. Loss of or major alteration to key elements/features/ characteristics of the baseline. The duration of this impact may be permanent and non-reversible.
Medium	A clearly discernible change to the value of the receptor. The proposals are dissimilar to a main component of the receptor but similar to other components. The proposals would be readily noticeable. Partial loss of or alteration to one or more key elements/ features/characteristics of the baseline. The duration of this impact may be semi-permanent and partially reversible.
Low	Slight change to the value of the receptor. The proposals are similar to a main component of the receptor but similar to other components. The proposals would not be readily noticeable. Minor loss of or alteration to one or more key elements/ features/characteristics of the baseline. The duration of this impact may be temporary and reversible.
Very Low	Barely discernible change to the value of the receptor. Very minor loss of or alteration to one or more key elements/ features/characteristics of the baseline.
Nil	No change to the value of the receptor.

Table 2.5 Magnitude of Impact Criteria

ASSESSMENT OF LIKELY EFFECTS

2.46 Likely effects are determined by combining the judgements of sensitivity and the magnitude of impact using a common matrix shared across all topic areas (Table 2.7). It is generally considered that moderate to major effects are considered ‘significant’ in the context of the EIA Regulations. Criteria defining the scale of effect is provided at Table 2.8.

Likely Effect on Receptor			
Magnitude	Sensitivity		
	Low	Medium	High
Nil	None	None	None
Very Low	Negligible	Negligible	Negligible / Minor
Low	Minor	Minor / Moderate	Moderate
Medium	Minor / Moderate	Moderate	Moderate / Major
High	Moderate	Moderate / Major	Major

Table 2.6 Likely Effect on Receptor Matrix

Scale of an Effect	
Major	The Proposed Development would give rise to a very significant effect on the receptor.
Moderate	The Proposed Development would give rise to a significant effect on the receptor.
Minor	The Proposed Development would give rise to an effect on the receptor, but this would not be significant.
Negligible	The Proposed Development would give rise to a barely discernible effect on the receptor. This would not be significant.
None	The Proposed Development would have no effect on the receptor.

Table 2.7 Scale of an Effect

2.47 Professional judgement is required to determine the nature of the likely effects. Criteria defining the nature of effect is provided at Table 2.9. For example, there will be cases where a high magnitude of impact produces a major scale of effect, on the basis that the component is prominent or noticeable, but notwithstanding that the quality of effect is beneficial as a consequence of design quality or other benefits. This approach arises most often as a consequence of major developments in areas positively identified for transformational change. Often, such impacts will have varied effects such that a hard and fast categorisation of an effects quality is finely balanced as between beneficial or harmful. In many instances, therefore, the final identification of impact and effect will turn on discursive analysis. This makes a necessary professional adjustment to the tabular analysis format which can produce inaccurate reporting.

2.48 The assessment of scale and nature of effect requires a qualitative discussion to describe and elucidate this judgement to the reader. This is necessary because townscape and visual assessment is not a strict quantitative process and some of these considerations will depend on expert judgements. Accordingly, there is an emphasis on qualitative text throughout the TVIA to elucidate how the judgements have been made.

Nature of an Effect	
Beneficial	An advantageous effect to a receptor
Neutral	An effect that on balance, is neither beneficial nor adverse to a receptor.
Adverse	A detrimental effect to a receptor

Table 2.8 Nature of an Effect

2.49 The assessment also considers whether the likely effect is:

- direct or indirect;
- reversible or irreversible;
- permanent or temporary;
- short, medium or long term.

ACCURATE VISUAL REPRESENTATIONS

- 2.50 The TVIA as a whole is informed by AVRs. The AVRs in particular provide the basis for the assessment of the Proposed Development and its effect on people, by virtue of change to views or visual amenity.
- 2.51 The AVRs have been prepared in accordance with best practice guidance, including TGN 06/19 Visual Representation of Development Proposals Technical Guidance Note (2019) prepared by Landscape Institute. The methodology prepared by Eb7 is provided at Appendix 2.0.
- 2.52 The AVRs are provided in the following scenarios:
- Existing = baseline photography
 - Proposed = Existing plus the Proposed Development
 - Cumulative = Proposed Development plus schemes in the surrounding area that are subject to an extant consent or valid planning application (see cumulative sub-section below).
- 2.53 The objective of a photomontage is to simulate the likely visual changes that would result from a Proposed Development, and to produce printed images of a size and resolution sufficient to match the perspective in the same view in the field.
- 2.54 Accurate visual representation is two-dimensional and cannot capture the complexity of the visual experience. It is an approximation of the three-dimensional visual experience the observer would receive on site. Neither do they capture transient significant effects arising from noise or traffic on perception, or that wider range of expectations and associations that anyone in an urban scene may have.
- 2.55 A visit to the location from which the photographs were taken is strongly encouraged to appreciate and understand the visual impact.
- 2.56 The text accompanying each view seeks to contextualise it. Inevitably one must accept that judgement is involved in this specialist area on the basis of the above and the importance of design quality in the operation of policy. In preparing any written assessment, allowances are made for these factors as well as the assessor’s knowledge of the scheme.

CUMULATIVE EFFECTS

- 2.57
- GLVIA3 sets out two main approaches to inter-project effects between any given Proposed Development and cumulative schemes (See GLVIA, paragraph 7.18). The first approach is to focus:
primarily on the additional effects of the main project under consideration... on top of the cumulative baseline
- 2.58
- The second approach is to focus:
on the combined effects of all the past, present and future proposals together with the new project
- 2.59
- This assessment takes the first approach, which is to focus on the additional effects of the Proposed Development on top of the cumulative baseline. It is considered that this approach is best suited to an urban environment, in which the cumulative effects between the Proposed Development and other cumulative schemes may be complex (including situations in which the effect of the Proposed Development could be lessened or removed entirely by cumulative schemes) and because, as also acknowledged in the GLVIA3, it may not be considered reasonable to assess the effect of many complex schemes other than the Proposed Development in the manner required by the ‘combined effects’ approach.
- 2.60
- The cumulative assessment will take the form of two tiers, described in chapter 2 of the ES and discussed below.

TIER 1 CUMULATIVE ASSESSMENT

- 2.61
- Generally, the ‘Tier 1’ cumulative schemes that are included within the cumulative effects assessment fall under one (or more) of the following criteria:
 - Schemes that will produce an uplift of more than 10,000m2 (Gross External Area (GEA) of mixed-use floorspace), or any office to residential conversions (granted under the General Permitted Development Order) giving rise to more than 150 residential units, whereby they:
 - have full planning permission, a resolution to grant permission; OR
 - have been submitted (but not yet permitted), where considered appropriate.

TIER 2 CUMULATIVE ASSESSMENT

- 2.62
- Given the proximity of the proposed London Resort scheme located to the north-west of the site, a major infrastructure scheme which is currently withdrawn, and the potential for cumulative effects to occur, this scheme is considered as a ‘Tier 2’ cumulative scheme. Several other schemes that are not subject to a valid planning application are also considered, where relevant and outlined in the ES.
- 2.63
- It is understood that a revised planning application will be submitted for the London Resort scheme following the submission of the planning application for the Proposed Development. Due to the changing nature of the proposals and lack of final scheme information for the proposed London Resort development, which is yet to be re-submitted for planning, a qualitative assessment has been undertaken where relevant with regards to this cumulative scheme, taking into consideration its status within the planning system, the information freely available on the scheme and any resulting potential material changes to the effects established as a result of the Proposed Development in combination with the Tier 1 cumulative schemes set out above.

MITIGATION

- 2.64
- Mitigation measures proposed to prevent, reduce or offset any significant likely adverse effects have been identified and developed as part of the pre-application design process. The primary mitigation measures have become embedded into the project design, commonly referred to as embedded mitigation. The mitigation arising from design development and consultation responses is identified at **Section 7.0**.
- 2.65
- The likely effects of the Proposed Development include embedded mitigation. As a result, there is no requirement for additional mitigation and thus likely residual effects remain the same as the likely effects, unless otherwise stated.

CLIMATE CHANGE

- 2.66
- The likely effects of the Proposed Development are defined under the current climate conditions, which may alter under a future climate scenario. The EIA Regulations require that the change in impact magnitude and a receptor’s ‘vulnerability’ (i.e. susceptibility or resilience to change) are considered in respect of a future climate condition.
- 2.67
- The vulnerability of the receptors according to the definitions provided in the guidance, and it has been judged that all of the heritage, townscape and visual receptors have low vulnerability.
- 2.68
- The likely projected future conditions for each of temperature, precipitation, wind speed and cloud cover have been considered. It is considered that the magnitude of impact and resultant nature and scale of the effects of the Proposed Development during the operational phase will not be changed under the future climate conditions.
- 2.69
- Overall, the likely effects of the Proposed Development are unlikely to change as a result of climate change.



Figure 2.2 Dimetric View of Tier 1 Cumulative Schemes modelled by Eb7

Gravesham Borough Council

3.0 PLANNING POLICY CONTEXT

NORTHFLEET HARBOURSIDE

Gravesham Borough Council

PLANNING POLICY CONTEXT

3.1 The following section sets out the planning policy context for the site and for the context of the assessment process.

DEVELOPMENT PLAN

- 3.2 Section 38(6) of the Planning and Compulsory Purchase Act 2004 stipulates that where in making any determination under the Planning Acts, regard is to be had to the development plan, and the determination must be made in accordance with that plan unless material considerations indicate otherwise.
- 3.3 The statutory development plan and the policies relevant to the assessment of heritage, townscape and visual considerations are set out at **Table 3.1** below.

DEVELOPMENT PLAN POLICY	KEY PROVISIONS
Gravesham Local Plan Core Strategy (2014)	Policy CS03: Northfleet Embankment and Swanscombe Peninsula East Opportunity Area Policy CS19: Development and Design Principles

Table 3.1 Development Plan Policy Relevant to TVIA

NATIONAL POLICY

3.4 The Development Plan is supported by the planning policies set out in the NPPF. The relevant provisions are set out at **Table 3.2**.

NATIONAL POLICY	KEY PROVISIONS
National Planning Policy Framework (NPPF) 2021	Chapter 12 (Achieving well-designed places) Paragraph 130 Paragraph 132 Paragraph 134

Table 3.2 National Planning Policy Relevant to TVIA

MATERIAL CONSIDERATIONS

- 3.5 In addition to legislation and policy, the assessment will take into consideration relevant planning guidance and any material considerations, including:
- National Planning Practice Guidance (online);
 - Guidelines for Landscape and Visual Impact Assessment Third Edition (GLVIA) (2013);
 - An Approach to Landscape Character Assessment (2014);
 - TGN 06/19 Visual Representation of Development Proposals Technical Guidance Note (2019) prepared by Landscape Institute
 - Tall Buildings: Historic England Advice Note 4 (2022); and
 - Kent Design Guide (2005).

PRINCIPLE OF DEVELOPMENT

PRINCIPLE OF HIGH-DENSITY DEVELOPMENT

- 3.6 The aspirations to regenerate the wider area around the site are set out in the development plan. It is a key strategic objective (SO1) of the Core Strategy to concentrate *“development on underused, derelict and previously developed land in the urban area of Gravesend and Northfleet, in particular former industrial sites along the Thames Riverside and in Gravesend town centre”*. The Core Strategy identifies a need for more housing, given the housing shortage and growing population across the borough. Significant change with the creation of new neighbourhoods along the riverfront is expected. This would entail the transition from predominantly heavy riverside industry to diverse range mix of uses and new, sustainable communities. The new communities will complement the existing residential areas, helping improve public transport and developing new job opportunities.
- 3.7 The site itself falls within the Northfleet Embankment and Swanscombe Peninsula East Opportunity Area (SPEOA), identified in the Core Strategy as one of four opportunity areas in Gravesham. The SPEOA comprises several sub-areas. The site covers the western part of sub-area 1.2 and contains sub-area 1.3 entirely. The Core Strategy states that *“it is anticipated that this area will remain in active employment uses over the plan period. The retention and expansion of industrial and port related*

employment in this area will be supported”. Sub-area 1.3 is deemed to have regeneration potential, provided potential contamination issues are addressed and the industrial legacy protected. Existing uses, such as the football ground, need to be integrated into new use concepts.

- 3.8 The planning policy context for Northfleet is underpinned by its good public transport links, both to Gravesend town centre and London via the Southeastern railway network, including the high-speed connections to St Pancras and Ashford. This provision supports intensification of land uses, including high density residential development.

POLICY-DRIVEN DEVELOPMENT CONSIDERATIONS

- 3.9 The development potential of the site and wider area is restrained by infrastructure, the presence of the high-speed railway line, high voltage power lines and limited vehicular access via Galley Hill Road. In 2021, Swanscombe Peninsula, located to the north of the site, was identified as a site of Special Scientific Interest (SSSI) in recognition of its national importance for flora and fauna. Industrial activities continue within the SPEOA.
- 3.10 The aspirations for development are guided in part by the SPEOA which suggest for sub-area 1.3 *“to improve and enhance Robin’s Creek and the Ebbsfleet stream; improve greenspace; and reduce heavy commercial traffic and parking on Grove Road”*.
- 3.11 The Kent Design Guide (2005) comprises guidance on delivering high quality tall buildings. The design team has reviewed this local guidance, in conjunction with more recent national guidance.

4.0

BASELINE: HISTORICAL DEVELOPMENT

NORTHFLEET HARBOURSIDE

Gravesham Borough Council

BASELINE: HISTORICAL DEVELOPMENT

- 4.1 The section has been informed by secondary sources, including:
- Historic maps, including Ordnance Survey;
 - Gravesham Borough Council, The Hill, Northfleet Conservation Area Character Appraisal (2007);
 - Mills, A.D., A Dictionary of British Place Names (2011)
 - Historic photographs, including Britain from Above. Available online at <https://www.britainfromabove.org.uk/>;
 - Design for Ebbsfleet: Learning From the River and Industry: Northfleet trade and industry (2022). Available online at <https://www.designforebbsfleet.org/learning-from-the-river-industry-northfleet-trade-industry>.

HISTORIC DEVELOPMENT OF NORTHFLEET

EARLY HISTORY

- 4.2 It is understood that the earliest long-term settlers in Northfleet arrived during the 5th century with the Saxons. This saw the construction of a church on the site of the existing St Botolph's Parish Church, located atop the hill looking north over the river Thames. The settlement evolved around the Manor of Norfluet which had formerly belonged to the Archbishop of Canterbury in 748. In the 19th century, a Saxon Cemetery was discovered in Northfleet.
- 4.3 In the Domesday Survey of 1086, it is recorded that Northfleet was home to 200 settlers and mainly comprised the Manor, a church, a mill, a market hall and a tithe barn set within open green space mainly comprising fields, farms and woodland.
- 4.4 The area began evolving from a rural farming settlement in by the 16th century following the establishment of the London-to-Dover road and due to the increase in industrial practices which required the river.

EIGHTEENTH CENTURY

- 4.5 During the 18th century a number of shipyards and waterside inns were established around Northfleet Hythe. Notably, Pitcher's Shipyard was located in Northfleet which saw the construction of many ships for the East India Company and the Royal Navy among others.
- 4.6 There was also significant and extensive excavation of the chalk cliffs which was used to construct many large houses for wealthy industrialists who were associated with the shipyards in the area. In lieu of the former chalk cliffs, more mills and factories were built along the foreshore. These factories were used for cement production which led to further development in the area including new roads connecting Northfleet and Gravesend by the Turnpike Commissioners.

NINETEENTH CENTURY

- 4.7 The landscape of Northfleet changed dramatically during the 19th century as a result of extensive chalk excavation. Further excavation led to a flatter topography and further industrial development on the foreshore in Northfleet and towards Gravesend. The area surrounding the historic town centre and industrial developments was still largely comprised of fields and open green space.
- 4.8 In the 1830s the Rosherville Gardens were opened, which featured clifftop walks, a small theatre, a bear pit and a lake set within beautiful gardens. Following the opening of the gardens, there was a collective development effort to create housing in Northfleet with the intention of it being an 'exclusive suburb' of Gravesend.
- 4.9 By the 1850s the Rosherville Gardens were attracting upwards of 20,000 visitors a week which was bringing more people to Northfleet and the surrounding area. The railway was improved in the mid-19th century which saw an increase in visitors and the construction of some large houses to the south of Overcliffe, located to the southeast of the site, and road connections were further improved and trams were introduced as a result of increased development and popularity.
- 4.10 The prominent industrial and residential development over the 18th and 19th centuries can be seen in the 1869 and 1898 OS Maps. At this time, the site was occupied by industrial uses such as gas works and cement works as well as some commercial uses including a number of public houses.

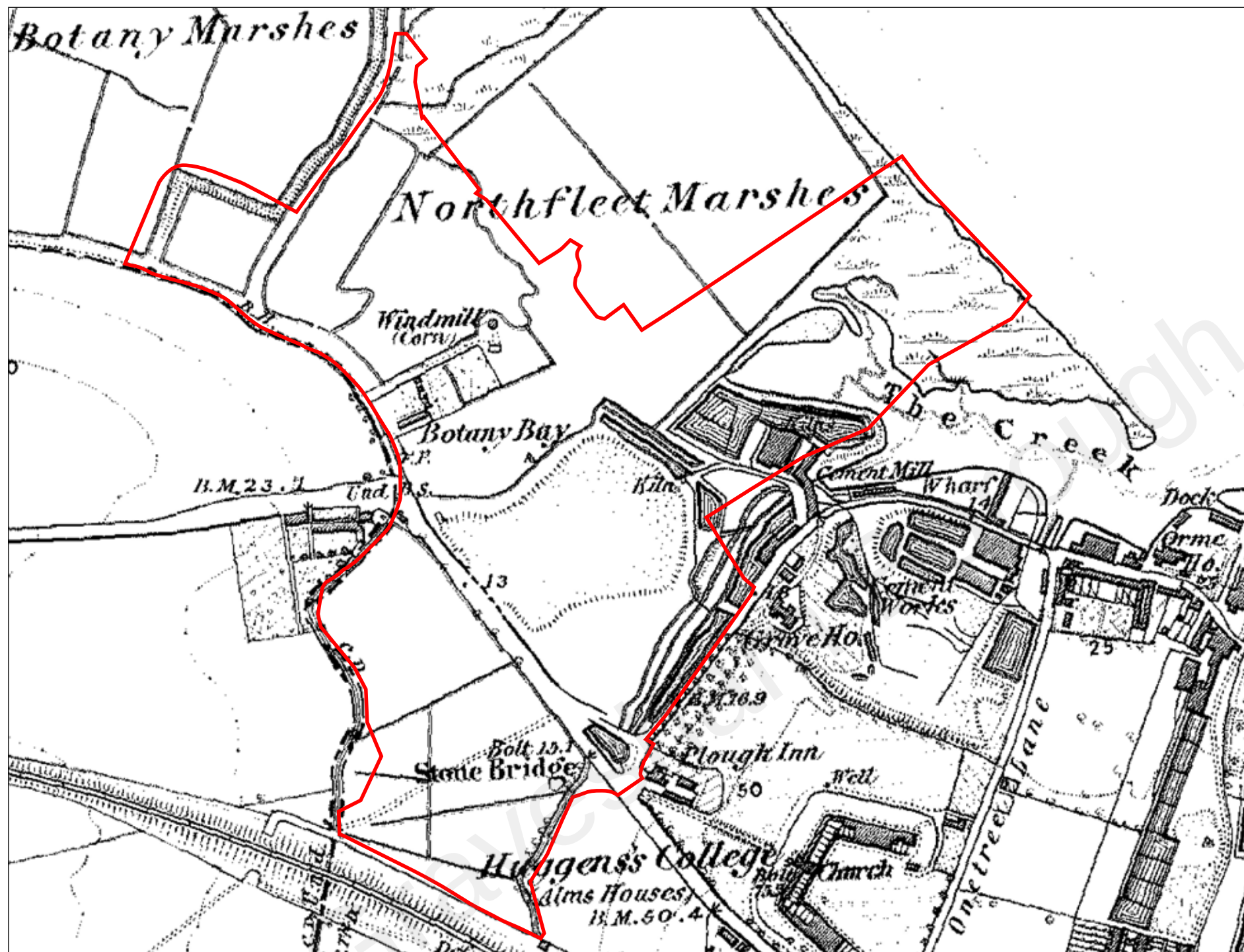


Figure 4.1 1869 OS Map

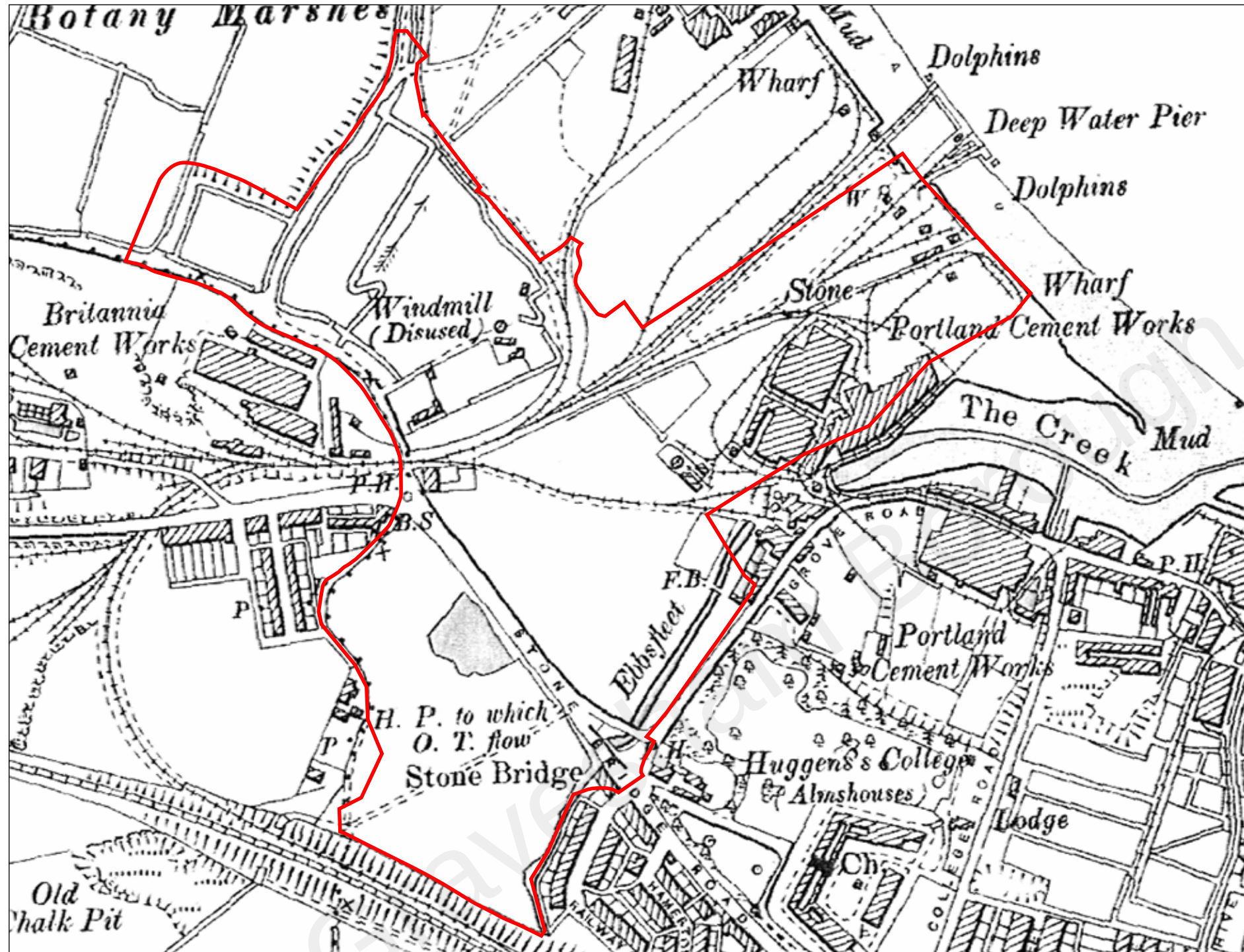


Figure 4.2 1898 OS Map

20TH CENTURY

- 4.11 Throughout the 20th century, much of the land along the Ebbsfleet and Robins Creek had been covered by industrial facilities (Portland cement works, lead works and paper works). Over time, large-scale sheds replaced the earlier brick buildings, such as the cement works which incorporated Aspdin's kiln.
- 4.12 The kiln is not visible from the road. The site has now been acquired by Ebbsfleet Garden City as part of the wider masterplan. The draft masterplan shows the kiln in a new townscape setting as a freestanding structure overlooking the main public space at Robins Creek. Bellway Homes is developing a piece of land to the east ("Harbour Village") which introduces further housing into the setting of the heritage receptor.
- 4.13 In 1905, the Northfleet United Football Club (established 1890) was opened on the site along Stonebridge Road where it still exists today. Northfleet Football Club has a prominent local following and the grounds provide a community space due to their local popularity.
- 4.14 The tourist trade diminished during the 20th century and the Rosherville Gardens closed as a result. Industrial development further expanded including the Henley Telegraph Works in Northfleet which produced trans-Atlantic submarine telegraph cables and was an invaluable organisation during the Second World War. Following World War Two, industrial development continued, and many infill residential developments were built in Northfleet and the surrounding area.

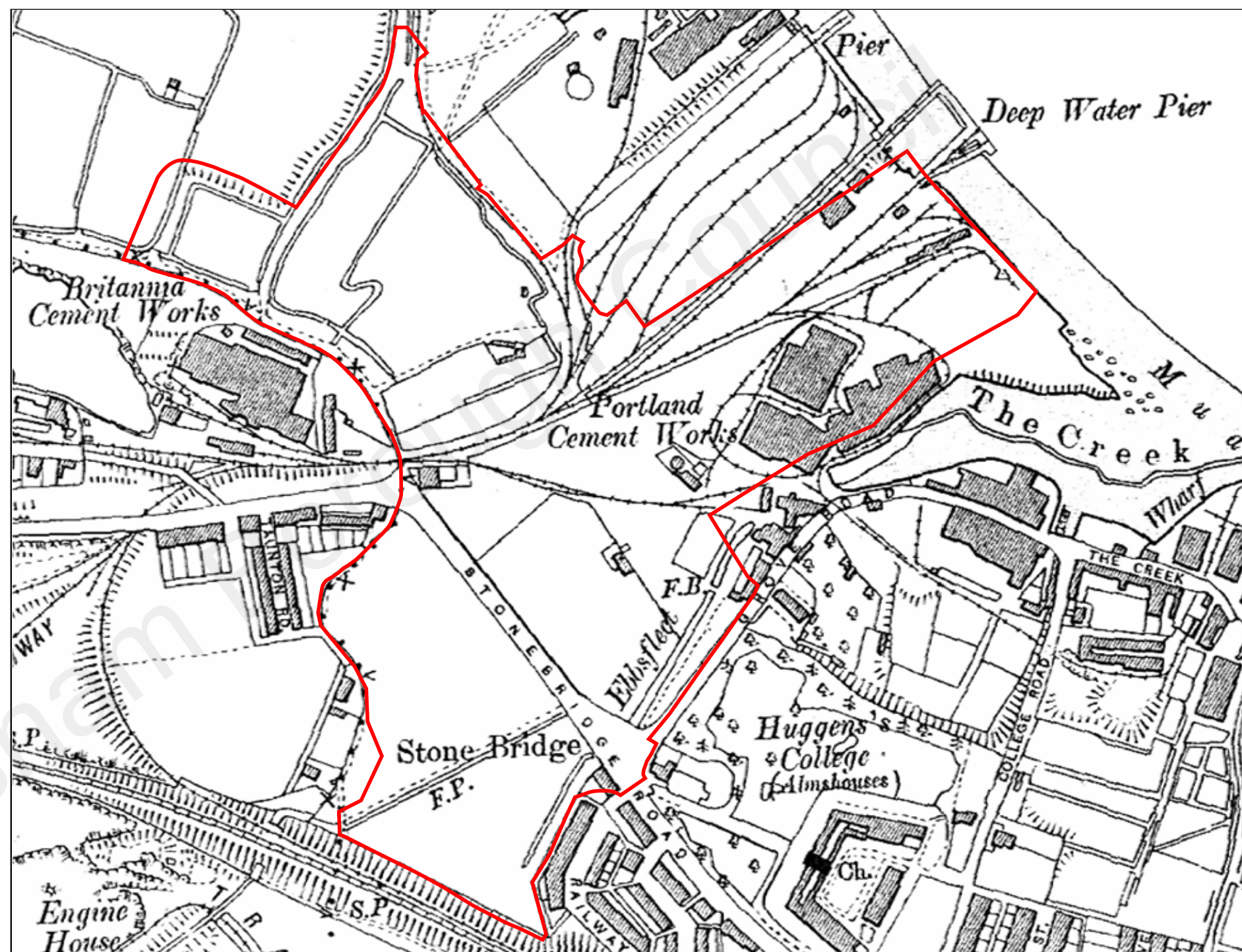


Figure 4.3 1910 OS Map

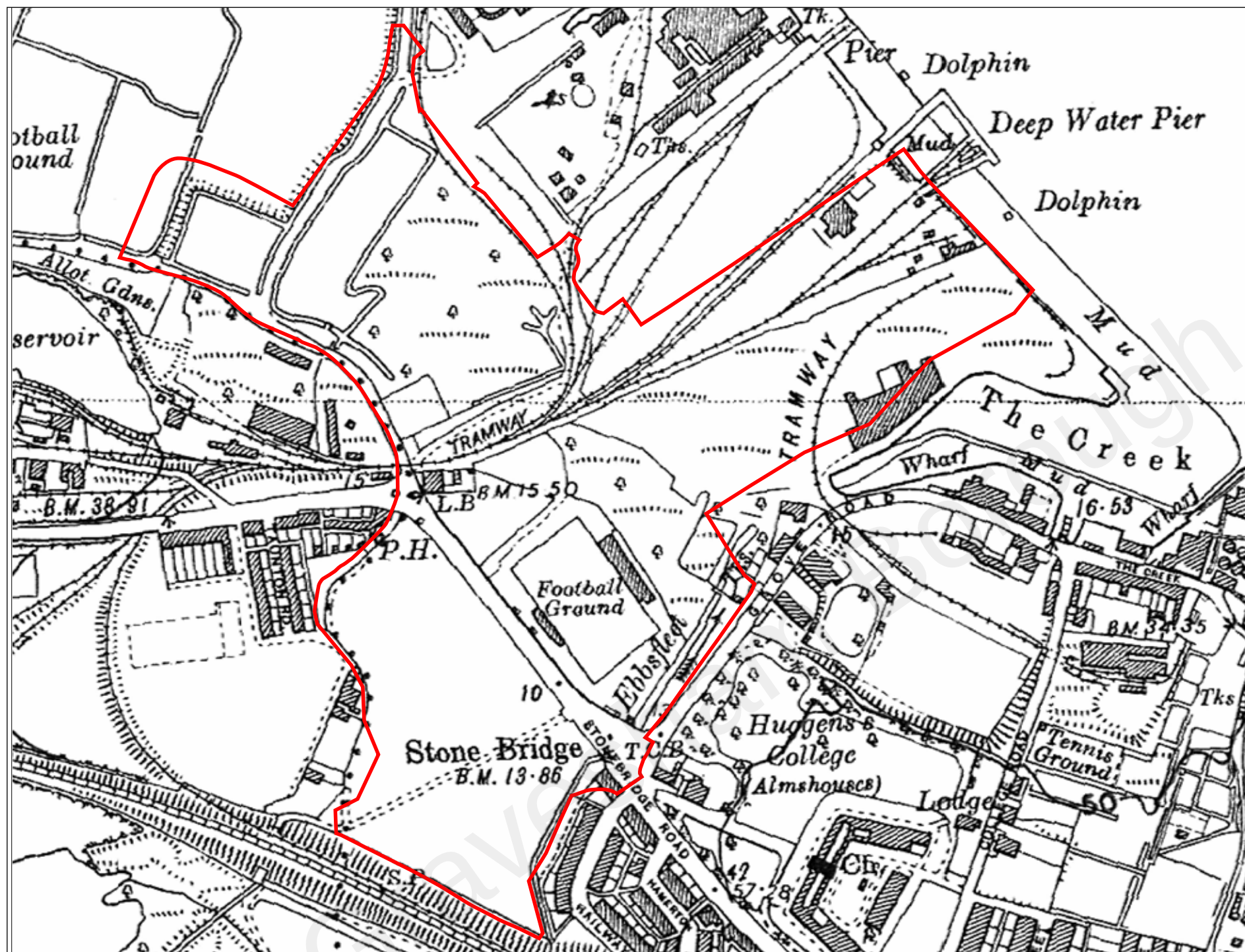


Figure 4.4 1951 OS Map

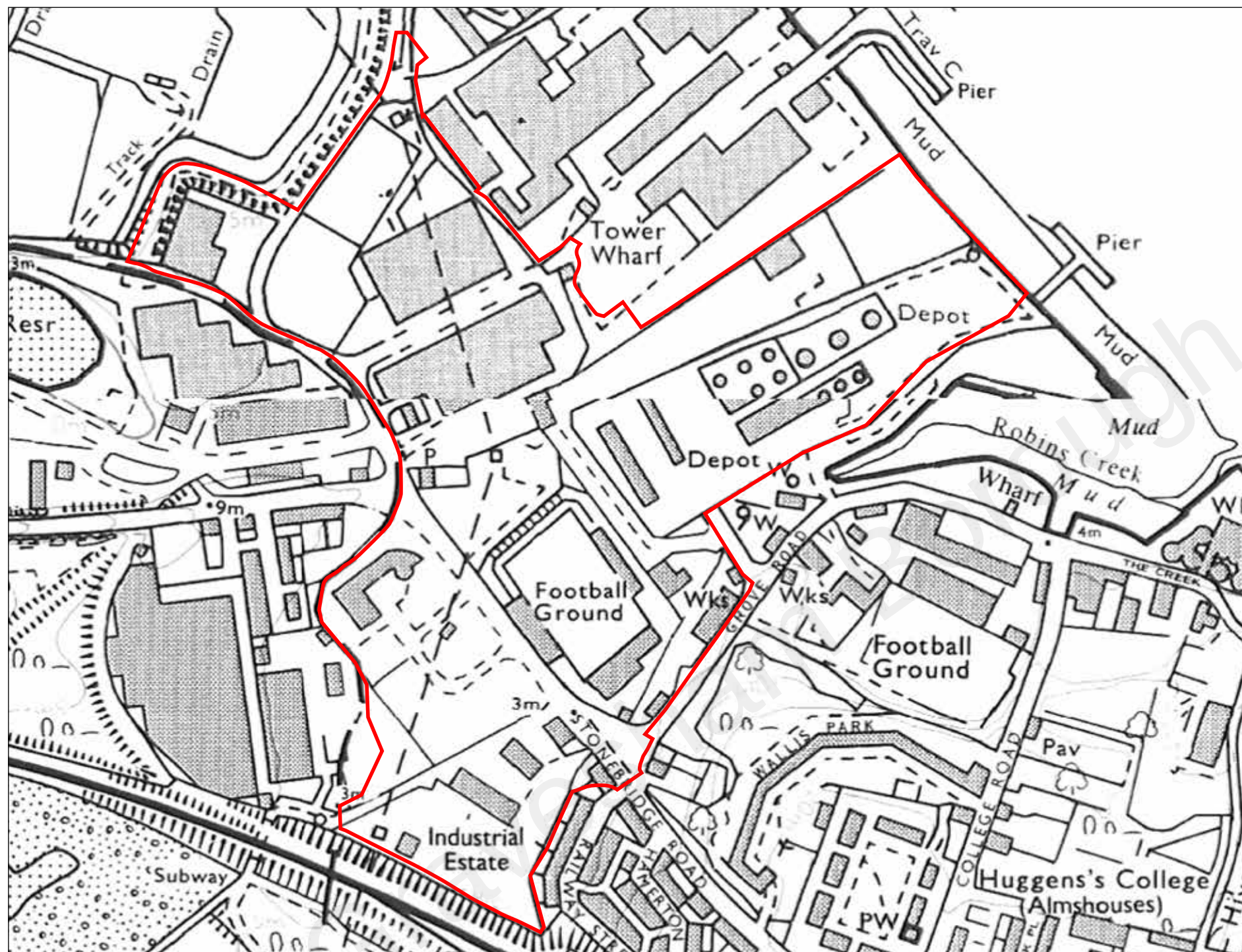


Figure 4.5 1991–1993 OS Map

PRESENT DAY

- 4.15 Eventually, by 21st century, many of the industrial sites were cleared and are now being prepared for residential developments. The regeneration of the area, including by the Ebbsfleet Garden City project, is underway and the character of the area is fundamentally changing. Ebbsfleet International Station, serving Eurostar and high-speed services, opened in 2007 and is located to the southwest of the site.



Figure 4.6 Present Day Aerial Photograph

5.0 BASELINE: TOWNSCAPE

NORTHFLEET HARBOURSIDE

Gravesham Borough Council

BASELINE: TOWNSCAPE

5.1 This section provides analysis of the townscape study area and the identified character areas.

TOWNSCAPE ANALYSIS

5.2 The site falls in the Gravesend and Northfleet urban area which is the main location for housing and employment in the borough. Over the last 100 years, the area has undergone major changes. Rural marshland until the late 19thth century, Northfleet became a centre of the British cement industry. Cement plants and quarries occupied much of the land along the river. Many of these industries have now disappeared, leaving large swathes of brownfield land behind. Environmental issues, such as ground pollution, dust and air quality are being addressed.

5.3 Industrial estates and large footprint sheds sit between pockets of housing, traditional early 20th century terraces and post-war blocks of flats. Several sites have been earmarked for redevelopment, for example Harbour Village by Bellway Homes to the east of the site.

5.4 There are also substantial pieces of green land, often former quarries or other replanted industrial sites. The high-speed railway tracks to Ebbsfleet, Ashford and the Eurotunnel are cut through the landscape. High voltage power lines run across the study area.

TOWNSCAPE CHARACTER AREAS

5.5 The townscape surrounding the site may be categorised into seven distinct areas. For the purposes of this assessment the character areas are referred to as:

- 1. Mixed-use/commercial estate
- 2. Historic town centre
- 3. 20th century housing
- 4. Green Space
- 5. Industrial
- 6. River Thames
- 7. Transport infrastructure

5.6 The broad boundaries of the character areas are identified in **Figure 5.2**. The character and appearance of the character areas is discussed below.

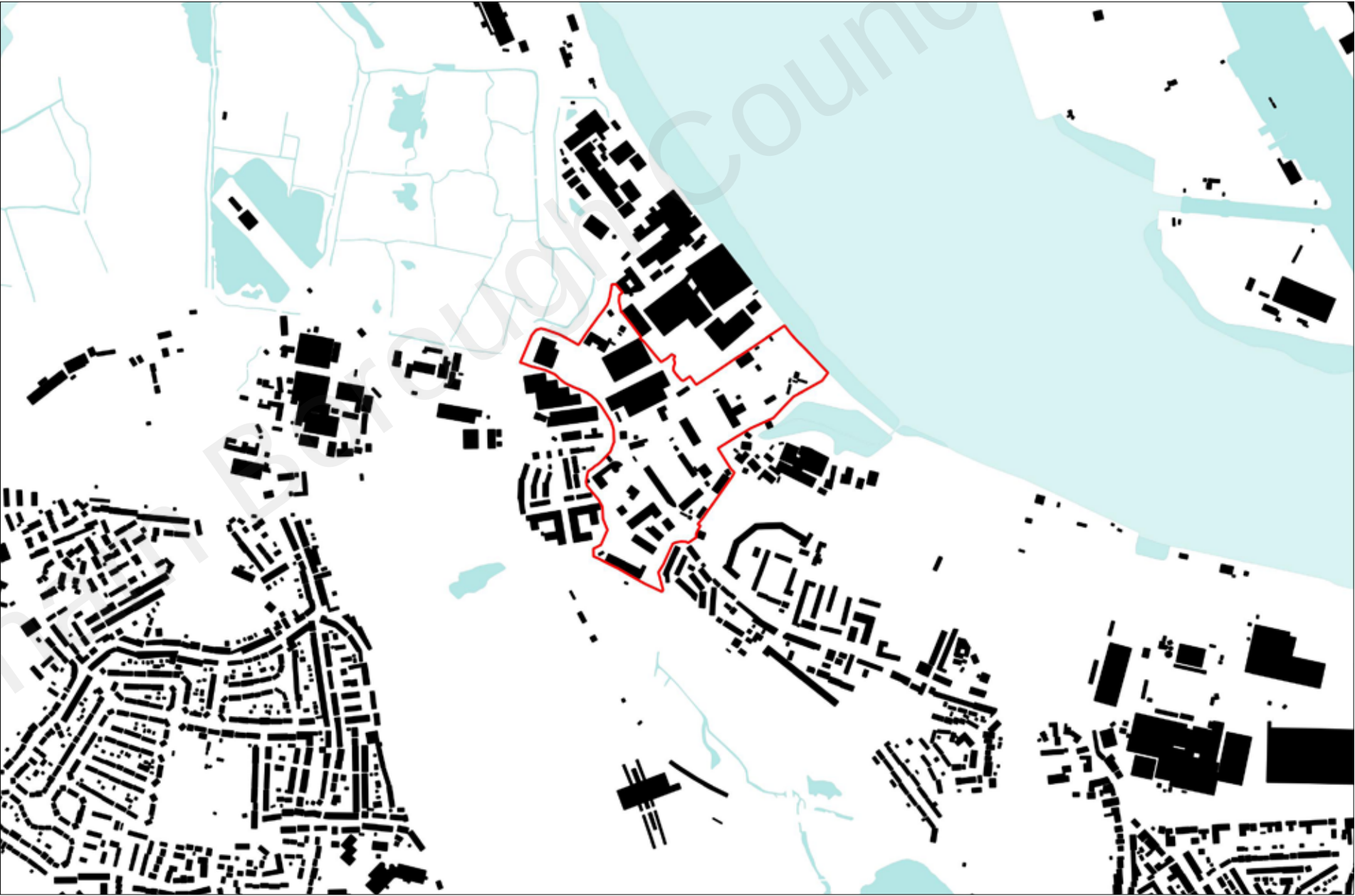
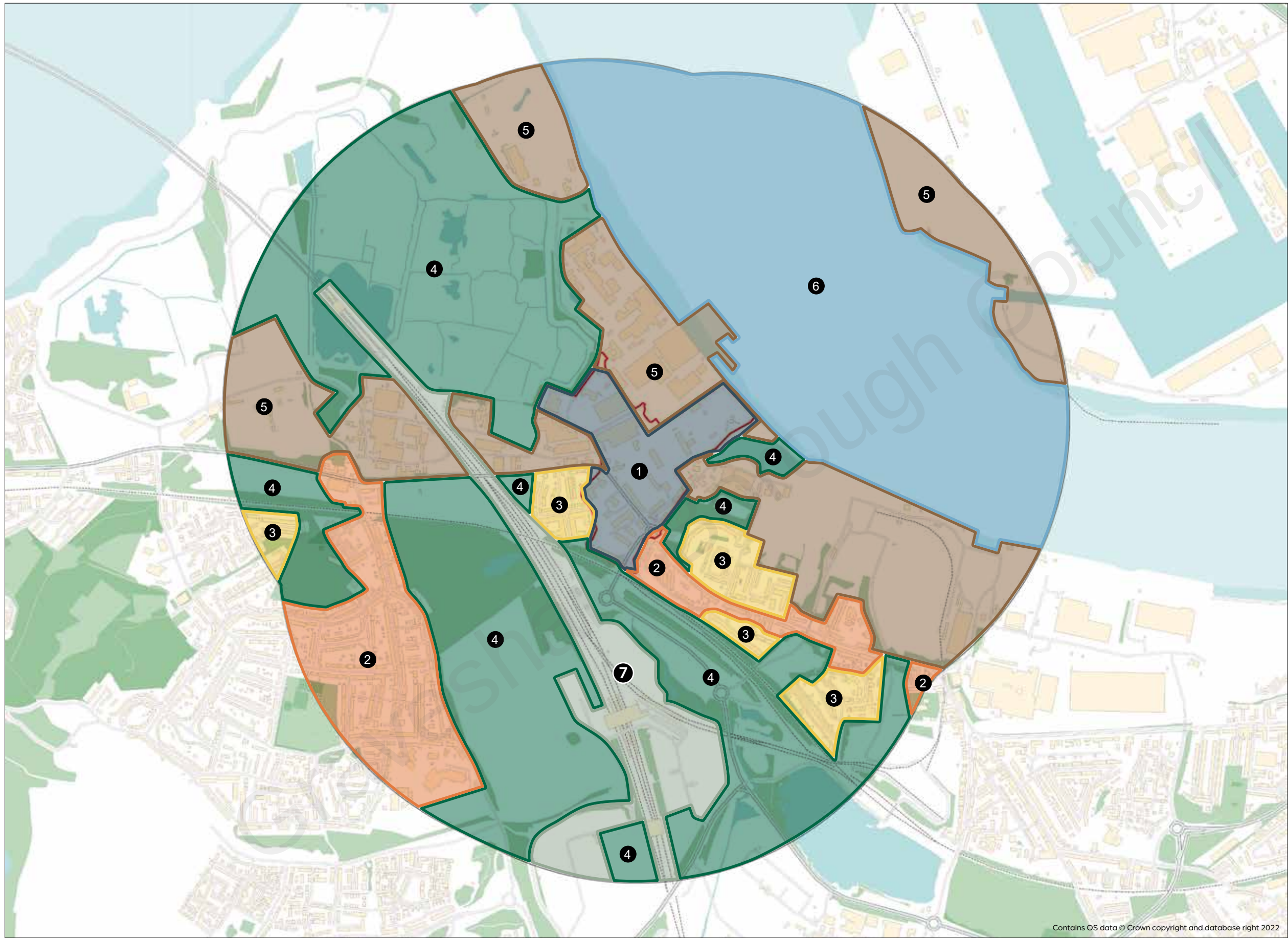


Figure 5.1 Townscape Analysis Diagram



TOWNSCAPE CHARACTER AREA PLAN

- Application Site
- 1 Mixed-use/commercial estate
- 2 Traditional town centre
- 3 20th century housing
- 4 Green Space
- 5 Industrial
- 6 River Thames
- 7 Transport infrastructure

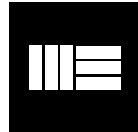
LOCATION:
Northfleet Central

DATE:
September 2022

SCALE:
1:12,500 @ A3

FIGURE 5.2 Townscape Character Area Plan

▲ NORTH



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CHARACTER AREA 1: MIXED-USE/COMMERCIAL ESTATE

- 5.7
- Character Area 1 comprises land immediately south of the site and beyond. It is characterised by a number of commercial and mixed-use buildings.
- 5.8
- The built form reflects the uses of the area and is made up a complex of dispersed small to medium sized units. Buildings are set within large areas of hardstanding, which often form areas of storage of vehicular parking.
- 5.9
- Buildings date from the late twentieth century and are typically low rise in height. Structures are built from a range of materials including brick, steel and corrugated metal, and feature low pitched, M-shaped or flat roofs. Buildings are generally utilitarian in appearance, serving as part of the commercial and light industrial development.
- 5.10
- The majority of units in Character Area 1 have commercial uses including a Ford dealership, garages, a gym and a small convenience store and coffee shop.
- 5.11
- The area is primarily experienced by local employees and users of the road and football club which bounds the northern edge of the character area.
- 5.12
- Associated viewpoint: 15
- 5.13
- Townscape value: **Very Low**

CHARACTER AREA 2: HISTORIC TOWN CENTRE

- 5.14
- Character Area 2 comprises the historic town centre of Northfleet is located to the south-east of the site and the historic town centre of Swanscombe located to the south-west of the site. The site is separated from Swanscombe historic town centre by transport infrastructure and a large open area of green space.
- 5.15
- The townscape of Northfleet historic town centre has a strong east-west emphasis, influenced by the axis of the historic streets which run parallel to the riverbank, High Street and Station Road in particular.
- 5.16
- The townscape of Swanscombe historic town centre has a strong north-south emphasis, highlighted by Stanhope Road and Church Road.
- 5.17
- The grain of townscape of Swanscombe and Northfleet historic town centre is generally fine and tight knit, forming a loosely gridded arrangement informed by the main arterial routes; Milton Road, Stanhope Road, Church Road and Ames Road in particular. Larger plots are generally occupied by post-war infill development with low to medium scale semi-detached and terraced houses.

- 5.18
- Despite Swanscombe and Northfleet’s town centre characterisation, built form is primarily residential, although commercial and other uses, including civic, leisure and institutional, are interspersed.
- 5.19
- There are some small areas of open green space within the character area, including Swanscombe Park and Cemetery as well as well as a football field and Lawn Community Primary School within Northfleet. There are mature trees and shrubs that line some of the streets.
- 5.20
- Some of the housing stock is traditional in character, dating principally from the 19th and early 20th century. Principal building materials are brick, slate tiles. There are no conservation areas or listed buildings within Swanscombe Town Centre and there is one Grade II listed building within Northfleet historic town centre, the Factory Club which contributes positively to the Northfleet historic town centre.
- 5.21
- Associated viewpoint: 5, 11, and 13
- 5.22
- Townscape value: **Low to Medium**

CHARACTER AREA 3: 20TH CENTURY HOUSING

- 5.23
- Character Area 3 comprises mid to late 20th century housing which is interspersed through the study area. The housing is largely reflective of infill residential development which links the historic town centres and the industrial character areas. There are a number of new 21st century residential developments amid construction in former industrial areas which form a spatial and aesthetic relationship with the 20th century housing.
- 5.24
- The 20th century housing tends to comprise perimeter blocks, slabs and terraced housing set within large areas of hardstanding and small areas of green space. The buildings tend to be low to mid rise, at 2 to 6 storeys in height. Terraced houses are 2 storeys in height. The buildings are set within a coarse and tight urban grain, connected by networks of small streets.
- 5.25
- There are small areas of green space interspersed throughout the housing featuring some mature trees and shrubs.
- 5.26
- There are no listed buildings within the character area.
- 5.27
- Associated viewpoint: 8 and 12
- 5.28
- Townscape value: **Low**

CHARACTER AREA 4: GREEN SPACE

- 5.29
- Character Area 4 comprises areas of open green space, these are interspersed through the study area, predominantly to the north and south of the site. All of the open space in the area comprising parks is part of the public realm, contributing to the amenity of the area. The green space to the north of the site forms part of Swanscombe Marshes and Botany Marshes nature reserves.
- 5.30
- The largest green space is Botany Marshes which lies to the north of the site. It comprises an open space of protected marshes which is open to the public. This is also the closest open space to the site.
- 5.31
- There are a number of other green spaces forming Character Area 4, including Northfleet Urban Country Park to the south, unnamed green space comprising fields and woodland to the west and some further stretches of unnamed green space to the north of Ebbsfleet Station. These open green spaces are characterised by mature trees, open fields and Sawyer’s Lake is located to the north of Northfleet Urban Country Park. Most of the green spaces tend to have pedestrian pathways that provide valuable amenity space within surrounding urban townscape.
- 5.32
- The site is well served by open space which contributes to residential and social amenity value.
- 5.33
- The areas of green space are primarily experienced by pedestrians and those undertaking leisure activities.
- 5.34
- Associated viewpoint: 6, 7, 9, 10, 11 and 14
- 5.35
- Townscape value: Medium

CHARACTER AREA 5: INDUSTRIAL

- 5.36
- Character Area 5 is characterised by a number of former industrial uses. The site comprises former industrial uses and part of Character Area 5.
- 5.37
- Buildings mainly date from the 18th and 19th centuries and a large part formed the Bevan Cement works which is located to the immediate east of the site. The built form within the character area reflects the uses of the area and is made up of complexes of large sized industrial units, factories and warehouses. Buildings are set within large areas of hardstanding and surrounded by road infrastructure. Much of the character area is located on the coast of the Thames.

- 5.38
- The buildings range in size and age, with most of them dating from the 18th and 19th century. Structures are built from a range of materials, including brick, iron and steel. Buildings are generally utilitarian in appearance, serving as part of the commercial and industrial development.
- 5.39
- The industrial built form in the area is undergoing significant change, much of it is being demolished and redeveloped into residential estates.
- 5.40
- The area is primarily experienced by workers and construction workers as well as residents of nearby residential developments.
- 5.41
- Associated viewpoint: 3, 4, 8 and 14
- 5.42
- Townscape value: Very **Low**

CHARACTER AREA 6: RIVER THAMES

- 5.43
- Character Area 6 comprises the bend of the River Thames that curves around Northfleet Hope and is located to the immediate north-east of the site.
- 5.44
- The river is used by commercial and leisure traffic and is experienced both from the water and the embankments. The reflective qualities of the water surface and variations in colour and texture caused by weather conditions give this area a special quality.
- 5.45
- Due to the open expanse of water, the river provides a vantage point from which to view along the embankment.
- 5.46
- Associated viewpoint: 1, 2 and 16
- 5.47
- Townscape value: **Medium**

CHARACTER AREA 7: TRANSPORT INFRASTRUCTURE

- 5.48
- Character Area 7 comprises of the key arterial highways which run through the Northfleet area. The highways are formed of large roads which fragment the area. The character area also comprises rail infrastructure and Ebbsfleet International Station and Northfleet Station to the south and south-east of the site.
- 5.49
- The highways are primarily built from concrete with tarmac road surfaces. Steel is used as a supporting material and used as part of the barriers to either side of the roads.
- 5.50
- The highways divide the townscape and act as a physical and visual barrier to the east of the study area. They are utilitarian in appearance, serving part of the transport network.

- 5.51
- The rail infrastructure and Northfleet Station has been a longstanding characteristic of the study area since it was opened in 1849. Ebbsfleet International Station was opened in November 2007 as part of the ongoing international rail operation and was opened in anticipation of international travel during the 2012 Olympics. The station has a modern appearance which has reinvigorated the area. The rail infrastructure is predominantly built from steel and concrete.
- 5.52
- The rail infrastructure divides the study area through the centre from east to west. It is utilitarian in appearance, serving as part of the transport network.
- 5.53
- Whilst the character of the transport infrastructure is generally open, much of it is not accessible to the public and only transiently experienced when travelling along its roads. Bordered by large metal and concrete barriers, and adjacent buildings, the area is well defined and relatively enclosed.
- 5.54
- The character area is predominantly experienced by road and rail users.
- 5.55
- Associated viewpoint: 4, 9 and 10
- 5.56
- Townscape value: Very Low

TOWNSCAPE SUMMARY

- 5.57
- Table 5.1 presents a summary of the townscape receptor baseline information.

REF.	TOWNSCAPE CHARACTER AREA	TOWNSCAPE VALUE	FULL ASSESSMENT REQUIRED?
1	Mixed-use/commercial estate	Very Low	Yes
2	Town centre	Low to Medium	Yes
3	20th century housing	Low	Yes
4	Green Space	Medium	Yes
5	Industrial	Very Low	Yes
6	River Thames	Medium	Yes
7	Transport infrastructure	Very Low	No

Table 5.1 Summary of Townscape Receptor Baseline.

Gravesham Borough Council

6.0

BASELINE: VISUAL

NORTHFLEET HARBOURSIDE

Gravesham Borough Council

BASELINE: VISUAL

- 6.1
- The TVIA is supported by 16 AVRs. The location of the AVRs is provided at **Figure 6.1**. **Table 6.1** below provides an overview of the main considerations for each view, including any additional considerations such as the proximity to key transport nodes. A further nine non-verified views have also been prepared by Eb7 using LiDAR data from selected locations to demonstrate the extent, or lack, of visibility of the Proposed Development.
- 6.2
- A description of the existing scene for each identified view and the likely visual receptors are provided at **Section 9.0**. This description is set alongside a corresponding AVR of the Proposed Development and analysis of any significant effect occurring.



VIEW LOCATION PLAN

- Application Site
1. Riverfront at Gray's Beach End
 2. Tilbury Fort
 3. Galley Hill Road / High Street junction
 4. Galley Hill Road rail intersection
 5. High Street / Lawn Road junction
 6. Walkway between Stanhope Road and train tracks (looking east)
 7. Green Space to the west of Manor Way (looking south)
 8. Robinson Way / Black Eagle Drive junction
 9. Ebbsfleet International Car Park C (looking north)
 10. Thames Way roundabout
 11. Station Road
 12. Stonebridge Road (looking north)
 13. Railway Street / Hamerton Road junction
 14. The Creek / Grove Road
 15. Grove Road / Stonebridge Road roundabout
 16. Tilbury Fort Quay

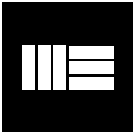
LOCATION:
Northfleet Central

DATE:
September 2022

SCALE:
1:12,500 @ A3

FIGURE 6.1 View Location Plan

▲ NORTH



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VIEW	LOCATION	DISTANCE TO SITE	TOWNSCAPE CHARACTER	HERITAGE ASSETS	VISUAL RECEPTORS	AVR TYPE	ADDITIONAL CONSIDERATIONS
1	Gray's Beach Riverside Park	1.9 km	Commercial Residential Open Space Institutional Place of Worship	N/A	Pedestrians Users of amenity space	Wire Line (AVR1)	N/A
2	Tilbury Fort (a)	3.35 km	Open Space	Tilbury Fort (Scheduled Monument)	Pedestrians Users of amenity space	Wire Line (AVR1)	N/A
3	Galley Hill Road / High Street junction	913 m	Road infrastructure Industrial Transitional	Church of All Saints (Grade II8)	Road users Pedestrians	Wire Line (AVR1)	N/A
4	Galley Hill Road rail intersection	550 m	Road infrastructure Industrial Transitional	N/A	Road users Pedestrians	Wire Line (AVR1)	N/A
5	High Street / Lawn Road junction	850 m	Road infrastructure Industrial Transitional	The Factory Club (Grade II)	Local residents Bus commuters Road users	Wire Line (AVR1)	N/A
6	Walkway between Stanhope Road and train tracks (looking east)	465 m	Open space Transport infrastructure Industrial Transitional	N/A	Local residents Pedestrians Users of amenity space	Wire Line (AVR1)	Key pedestrian link
7	Green Space to the west of Manor Way (looking south)	647 m	Open space Industrial	N/A	Local residents Pedestrians Users of open space	Wire Line (AVR1)	N/A
8	Robinson Way / Black Eagle Drive junction	121 m	Residential	N/A	Local residents	Wire Line (AVR1)	N/A
9	Ebbsfleet International Car Park C (looking north)	560 m	Transport infrastructure Transitional	N/A	Road users Rail station users / commuters	Wire Line (AVR1)	Park and Ride carpark
10	Thames Way roundabout	260 m	Transport infrastructure Transitional	N/A	Road users	Wire Line (AVR1)	N/A
11	Station Road	300 m	Residential	N/A	Local residents Rail station users / commuters	Wire Line (AVR1)	Local train station
12	Stonebridge Road (looking north)	240 m	Residential Road infrastructure Transitional	N/A	Road users Local residents	Wire Line (AVR1)	N/A
13	Railway Street / Hamerton Road junction	220 m	Residential	N/A	Local residents Rail station users / commuters	Wire Line (AVR1)	N/A
14	The Creek / Grove Road	260 m	Industrial	N/A	Users and workers of the industrial site	Wire Line (AVR1)	N/A
15	Grove Road / Stonebridge Road roundabout	0 m	Commercial Transport infrastructure Transitional	N/A	Road users	Wire Line (AVR1)	N/A

Table 6.1 Summary of viewpoint selection rationale.

7.0 CONSULTATION AND MITIGATION BY DESIGN

NORTHFLEET HARBOURSIDE

Gravesend Borough Council

CONSULTATION AND MITIGATION BY DESIGN

- 7.1 **Table 7.1** summarises the consultation comments received from Gravesham Borough Council through the Scoping Opinion process in respect of the townscape, visual and built heritage assessment and the responses to demonstrate where the comments have been addressed within the assessment.
- 7.2 The TVIA has been prepared in accordance with the Scoping Report and Scoping Opinion as amended through the further consultations. It has also had regard to the EIA Consultee Responses relevant to the assessment, including Historic England and Kent County Council Heritage.
- 7.3 It should be noted that the Scoping Opinion submitted by the Applicant considered townscape and visual, in conjunction with the separate assessment for heritage. The Applicant considered that heritage may be scoped out of the ES due to there being limited potential for likely significant effects.
- 7.4 The assessment demonstrates the magnitude of impact of the Proposed Development upon the significance of above ground heritage assets is low. A standalone Heritage Statement was prepared by Montagu Evans to assess the impact of the Proposed Development upon the significance of above ground built heritage receptors. The Heritage Statement has been submitted with the formal planning application. Where relevant, assessment by Montagu Evans of above ground heritage assets has been referenced in Chapter 13: Archaeology of the ES, prepared by the appointed archaeological consultant, Wessex Archaeology.
- 7.5 The final Proposed Development has been designed in response to the surrounding environment. The embedded mitigation incorporated into the parameter plans and design code is elucidated in the assessment sections of this TVIA, including under the sub-heading “Salient Features of the Development” in Section 8.

CONSULTEE AND FORM/DATE OF CONSULTATION	SUMMARY OF COMMENTS	WHERE IN THIS VOLUME COMMENTS ARE ADDRESSED
Scoping Opinion from Gravesham Borough Council dated 16th September 2022	The management and form of environmental impacts that might occur is likely to be affected by the phasing of the development and in particular how and when the site is cleared or remediated; what uses will remain on site at what stages; and what areas become occupied at what stage by potentially sensitive receptors. There is also potential for adjoining occupiers to be adversely affected during the construction and demolition stage and this will also need to be addressed. How such issues will need to be clearly addressed in the ES.	The impact of the Proposed Development upon townscape and visual receptors during the demolition and construction stage has been considered in this assessment at sections 8 and 9. It includes consideration of the phasing of the Proposed Development to ensure its deliverability and mitigate the intensity of impacts.
	The applicant is therefore advised to engage with the LPA to agree the area to be covered by the visual impact assessment and a list of those heritage assets/townscape/river views that should be considered. In terms of river views, the applicant is also reminded in policy terms that both marine and terrestrial policies will apply when the application is assessed. The applicant is also advised to agree of list of designated/non-designated/archaeological assets with the LPA, HE and the KCC for inclusion in that chapter of the ES.	A list of viewpoints was issued to the Council on 14th July 2022. The Council confirmed the selected viewpoints were acceptable via email correspondence on 26th July, plus requested adding the following additional viewpoints: • From tilbury fort • From the River by Gravesend • From the River by Greenhithe/Swanscombe • Lower Road / Stonbridge Road junction by the cottages • Bottom of Stonebridge Road • Top floor of Wallis Park Views from Tilbury Fort are provided at section 9 (views 2 and 16). Visibility from the two riverside locations (Nos. 2 and 3 by the Council) is clarified through the preparation of a zone of theoretical visibility at section 2. Non-verified massing studies prepared by Eb7 using LiDAR from Gravesend town centre (including from the riverfront) are also provided as part of this assessment. The views from close proximity (Nos. 4 and 5) are not included as verified views, owing to the fact that these would be prepared as wire lines of maximum parameters only. Views from such close proximity would not be easily legible when prepared as wire lines. Accordingly, non-verified CGIs of the illustrative scheme are prepared in the Design and Access Statement that provide a visual understanding of these potential relationships – these are for information only and do not form the basis of assessment. The view from the top floor of Wallis Park is not provided, as this TVIA considers publicly accessible vantage points only. It should be noted that the assessment does not comprise a 'residential amenity assessment', which considers private viewpoints from residential properties. This is separate from townscape and visual assessment (refer to GLVIA3, paragraph 6.17).
	See comments under Historic England response for duplicate responses.	N/A
Kent County Council Heritage Consultation Response letter dated 24th August 2022	The ES should include consideration of potential positive benefits of the scheme to learn more about the heritage of the site and the opportunities to promote and communicate this heritage to residents and visitors	Opportunities to promote and communicate the heritage of the site are outlined as part of the assessment at section 8, and in the submitted Design and Access Statement.
	See comments under Historic England response for duplicate responses.	N/A
Historic England Consultation Response letter dated 6th September 2022	The Scoping Report separates archaeology (which is taken to be below-ground assets) and built heritage (which is taken to be above-ground assets). This separation of 'above' and 'below' ground heritage assets is inappropriate in this case. Despite this contradictory information, Historic England understand that it is not proposed to scope in built heritage to the ES and that a TVIA would be produced and appended to the ES. While we acknowledge that the effects in EIA terms on nearby designated built heritage could be low, we do not agree that this means it should be scoped out of the ES as the information available at this stage is not sufficient to make this assessment with any certainty.	Further detail of the Proposed Development is provided as part of the submitted planning application and Environmental Statement. This includes, but is not limited to, the preparation of accurate visual representations, non-verified massing studies and a zone of theoretical visibility. The assessment demonstrates the magnitude of impact of the Proposed Development upon the significance of above ground heritage assets is low. A standalone Heritage Statement appended to this Volume 2 of the ES was prepared by Montagu Evans to assess the impact of the Proposed Development upon the significance of above ground built heritage receptors. The Heritage Statement has been submitted with the formal planning application. Where relevant, assessment by Montagu Evans of above ground heritage assets has been referenced in Chapter 13: Archaeology of the ES, prepared by the appointed archaeological consultant, Wessex Archaeology.
	The 1km study area has been used for both archaeological remains and built heritage. Historic England agree that the 1km study area is likely to be proportionate for the below-ground archaeology topic, however we also think that the 1km study area for built heritage is far too restrictive for a development of this scale. We suggest this must be significantly enlarged and should include, but not be limited to, the following: – Tilbury Fort, a scheduled monument and the grade II* listed Riverside Terminal – designated heritage within the town of Gravesend, including conservation areas like Windmill Hill and listed buildings like the grade II* listed Church of St George We would expect the assessment to clearly demonstrate that the extent of the proposed study area is of the appropriate size to ensure that all heritage assets likely to be affected by this development have been included and can be properly assessed.	The separate Heritage Statement considers a study area beyond 1km from the site. This is informed by a Zone of Theoretical Visibility (ZTV) that has been produced to outline the potential areas where the Proposed Development may be visible. The ZTV extends to Gravesend town centre, as requested by the Scoping Opinion (Figure 2.1). The ZTV has been produced using topographically referenced 3D models from LIDAR software. It is a tool for a high-level understanding of the extent of visibility, which was further interrogated through review of individual viewpoints using field surveys and digital software. As a minimum, the wider study area considers the impact of the Proposed Development upon: Tilbury Fort, the Riverside Terminal, Gravesend Riverside Conservation Area, Windmill Hill Conservation Area, the Church of St George.

Table 7.1 Summary of Consultation

Gravesham Borough Council

8.0

ASSESSMENT: TOWNSCAPE

NORTHFLEET HARBOURSIDE

Gravesham Borough Council

ASSESSMENT: TOWNSCAPE

- 8.1 This section assesses the effect of the Proposed Development on the townscape character areas identified in **Table 5.1**.
- 8.2 A qualitative assessment is provided below. A summary of the effects arising from impacts to townscape receptors is provided at **Table 8.1**.
- DEMOLITION AND CONSTRUCTION
- 8.3 The site would be enclosed with hoardings during the demolition of the existing structures on the site, which will provide a visual buffer at ground level to the immediate environment. The phase will, however, result in increased noise, vibration, dust and traffic in the surrounding area. The magnitude of this impact will be experienced within close proximity to the site, in particular on Stonebridge Road, Grove Road and Lower Road. This would have an adverse impact to the character, function and appearance of character areas 1, 2, 3, 4 and 5. Notwithstanding, the magnitude of impact would be low due to the temporary nature of the works. Much of the surrounding streetscape has been used for industrial use in the past. Lorries and construction vehicles are a common phenomenon in this part of Northfleet, and their presence would not compromise the quality of the residential streetscape which exist within Character Areas 2 and 3.
- 8.4 The continued functioning of the local area during the phase is an important consideration to the vitality of the townscape. Construction vehicles, comprising ready-mix lorries, articulated low loaders, plant delivery and rigid vehicles, would have an adverse impact on the function of the townscape in the immediate area. The Transport Assessment submitted with the planning application provides mitigation measures to reduce the disruption caused by construction and site preparation. The logistic management team would organise and plan prescribed delivery times to ensure that busy roads do not become congested with frequent material deliveries.
- 8.5 External works including public realm landscaping would commence towards the end of the construction phase. The works would demonstrably improve the site and connections to the surrounding area.

- 8.6 The standard environmental controls required under legislation and best practice guidance would be met as a matter of course. In order to further mitigate the impact of demolition and construction to the immediate area the Applicant may enter into a 'Considerate Constructors' scheme to ensure best practice. Mitigation and monitoring measures would be secured and controlled through an appropriate Construction Environmental Management Plan (CEMP) based on the CEMP submitted with the planning application. This may be secured through condition.
- 8.7 The CEMP will need to be mindful of the operation for nearby cumulative developments to ensure minimal impact to the continued function of the area during the demolition and construction phase.
- 8.8 The magnitude of impact will be **Low** and overall, the demolition and construction residual effects are **Minor Adverse** to all character areas. The likely effect is local level, over a short to medium term. This likely effect is not significant.
- 8.9 Across longer distances, the demolition and construction phase of the Proposed Development is likely to manifest only in cranes, visible from the surrounding character areas. The cranes will be new elements within the view. The duration of the effects is considered to be short to medium-term and reversible.

SALIENT FEATURES OF THE DEVELOPMENT

- 8.10 This document refers to the parameter plans which inform the relevant assessments of receptors. The principles determined by the parameter plans are underpinned by the illustrative material set out in the Design and Access Statement prepared by the architects; however, the illustrative masterplan is *only* illustrative and does not form the basis of assessment. The architectural quality and urban design benefits is to be secured through subsequent reserved matters applications. Those applications must accord to the Design Code submitted with this proposal, which is a control document and has informed the assessment.
- 8.11 In summary, the scheme seeks to deliver an urban quarter laid out around the new stadium for Ebbsfleet United FC with public spaces and a river promenade that will be accessible for new residents and the existing community. The Proposed Development sits between the existing neighbourhoods of Northfleet at Robinson Way and the High Street and the River Thames to the east, Swanscombe Marshes to the north and the railway lines to the south. It also abuts the Bellway development scheme to the east of Grove Road.

- 8.12 Northfleet Harbourside is connected via Stonebridge Road and Thames Way to the wider area. Northfleet train station and Ebbsfleet International train station are nearby.

SITE LAYOUT

- 8.13 The key feature of the Proposed Development is the new stadium for Ebbsfleet United at the heart of the site, surrounded by a mixed used quarter, residential neighbourhoods and open green space connecting with Swanscombe Marshes (Power Park) and the river (Riverwalk Gardens). The Boulevard, Habourside Plaza and The Market Place, a pedestrianised shopping area including cafés, bars and other leisure attractions, connects the site with the existing communities to the south and southeast.
- 8.14 The Design Code demonstrates how the Proposed Development is anticipated to create a varied townscape around the stadium, providing a series of character areas that respond to the specific conditions around the site.

MASSING AND HEIGHT

- 8.15 All plots relate to the surrounding existing townscape, particularly the traditional town centre character area (Character Area 2) directly opposite and the adjoining 20th century housing areas (Character Area 3) and the emerging context, including schemes in the cumulative tier 1 and 2 scenarios.
- 8.16 The wider area falls within the Northfleet Embankment and Swanscombe Peninsula East Opportunity Area (SPEOA), identified in the Core Strategy as one of four opportunity areas in Gravesham with significant development opportunities. The two railway stations and local bus routes give access to the Proposed Development and support high density living as set out and supported by the core strategy. Therefore a cluster of taller buildings are proposed which are considered to be appropriate to the location, mindful of the limited townscape sensitivities in the surrounding area and the emerging townscape context anticipated through the development plan.
- 8.17 The tallest buildings are concentrated in three locations. Taller buildings mark the stadium (Plots 4 and 5, 71.42 AOD (m)). Taller buildings are clustered at the end of Riverwalk Gardens along the riverfront (Plots 11 and 12, 71.42 AOD (m)) and at Power Park (Plots 17 and 18, 71.42 AOD (m)), offering views across the green spaces and the River Thames. Development steps down towards the site boundary and the adjoining existing buildings at Robinson Way and Stonebridge Road, where buildings are between 12.32 AOD (m) and 39.42 AOD (m).

- 8.18
- The proposed heights for Northfleet Harbourside would complement existing buildings and those on the adjoining development sites. The proposed heights stem from an analysis of long, medium and immediate views which are drawn from the journey through the site, and along the surrounding roads (notably Stonebridge Road and Grove Road).
- 8.19
- Any assessment of acceptability must be made on the basis of the effects of the development as a whole, and the way that tall building development interacts with the site and surrounding development. The proposals have been rigorously tested within a virtual model, taking account of the principal ways in which the site would be experienced.
- 8.20
- The modelled views illustrate that the tall buildings create a new waterfront for Northfleet at the end of the route across the site. Overall, the roofline appears continuous, embedding the site into the wider Kent landscape.

PUBLIC SPACE

- 8.21
- The proposals envisage the delivery of a series of public open spaces. Parkland, play areas, productive landscapes and hard surface areas will be able to support residents and visitors.
- 8.22
- Riverwalk Gardens and Power Park are the key spaces which would provide opportunities of animation and community interaction with landscaped elements. The proposed design of these space would create a verdant experience for the development and Northfleet as a whole. The landscape design offers the opportunity to integrate a heritage strategy that brings the industrial history of the area back to life.

ELEVATIONAL TREATMENT

- 8.23
- The appearance and character of the different elements that constitute Northfleet Harbourside are not subject of the scope of this outline planning application and the parameter plans it contains. A Design Code specifies the design ambitions for the entire site. The detailed design will be assessed via future Reserved Mattes Applications.
- 8.24
- In summary the Proposed Development would be robustly articulated with a material palette and design features that would be sustainable and complementary to the surrounding townscape. The Proposed Development would be read as several distinct elements, each with their own individual expression, albeit having a consistent architectural language. These principles are set out in the Design Code in Chapter C Character Areas and the following sections.

- 8.25
- The Design Code ensures that Northfleet Harbourside would make a positive contribution to the existing community, enabling development in unison with the emerging schemes on the adjacent sites.

OPERATION IMPACTS AND EFFECTS

CHARACTER AREA 1: MIXED-USE/COMMERCIAL ESTATE

- 8.26
- The site straddles Character Areas 1 and 5, in close proximity to Character Area 2, 3 and 4. To the east it overlooks the River Thames (Character Area 6). Character Area 1 comprises a variety of uses, including the Ebbsfleet United Football Club. The site has the ability to accommodate this type of development. For these reasons, the character area is judged to have a **Low susceptibility** to the proposed development and this results in a **Low** sensitivity.
- 8.27
- The scheme would improve the baseline situation and provide a new mixed-use neighbourhood providing up to 3,500 homes and associated green spaces, a new stadium, retail, community and leisure uses. The Proposed Development would complement the existing communities to the west and south and the emerging residential developments along Grove Road.
- 8.28
- The Proposed Development would fundamentally alter the appearance of the character area and introduce new uses. It would have a **High** magnitude of impact to this character area. It would provide a demonstrable improvement to the character, appearance and function of the surrounding townscape. The Proposed Development would give rise to **Moderate Beneficial** effects. This likely effect is significant and long-term.

CHARACTER AREA 2 AND 3: TRADITIONAL TOWN CENTRE AND 20TH CENTURY HOUSING

- 8.29
- Character Areas 2 and 3 comprise pockets of early 20th century traditional terraces and residential neighbourhoods that date from the second half of the 20th century. Grove Road, Stonebridge Road and Thames Way dissect the area and form barriers between the different existing communities. Currently occupied by various industrial and commercial buildings, surrounded by large tarmac surfaces and the football stadium, the baseline situation makes a negative contribution to both receptors. The industrial activities in combination with heavy traffic and large numbers of lorries create a challenging environment lacks active frontages, planting and trees. For these reasons, the character area is judged to have a **Low susceptibility** to the proposed development and this results in a **Low** sensitivity.

- 8.30
- The Proposed Development would have a **Medium** magnitude of impact to Character Areas 2 and 3. It would provide a demonstrable improvement to the character, appearance and function of the surrounding townscape. The Proposed Development would give rise to **Minor Moderate Beneficial** effects. This likely effect is not significant and long-term

CHARACTER AREA 4: GREEN SPACE

- 8.31
- Open green spaces are located immediately to the north (Swanscombe Peninsula, which is a SSSI) and east of the site (Robins Creek). Formerly heavily industrialised land, the Character Area previously accommodated aggregate, cement and gas works, which had been active throughout the 20th century. Following the end of industrial use, nature reclaimed much of the brownfield land. Industrial activities are still prevalent in the context of Character Area 4. The high-speed railway line divides the area in two halves. Given the disparate border conditions and the proximity to industrial activities, the character area is judged to have a **Low susceptibility** to the proposed development and this results in a **Low** sensitivity.
- 8.32
- The Proposed Development would have a **Low** magnitude of impact. It would provide a demonstrable improvement to the character, appearance and function of the surrounding townscape. The Proposed Development would give rise to **Minor Beneficial** effects. This likely effect is not significant and long-term.

CHARACTER AREA 5: INDUSTRIAL

- 8.33
- Character Area 3, comprising the industrial buildings, tarmac areas and ancillary facilities, stretching along the riverfront at Northfleet. The site partially falls into Character Area 3.
- 8.34
- The experience of the character area is derived from those travelling in road vehicles to shop or on their way to work. Such an experience is characterised by a road infrastructure, car parks and large industrial sheds. Dwell times in the character area are limited, except for workers, and concentration will be on indoor activities within predominantly windowless buildings. As a result, the character area has a **Low susceptibility** to change and the receptor has a **Low sensitivity**.

- 8.35
- The proposals would introduce an attractive high-quality streetscape into the views (Views 1 and 10). High quality public space and landscape design would improve Grove Road and Stonebridge Road and the boundary with the surrounding character areas. The proposed development would have a **High** magnitude of impact to the receptor.
- 8.36
- The Proposed Development would provide a demonstrable improvement to the character, appearance and function of the surrounding townscape. The Proposed Development would give rise to **Moderate Beneficial** effects. This likely effect is long-term and significant.

CHARACTER AREA 6: RIVER THAMES

- 8.37
- The River Thames and the embankment fall into Character Area 6 which forms the eastern boundary of the site. The character area allows for long views across the river towards Essex and views back the north bank towards the site. The industrial buildings of Character Areas 1 and 5 frame the river. Given the proximity to industrial activities, the character area is judged to have a **Low susceptibility** to the proposed development and this results in a **Low** sensitivity.
- 8.38
- The Proposed Development would fundamentally alter the appearance of the character area and introduce new uses. It would have a **Medium** magnitude of impact to this character area. It would provide a demonstrable improvement to the character, appearance and function of the surrounding townscape. The Proposed Development would give rise to **Minor Moderate Beneficial** effects. This likely effect is not significant, long-term and permanent.

CUMULATIVE

TIER 1 CUMULATIVE ASSESSMENT

- 8.39
- The cumulative tier 1 scenario would not change the effect of the Proposed Development. The cumulative schemes work successfully with the Proposed Development, achieving the wider regeneration of the area in line with the ambitions of the development plan. In the cumulative context the magnitude of effect would remain as proposed.

TIER 2 CUMULATIVE ASSESSMENT

- 8.40
- The tier 2 cumulative scenario includes the London Resort development. The proposals for this scheme are not subject to a valid planning application and so the details are not understood. The scheme withdrawal in March 2022 comprised:
Global entertainment resort with a Leisure Core (comprising a range of events spaces, themed rides and attractions, entertainment venues split over two gates), public areas outside the two gates (offering a range of retail, commercial, dining and entertainment facilities), hotels, 'Conference' Centre, Coliseum, back of house areas, related housing, access road from the A2(T) (including junction works), people mover, river transport infrastructure at both Swanscombe Peninsula and Port of Tilbury, car parking, energy centre, waste water treatment works, land remediation and terrain modelling, flood defence and drainage works, habitat creation and all associated works.
- 8.41
- The aspiration for the site is for comprehensive redevelopment with a high-density residential-led scheme. The change will be transformational for the townscape of the area. This would give rise to a higher magnitude of effect upon the site and land to the east. The overall effect would be Major and Beneficial to townscape character area 1. This likely effect is significant and long-term.
- 8.42
- The London Resort development covers large swathes of character area 4, which generally comprises green space. The quality of this space varies across the character area and has been significantly changed following the arrival of the Ebbsfleet International Station. Again, the proposals for this scheme are not subject to a valid planning application and so the details are not understood, thus therefore it is not possible to provide a definitive assessment of the cumulative impact. However, subject to the retention of the protected nature reserves, the proposals have the potential to be beneficial. The magnitude of impact would be High and the overall effect Moderate Beneficial. This likely effect is significant and long-term.

SECTION SUMMARY

- 8.43
- The assessment on townscape receptors is summarised in **Table 8.1** below.

MAP REF	NAME	TOWNSCAPE VALUE	SUSCEPTIBILITY TO CHANGE	SENSITIVITY	MAGNITUDE OF IMPACT (DEMOLITION AND CONSTRUCTION)	LIKELY EFFECT (DEMOLITION AND CONSTRUCTION)	MAGNITUDE OF IMPACT (COMPLETED DEVELOPMENT)	LIKELY EFFECT (COMPLETED DEVELOPMENT)	LIKELY EFFECT (CUMULATIVE TIER 1)	LIKELY EFFECT (CUMULATIVE TIER 2)
1	Mixed-use/commercial estate	Low	Low	Low	Low	Minor Adverse	High	Moderate Beneficial	Moderate Beneficial	Major Beneficial
2	Traditional town centre	Medium	Low	Low	Low	Minor Adverse	Medium	Minor Moderate Beneficial	Minor Moderate Beneficial	Minor Moderate Beneficial
3	20th century housing	Medium	Low	Low	Low	Minor Adverse	Medium	Minor Moderate Beneficial	Minor Moderate Beneficial	Minor Moderate Beneficial
4	Green Space	Medium	Low	Low	Low	Minor Adverse	Low	Minor Beneficial	Minor Beneficial	Moderate Beneficial
5	Industrial	Low	Low	Low	Low	Minor Adverse	High	Moderate Beneficial	Moderate Beneficial	Moderate Beneficial
6	River Thames	Medium	Low	Low	Low	Minor Adverse	Medium	Minor Moderate Beneficial	Minor Moderate Beneficial	Minor Moderate Beneficial

Table 8.1 Summary of likely effects on townscape receptors. Effects which are significant are highlighted in the blue boxes.

Gravesham Borough Council

9.0 ASSESSMENT: VISUAL

NORTHFLEET HARBOURSIDE

Gravesend Borough Council

ASSESSMENT: VISUAL

9.1 This section assesses the likely effect of the Proposed Development on the visual receptors identified in **Table 6.1**. For ease of reference the View Location Plan is re–provided at the start of this section (**Figure 9.1**).

DEMOLITION AND CONSTRUCTION

- 9.2 ES Volume 1 Chapter 5 sets out the anticipated programme of works and the key activities that would be undertaken during demolition and construction necessary to facilitate the Proposed Development.
- 9.3 During the demolition and construction phase the nearby pockets of housing estates to the south and west of the site would experience a Minor Adverse effect. In areas closest to the site, such as 8, 13 and 15, the intensity of the impact would increase and the effect would be Minor to Moderate Adverse. This would arise from the appearance and experience of construction activity on the Site (including tall equipment, noise, construction traffic movement and temporary buildings). The duration of the construction period would be relatively long, although is temporary and reversible (leading to the Proposed Development) which reduces the overall magnitude of impact. The residential areas would also benefit from the phased approach to construction which would reduce the intensity of construction traffic and impact upon visual amenity.

CUMULATIVE

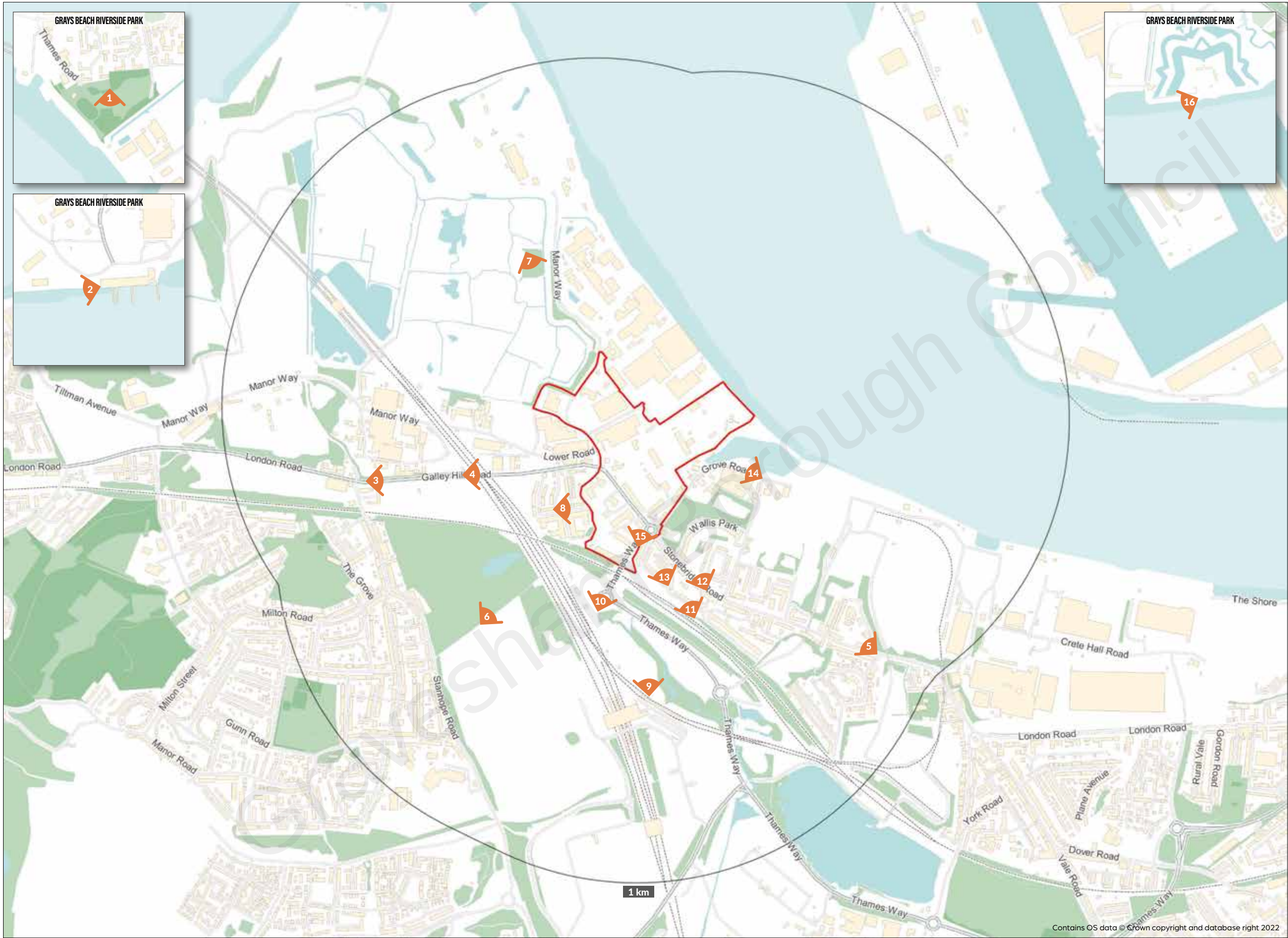
TIER 1 CUMULATIVE ASSESSMENT

- 9.4 An assessment of the additional effects of the Proposed Development on top of the tier 1 cumulative baseline is provided alongside each reciprocal view in this section.

TIER 2 CUMULATIVE ASSESSMENT

- 9.5 An assessment of the additional effects of the Proposed Development on top of the tier 1 cumulative baseline is provided herein, mindful that this is a qualitative assessment due to these schemes not being subject to formal planning applications.
- 9.6 The tier 2 cumulative scenario includes the London Resort development. The proposals for this scheme are not subject to a valid planning application and so the details are not understood. However, the aspiration for the site is for comprehensive redevelopment with a high–density residential–led scheme. The change will be transformational for the townscape of the area, including green space to the north and east of the site.
- 9.7 It is envisaged that the protected nature reserves would be retained. The visual amenity from areas near representative view 7 would therefore remain unchanged. From locations such as view 6 the area would undergo significant change. This is likely to give rise to a High magnitude of impact and the overall effect would be The magnitude of impact would be High and the overall effect would be Moderate to Major Beneficial.

COMPLETED DEVELOPMENT



VIEW LOCATION PLAN

-  Application Site
1. Riverfront at Gray's Beach End
 2. Tilbury Fort
 3. Galley Hill Road / High Street junction
 4. Galley Hill Road rail intersection
 5. High Street / Lawn Road junction
 6. Walkway between Stanhope Road and train tracks (looking east)
 7. Green Space to the west of Manor Way (looking south)
 8. Robinson Way / Black Eagle Drive junction
 9. Ebbsfleet International Car Park C (looking north)
 10. Thames Way roundabout
 11. Station Road
 12. Stonebridge Road (looking north)
 13. Railway Street / Hamerton Road junction
 14. The Creek / Grove Road
 15. Grove Road / Stonebridge Road roundabout
 16. Tilbury Fort Quay

LOCATION:
Northfleet Central

DATE:
September 2022

SCALE:
1:12,500 @ A3

FIGURE 9.1 View Location Plan

 **NORTH**



MONTAGU EVANS
CHARTERED SURVEYORS
70 ST MARY AXE,
LONDON, EC3A 8BE
T: +44 (0)20 7493 4002
WWW.MONTAGU-EVANS.CO.UK

VIEW 1: GRAY'S BEACH RIVERSIDE PARK - PIER**EXISTING**

- 9.8 View 1 is located approximately 1.9 km to the north of the site on the northern bank of the Thames, south of Gray's Beach Riverside Park. It is oriented to the south towards the site.
- 9.9 The view comprises the river Thames in the foreground and mid-ground, there are some industrial structures to the left of the view comprising the grain factory.
- 9.10 In the background, across the Thames, lies the site which continues the industrial character through chimneys and warehouses which are set along the coastline. The buildings in the background of the view are largely low-rise and span large areas. The countryside is visible beyond the site to the very back of the view and electricity pylons are clearly visible as some of the tallest elements on the southside of the river Thames.
- 9.11 The value attached to the view is Low.
- 9.12 The view would primarily be experienced by users of the park and sometimes pedestrians.



PROPOSED

- 9.13 The Proposed Development is shown in the view as white chalk render, indicating the maximum parameter plans.
- 9.14 From this location, the Proposed Development will be visible behind the large footprint sheds, embedded in the industrial landscape that stretches out along the riverbanks. The Development would be seen as part of the wider panorama against the higher parts of Kent. It would give rise to a readily perceptible change to the view and marked increase in intensity of the Site. The tall chimney to the west of the Site remains the tallest structure in this view.
- 9.15 The change in scale will create a focal point within the view. The variations in height create an attractive skyline that adds visual interest to the riverfront. Tall slender buildings mark the waterfront, where the Riverwalk Gardens open up onto the River Thames. Gaps between the blocks allow views through to the Kent countryside behind.
- 9.16 The area is undergoing substantial change as set out in the development plan. The visual receptors have a **Low** susceptibility to change and **Low** sensitivity. The magnitude of impact would be **Medium**.
- 9.17 The Proposed Development would give rise to a **Minor to Moderate** likely effect. The effect is not significant.
- 9.18 The overall Scale of Effect would be Minor to Moderate. The effect would be **Beneficial**. The effect is permanent, long-term and of a regional scale.



CUMULATIVE (TIER 1)

- 9.1 The cumulative tier 1 scenario would not change the effect of the Proposed Development. In the cumulative context the magnitude of effect would remain **Minor to Moderate Beneficial** effect. The effect is not significant, permanent and long-term.



Gravesham Borough Council

VIEW 2: TILBURY FORT

EXISTING

- 9.2 View 2 is located approximately 3.35 km to the east of the site on the southern boundary of Tilbury Fort. It is oriented towards the west and the site.
- 9.3 The foreground of the view is occupied by the car park at Tilbury Fort, enclosed by the sea defence wall which limits the views across the river. The site is not discernible within the view. There are low rise buildings in the mid-ground and wind turbines and shipping containers at Tilbury Docks at some distance.
- 9.4 The Fort's defence walls are visible to the right. Water Gate, the main entrance to the Fort, is visible behind the cars. Its richly detailed Baroque façade faces onto the River Thames. The roofs and turret of the Riverside Station at Tilbury Docks is discernible to the left of the wind turbines.
- 9.5 The value attached to the view is Medium.
- 9.6 The view would primarily be experienced by visitors to the fort, particularly those using the car park and pedestrians who use the route for leisure walks.



PROPOSED

- 9.7 The Proposed Development is shown in the view as white chalk render, indicating the maximum parameter plans.
- 9.8 The Proposed Development will be barely visible in the background of the view, heavily obscured by interposing development, the wind turbines, Riverside Station, vegetation and structures within the perimeter of Tilbury Fort. The visual receptors are judged to have a **Medium** susceptibility to change, resulting in a **Medium** sensitivity. The magnitude of impact would be **Low**.
- 9.9 The Proposed Development would give rise to a **Minor to Moderate** Likely effect. The effect is significant.
- 9.10 The overall Scale of Effect would be **Minor to Moderate**. The effect would be Neutral.



CUMULATIVE (TIER 1)

- 9.11 The cumulative tier 1 scenario would not change the effect of the Proposed Development. In the cumulative context the magnitude of effect would remain Minor to Moderate Beneficial effect. The effect is significant, permanent and long-term.



Gravesham Borough Council

VIEW 3: GALLEY HILL ROAD / HIGH STREET JUNCTION**EXISTING**

- 9.12 View 3 is located approximately 913 m to the west of the site at Galley Road Hill near the Church of All Saints. It is oriented to the east and the site.
- 9.13 The view comprises Galley Hill Road in the foreground leading towards the site, framed by pavement and low brick walls. There is some greenery lining the road and a bus stop. The road slopes down towards the east, and the electrical pylons can be seen in the background of the view as well as wind turbines which both rise above the buildings within the view and create a cluster of tall structures at the centre of the view near the site.
- 9.14 There are industrial buildings located within the centre of the view partially occluded by the pylons. Road infrastructure and the tall pylons dominate the view.
- 9.15 The value attached to the view is Low.
- 9.16 The view would primarily be experienced by road users and sometimes pedestrians, both using the road in transit.



PROPOSED

- 9.17 The Proposed Development is shown in the view as white chalk render, indicating the maximum parameter plans.
- 9.18 The Proposed Development would introduce a new piece of townscape with a varied skyline of slender building blocks appearing above the greenery that flanks Galley Hill Road. Visual receptors are primarily road users. The susceptibility to change would be **Low**. The receptors would have an overall **Low** sensitivity.
- 9.19 The magnitude of impact is considered to be Medium to the visual receptors, whose focus would be on traffic on Galley Hill Road and wayfinding. The beneficial impacts of the wider regeneration of the area will be made tangible by the new development.
- 9.20 Based on the principles of the Design Code, the Proposed Development would form an attractive townscape feature in line with the objectives of the development plan. It would improve the overall function and composition of the area and the visual amenity of the view in general with high quality architecture, in accordance with the guidelines of the Design Code. Well-articulated façades and an elevational treatment developed in accordance with the history and character of Northfleet, would provide visual interest and ensure the new buildings make a positive contribution to the existing context. The architectural appearance will be controlled via Reserved Matters applications.
- 9.21 Given the beneficial impacts of the proposals discussed above, the nature of effect would have an advantageous effect to the receptor. As result, the Proposed Development would give rise to a **Minor to Moderate Beneficial** effect. These effects would be direct, long-term, permanent and not significant.



CUMULATIVE (TIER 1)

- 9.22 The cumulative tier 1 scenario would not change the effect of the Proposed Development. In the cumulative context the magnitude of effect would remain **Minor to Moderate Beneficial** effect. The effect is not significant, permanent and long-term.



Gravesham Borough Council

VIEW 4: GALLEY HILL ROAD RAIL INTERSECTION**EXISTING**

- 9.23 View 4 is located approximately 550 m to the west of the site and approximately 300 m to the east of View 3 at the intersection of Galley Road Hill and the railway below. It is oriented to the east, towards the site.
- 9.24 Galley Hill Road occupies much of the foreground and middle ground of the view. There are pavements flanking the road on the bridge. The road follows a downward slope towards the centre of Northfleet.
- 9.25 The background is dominated by large, metal sheds and older industrial machinery which, along with the wind vanes and electrical pylons, continues to enforce a vertical emphasis throughout the background of the view. Despite the greenery at Wallis Park and trees appearing between the buildings, the view has a harsh, industrial, road dominated quality.
- 9.26 The value attached to the view is **Low**.
- 9.27 The view would primarily be experienced by road users using the road in transit and sometimes pedestrians.



PROPOSED

- 9.28 The Proposed Development is shown in the view as white chalk render, indicating the maximum parameter plans.
- 9.29 From this viewpoint closer to the Site, the compositional qualities of the new piece of townscape, coupled with the high quality detailed design, would be readily discernible. Visual receptors are primarily road users. The susceptibility to change would be **Low**. The receptors would have an overall **Low** sensitivity. The magnitude of impact is considered to be Medium to the visual receptors, whose focus would be on traffic on Galley Hill Road, arrival at the ramp and general wayfinding. The beneficial impacts of the wider regeneration of the area will be made tangible by the new development
- 9.30 The Proposed Development would be visible in the background of the view, replacing and screening existing industrial buildings and structures. Based on the principles of the Design Code, the Development would form an attractive townscape feature in line with the objectives of the development plan. The massing of the Development creates a new focal point. The variation in height creates visual interest contributes to the appreciation of the view, especially considering the existing view which has little to no visual interest or attraction.
- 9.31 Well-articulated façades and an elevational treatment developed in accordance with the history and character of Northfleet, would provide visual interest and ensure the new buildings make a positive contribution to the existing context. The architectural appearance will be controlled via Reserved Matters applications.
- 9.32 Given the beneficial impacts of the proposals discussed above, the nature of effect would have an advantageous effect to the receptor. As result, the Proposed Development would give rise to a **Minor to Moderate Beneficial** effect. These effects would be direct, long-term, permanent and not significant.



CUMULATIVE (TIER 1)

- 9.33 The cumulative tier 1 scenario would not change the effect of the Proposed Development. In the cumulative context the magnitude of effect would remain **Minor to Moderate Beneficial** effect. The effect is not significant, permanent and long-term.

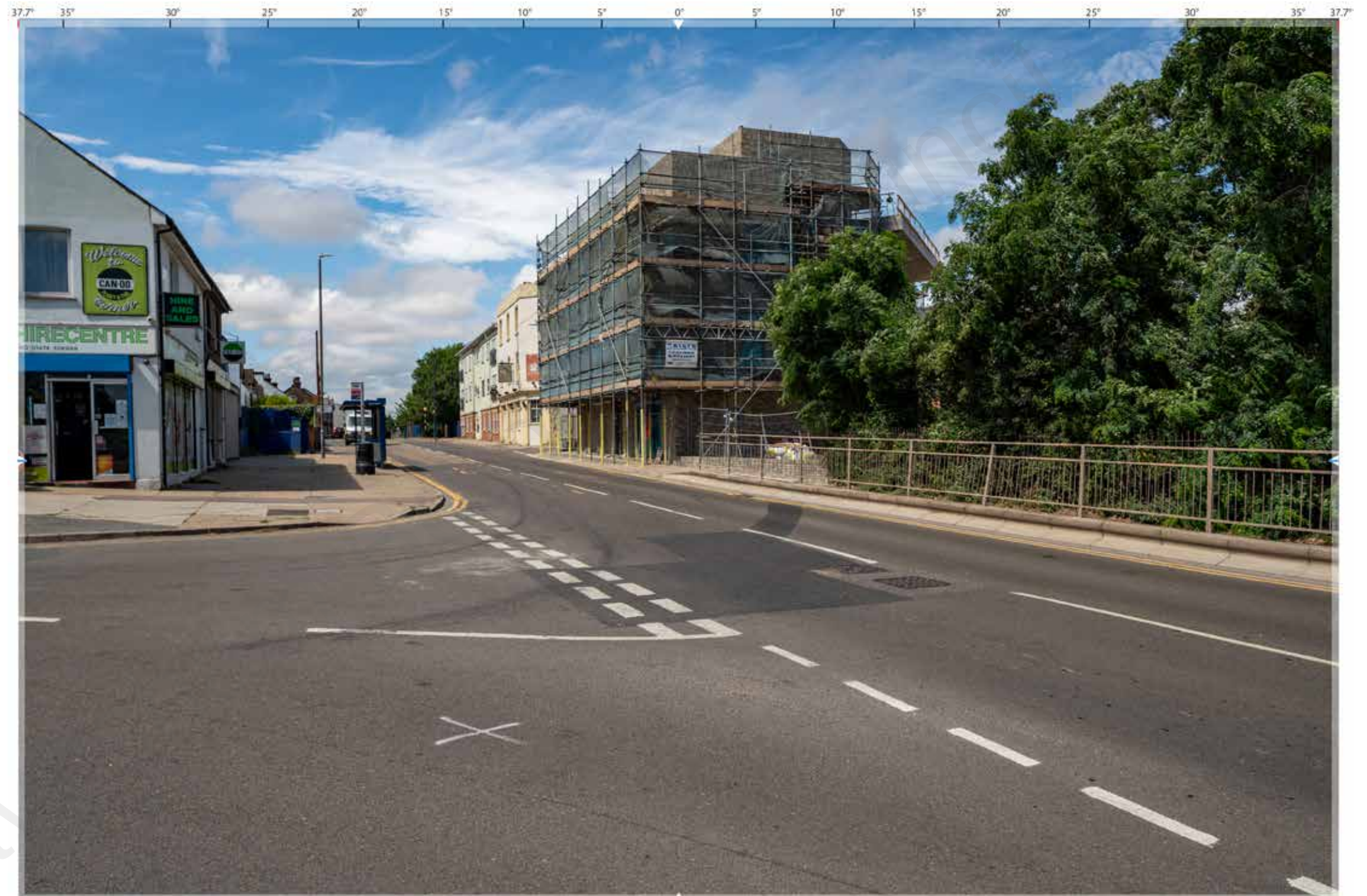


Gravesham Borough Council

VIEW 5: HIGH STREET / LAWN ROAD JUNCTION

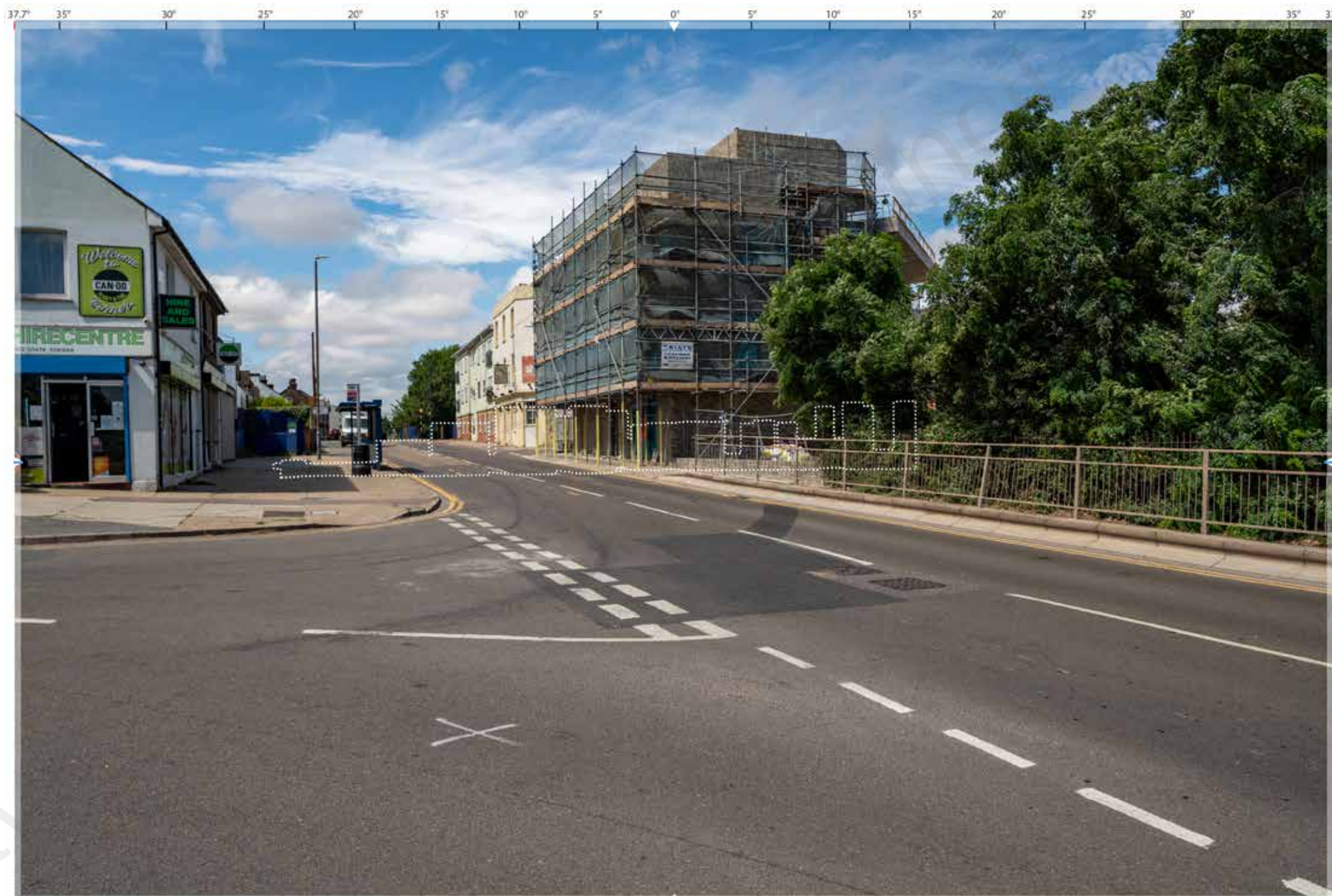
EXISTING

- 9.34 View 5 is located approximately 850 m to the southeast of the site, at the intersection between High Street and Lawn Road within Northfleet's town centre. It is oriented to the northwest along the High Street towards the site.
- 9.35 The foreground of the view is occupied by the corner of Lawn Road and the High Street. There are interspersed areas of urban greenery which mainly comprise large trees and bushes. A row of buildings flanks the High Street, those on the left are set back from the road edge and comprise commercial and retail units in the forefront and residential buildings to the rear.
- 9.36 The Edinburgh Castle Public House can be seen on the right-hand side of the view, partially obscured by a building under construction largely covered in scaffolding. The other buildings on that row comprise flats with rendered and brick elevations.
- 9.37 The view is terminated by the bend in the road and the greenery present along the High Street. The view has ample greenery, but traffic infrastructure dominates, creating a transitory character.
- 9.38 The value attached to the view is **Low**.
- 9.39 The view would primarily be experienced by local residents, commuters using the bus stop and road users.



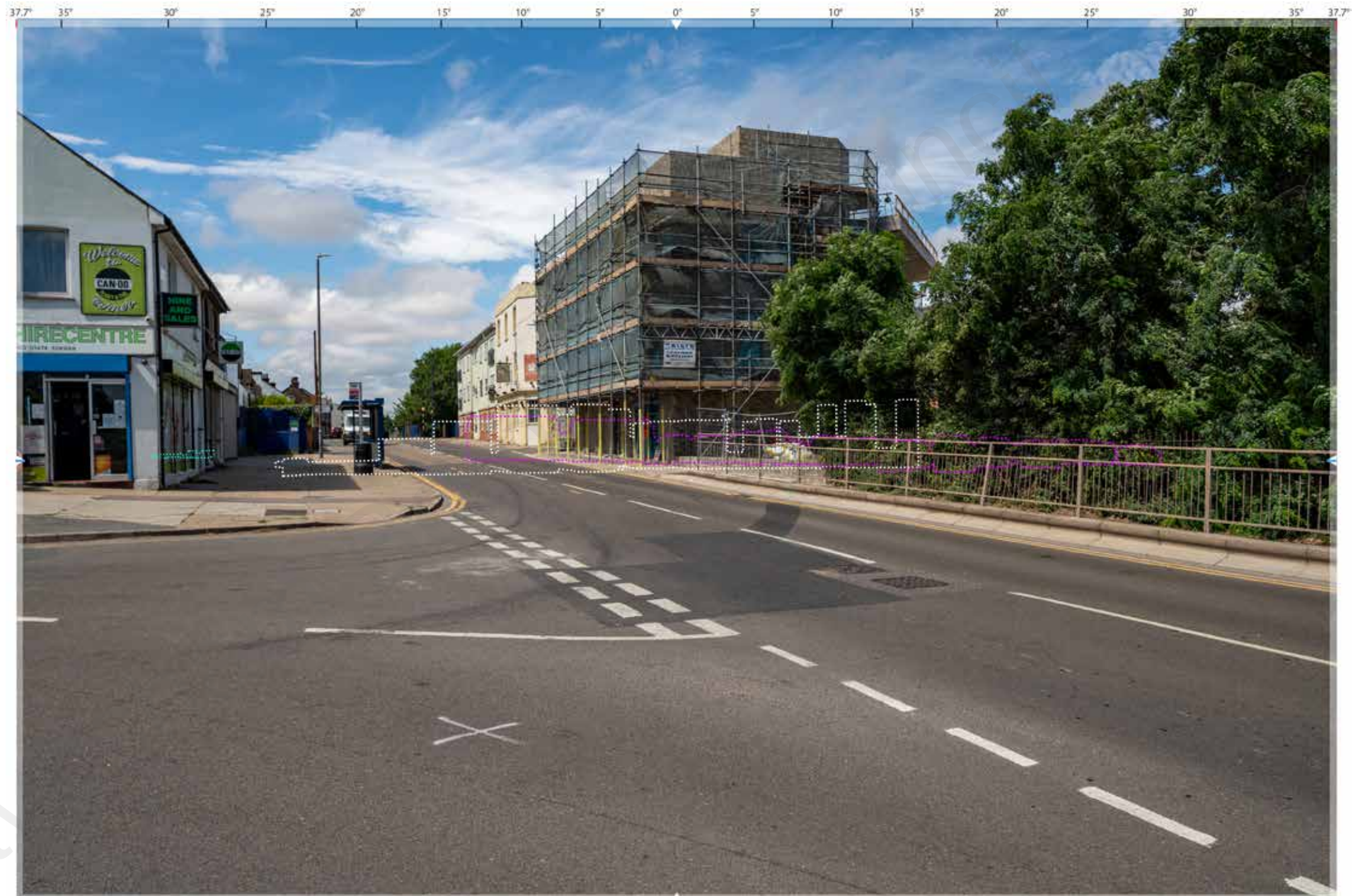
PROPOSED

- 9.40 The Proposed Development is shown in the view as white chalk render, indicating the maximum parameter plans.
- 9.41 The Proposed Development will be entirely screened by interposing development and the topography of the area. Those using the area are primarily local residents, pedestrians and road users who understand that the area that is undergoing substantial change. These visual receptors have a **Low** susceptibility to change and **Low** sensitivity. The magnitude of impact would be **Nil**.
- 9.42 The Proposed Development would give rise to a **None** Effect Likely effect. The effect is not significant.
- 9.43 The overall Scale of Effect would be **None**.



CUMULATIVE (TIER 1)

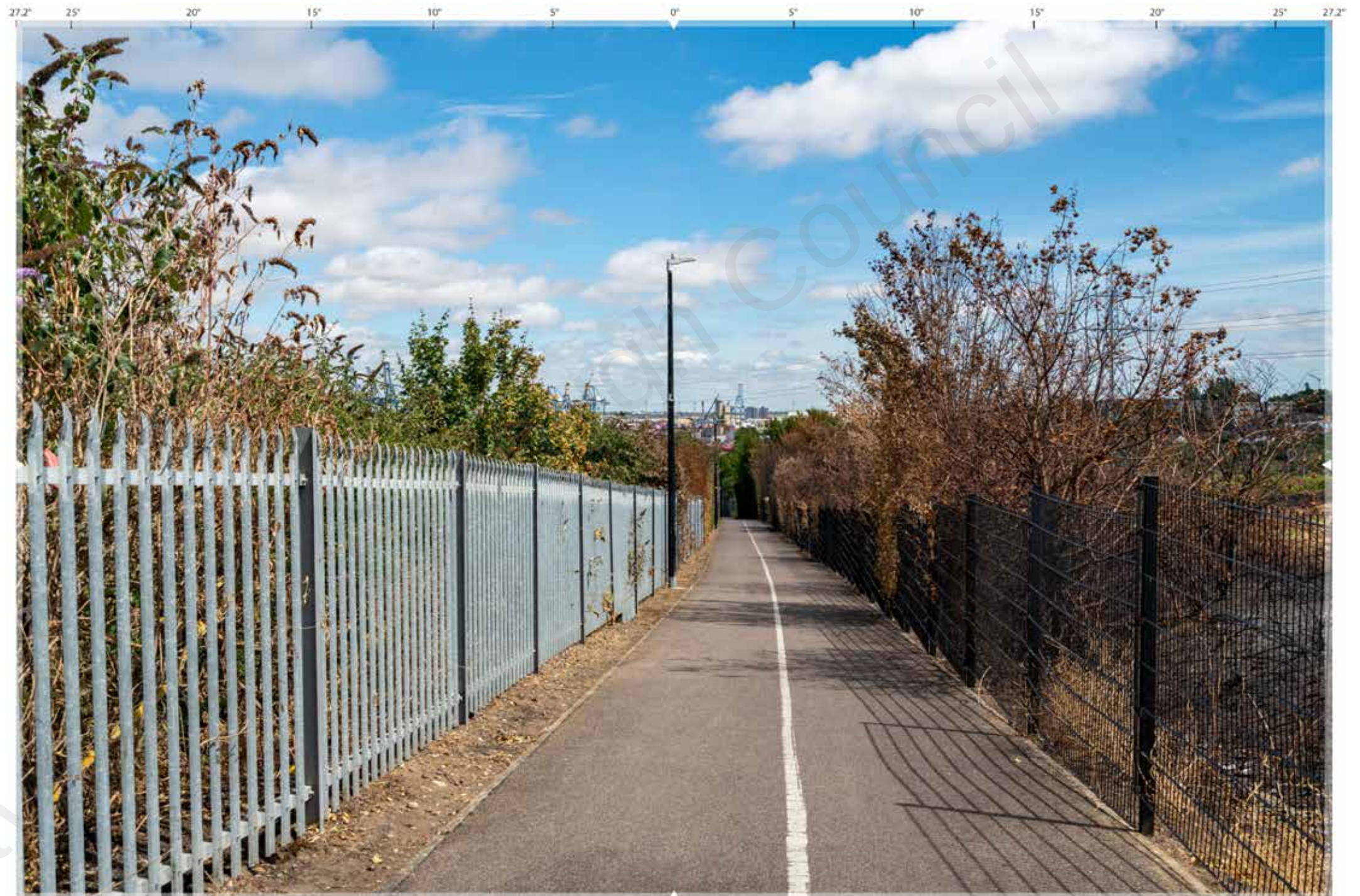
- 9.44 The cumulative tier 1 scenario would not change the effect of the Proposed Development. In the cumulative context the magnitude of effect would remain **None**. The effect is not significant, permanent and long-term.



Gravesham Borough Council

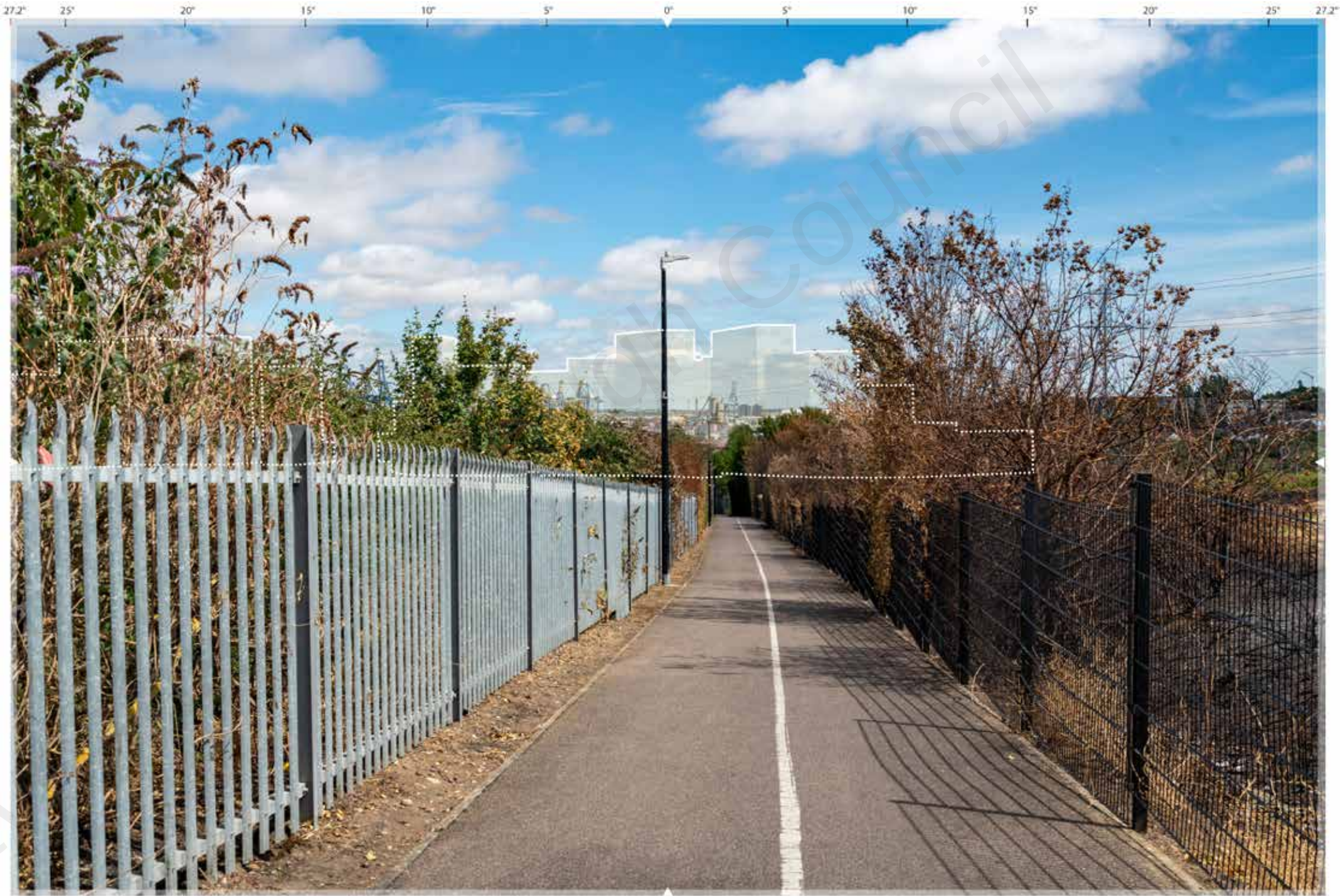
VIEW 6: WALKWAY BETWEEN STANHOPE ROAD AND TRAIN TRACKS (LOOKING EAST)**EXISTING**

- 9.45 View 6 is located approximately 465 m southwest of the site on the walkway between Stanhope Road and the train tracks. It is oriented to the northeast towards the site.
- 9.46 The walkway occupies the foreground and middle ground of the view. The walkway is flanked by trees and shrubs. It is enclosed by metal fencing and features a tarmacked walkway and streetlights.
- 9.47 The terrain slopes down towards the train tracks which are screened by greenery. In the background of the view there are pylons, electrical cables and industrial buildings and structures which can be seen above the greenery of the open space. The natural landscape of the Thames estuary is visible beyond the industrial structures.
- 9.48 Despite the greenery, the industrial character which is enforced by the enclosed appearance of the walkway and the factory buildings in the background dominates the view.
- 9.49 The view has a transitory character.
- 9.50 The value attached to the view is **Low**.
- 9.51 The view would primarily be experienced by local residents, pedestrians and users of the amenity space for dog walking or leisure purposes primarily.



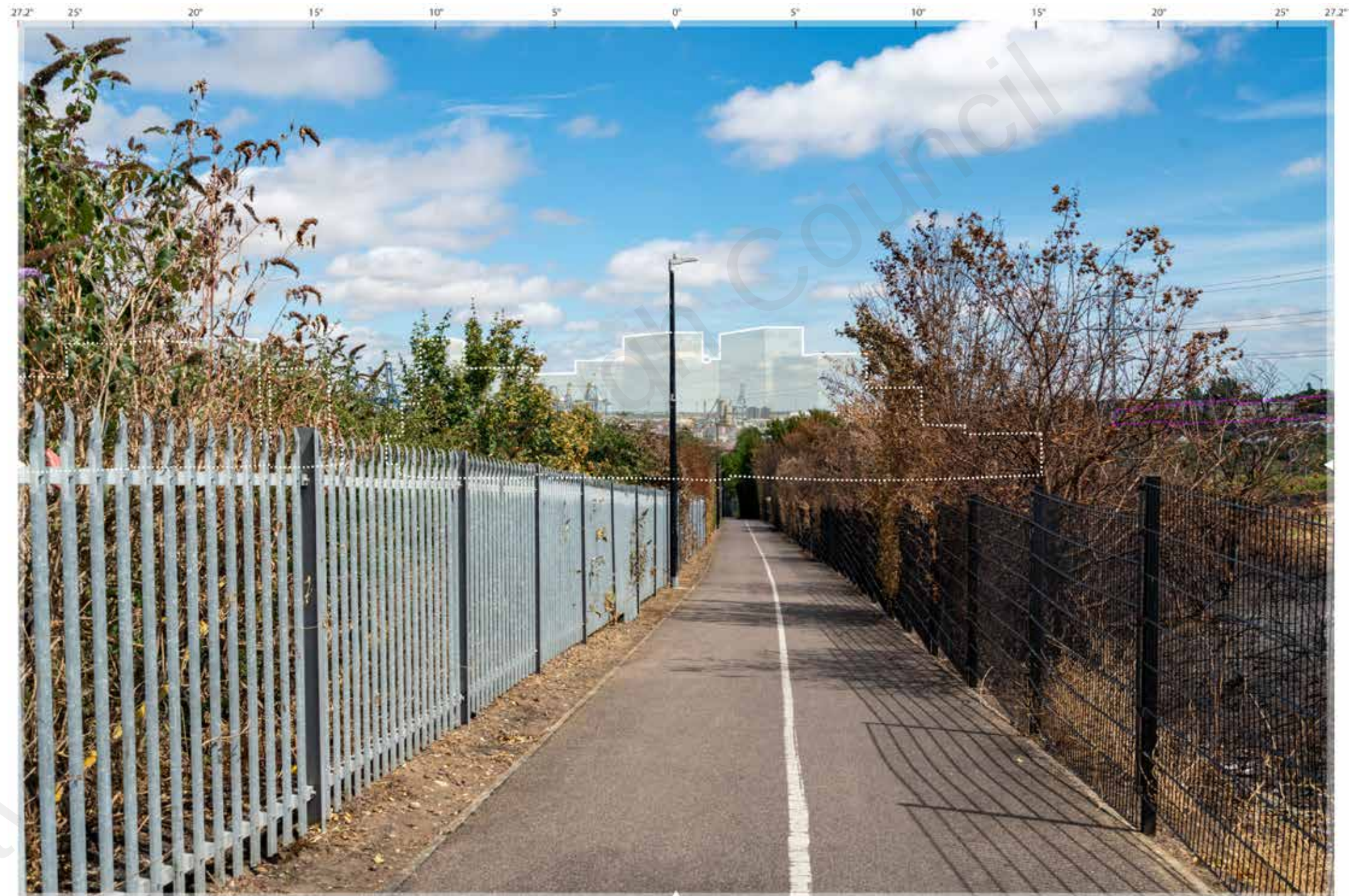
PROPOSED

- 9.52 The Proposed Development is shown in the view as white chalk render, indicating the maximum parameter plans.
- 9.53 The Proposed Development introduces a new piece of townscape. The view is focused on the building around the stadium at the heart of the Site. The visual receptors are primarily pedestrians using the footpath. The visual receptors are judged to have **Low** susceptibility to change and **Low** sensitivity. The magnitude of impact is considered to be Medium to the visual receptors, whose focus would be on traffic on Galley Hill Road and wayfinding. The beneficial impacts of the wider regeneration of the area will be made tangible by the new development.
- 9.54 Based on the principles of the Design Code, the Proposed Development would form an attractive townscape feature in line with the objectives of the development plan. The Proposed Development creates a focal point and improves wayfinding for pedestrians using the path, creating visual interest. The Proposed Development replaces the existing low rise, industrial development which does not assist wayfinding and does not create an attractive focal point in Northfleet. The variation in height creates visual interest contributes to the appreciation of the view.
- 9.55 The Proposed Development would give rise to a **Minor to Moderate** likely effect. The effect is not significant.
- 9.56 The overall Scale of Effect would be **Minor to Moderate**. The effect would be **Beneficial**. The effect is permanent, long-term and of a regional scale.



CUMULATIVE (TIER 1)

- 9.57 The cumulative tier 1 scenario would not change the effect of the Proposed Development. In the cumulative context the magnitude of effect would remain **Minor to Moderate Beneficial** effect. The effect is not significant, permanent and long-term.



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VIEW 7: GREEN SPACE TO THE WEST OF MANOR WAY (LOOKING SOUTH)**EXISTING**

- 9.58 View 7 is located approximately 647 m north of the site, in the green space to the west of Manor Way. It is oriented to the south towards the site.
- 9.59 The view comprises fields of open space in the foreground with large metal sheds and industrial structures and pylons in the middle ground of the view. A tall chimney introduces a strong vertical element. Mature trees and shrubs screen the road which travels towards the site however, the electrical pylons can be seen on the right which indicate the site's location.
- 9.60 The value attached to the view is **Low**.
- 9.61 The view would primarily be experienced by pedestrians and users of the amenity space leisure purposes primarily.



PROPOSED

- 9.62 The Proposed Development is shown in the view as white chalk render, indicating the maximum parameter plans.
- 9.63 The visual receptors of the view are pedestrians. These visual receptors have a **Low** susceptibility to change and **Low** sensitivity as a result of the remote location which is not within an established walking route or actively used area. The magnitude of impact would be **Low**.
- 9.64 The Proposed Development is visible in the backdrop of the view, while some of it is screened by interposing greenery, the scale and massing of the Development is apparent. Based on the principles of the Design Code, the Proposed Development would form an attractive townscape feature in line with the objectives of the development plan. The beneficial impacts of the wider regeneration of the area will be made tangible by the new development.
- 9.65 The massing and variation in heights creates visual interest and creates a wayfinding focal point to receptors of the view from this location. The variation in heights and massing is also complimentary to the view as it creates continuity of the built form.
- 9.66 The Proposed Development would give rise to a **Minor** likely effect. The effect is not significant.
- 9.67 The overall Scale of Effect would be **Minor**. The effect would be **Beneficial**. The effect is permanent, not significant long-term and of a regional scale.



CUMULATIVE (TIER 1)

- 9.68 The cumulative tier 1 scenario would not change the effect of the Proposed Development. In the cumulative context the magnitude of effect would remain **Minor Beneficial** effect. The effect is permanent, long-term and not significant.



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VIEW 8: ROBINSON WAY / BLACK EAGLE DRIVE JUNCTION**EXISTING**

- 9.69 View 8 is located approximately 121 m west of the site, in the green space to the west of Manor Way. It is within the immediate vicinity of the site, and it is oriented to the east towards the site.
- 9.70 21st century housing occupies the fore- and middle-ground of this view, it is constructed from pale yellow brick and comprise a mixture of apartments and terraced houses. The buildings in the view are low- to mid-rise and feature off-street and on-street parking, small areas of greenery including shrubs and pavements set within a tight-knit street network. It has a safe and residential character.
- 9.71 The background of the view shows the low-rise petrol station and Ebbsfleet FC in the centre of the background. Wind turbines rise high above the massing of the Football Club along with some mature trees.
- 9.72 The value attached to the view is **Low**.
- 9.73 The view would primarily be experienced by local residents.



PROPOSED

- 9.74 The Proposed Development is shown in the view as white chalk render, indicating the maximum parameter plans.
- 9.75 The visual receptors are primarily local residents. Views east towards the site are a contributing factor to their overall experience. The visual receptors are judged to have a **Medium** susceptibility to change, resulting in a **Medium** sensitivity given the residential nature of the area. The magnitude of impact would be **Medium**.
- 9.76 The Proposed Development would be visible in the backdrop of the view and introduce a new high quality piece of townscape. It would replace the existing buildings on the site that are commercial in character and contribute little towards the amenity of the view. Much of the Proposed Development is occluded by interposing built form in the foreground.
- 9.77 The Proposed Development would provide additional residential character to the view which compliments the existing buildings within the view.
- 9.78 The scale and height variation of the Proposed Development further compliment the buildings in the foreground of the view. The Proposed Development does not dominate or overshadow the buildings in the foreground. It instead appears to be complimentary to the context as a result of similar building heights and a varying spatial arrangement.
- 9.79 Based on the principles of the Design Code, the Proposed Development would form an attractive townscape feature in line with the objectives of the development plan. The beneficial impacts of the wider regeneration of the area will be made tangible by the new development.
- 9.80 The Proposed Development would give rise to a **Minor to Moderate** likely effect. The effect is not significant.
- 9.81 The overall Scale of Effect would be **Minor to Moderate**. The effect would be **Beneficial**. The effect is permanent, long-term and of a regional scale.



CUMULATIVE (TIER 1)

- 9.82 The cumulative tier 1 scenario would not change the effect of the Proposed Development. In the cumulative context the magnitude of effect would remain **Minor to Moderate Beneficial** effect. The effect is not significant, permanent and long-term.



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VIEW 9: EBBSFLEET INTERNATIONAL CAR PARK C (LOOKING NORTH)**EXISTING**

- 9.83 View 9 is located approximately 560 m south of the site within car park C of Ebbsfleet International Station. It is oriented north towards the site. The high-speed train line and associated facilities are located to the rear-left of the viewpoint. A small section of the train-line and electricity pylons are visible in the left of the viewpoint.
- 9.84 The car park infrastructure occupies the fore- and middle ground of the view. There is ample greenery including mature trees and vegetation surrounding the carpark and in the background of the view. The greenery largely screens any build form present in the background of the view.
- 9.85 While the view has ample greenery, road and car parking infrastructure dominates the view, creating a transitory character.
- 9.86 The value attached to the view is **Low**.
- 9.87 The view would primarily be experienced by road users and rail station users / commuters.



PROPOSED

- 9.88 The Proposed Development is shown in the view as white chalk render, indicating the maximum parameter plans.
- 9.89 The Proposed Development will be entirely screened by trees and shrubbery in the middle ground of the view. Those using the area are primarily commuters / station users and road users who understand that the area that is undergoing substantial change. These visual receptors have a **Low** susceptibility to change and **Low** sensitivity. The magnitude of impact would be **Nil**.
- 9.90 The Proposed Development would give rise to a **None** Effect Likely effect. The effect is not significant.
- 9.91 The overall Scale of Effect would be None.



CUMULATIVE (TIER 1)

- 9.92 The cumulative tier 1 scenario would not change the effect of the Proposed Development. In the cumulative context the magnitude of effect would remain **None**. The effect is not significant, permanent and long-term.



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VIEW 10: THAMES WAY ROUNDABOUT**EXISTING**

- 9.93 View 10 is located at the Thames Way roundabout to the west of the railway line to Northfleet approximately 260 m to the south of the site. It is oriented north towards the site. The high-speed train line and associated facilities lie behind the viewpoint. A corner of the enclosure and a pylon are just visible to the left.
- 9.94 The roundabout infrastructure occupies the fore- and middle ground of the view. Trees and vegetation screen much of the background, including the railway bridge across Thames Way.
- 9.95 The view has ample greenery, but traffic infrastructure dominates, creating a transitory character.
- 9.96 The value attached to the view is **Low**.
- 9.97 The view would primarily be experienced by road users.



PROPOSED

- 9.98 The Proposed Development is shown in the view as white chalk render, indicating the maximum parameter plans.
- 9.99 The Proposed Development would be almost entirely screened by trees and shrubbery, only the tallest elements would be slightly visible in the backdrop of the view.
- 9.100 Those using the area are primarily road users who understand the area is undergoing substantial change. These visual receptors have a **Low** susceptibility to change and **Low** sensitivity. The magnitude of impact would be **Low**.
- 9.101 The Proposed Development would give rise to a **Minor** Likely Effect. The effect is not significant.
- 9.102 The overall scale of Effect would be **Minor**. The effect would be **Neutral**.



CUMULATIVE (TIER 1)

- 9.103 The cumulative tier 1 scenario would not change the effect of the Proposed Development. In the cumulative context the magnitude of effect would remain **Minor Neutral** effect. The effect is not significant, permanent and long-term.



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VIEW 11: STATION ROAD

EXISTING

- 9.104 View 11 is located approximately 300 m to the east of the site outside Northfleet railway station. It is oriented to the northwest along Station Road towards the site.
- 9.105 A row of two storey houses stands set back from the road and station forecourt on a raised level above a retaining wall. Station Road raises gently towards the viewer. The gable wall of the corner building is the key feature in the view. The houses are constructed in brick with rendered or pebbledash elevations. Large chimney stacks introduce a string vertical rhythm.
- 9.106 Apart from a shed or vehicle hangar, there are no buildings on the west side of Station Road. Only the lower part and enclosure of this building are visible. Cars are parked on the street in front of the houses.
- 9.107 The view is terminated by the roofs of the residential blocks at Robinson Way, partially screened by greenery and the fencing along the railway.
- 9.108 The value attached to the view is **Low**.
- 9.109 The view would primarily be experienced by local residents and commuters using the railway station.



PROPOSED

- 9.110 The Proposed Development is shown in the view as white chalk render, indicating the maximum parameter plans.
- 9.111 The Proposed Development will be entirely screened by interposing development in the foreground of the view due to the changes in topography between the viewpoint and the Proposed Development.
- 9.112 Those using the area are primarily local residents and commuters using the station who understand that the area that is undergoing substantial change. These visual receptors have a **Low** susceptibility to change and **Low** sensitivity. The magnitude of impact would be **Nil**.
- 9.113 The Proposed Development would give rise to a **None** Effect Likely effect. The effect is not significant.
- 9.114 The overall Scale of Effect would be **None**.



CUMULATIVE (TIER 1)

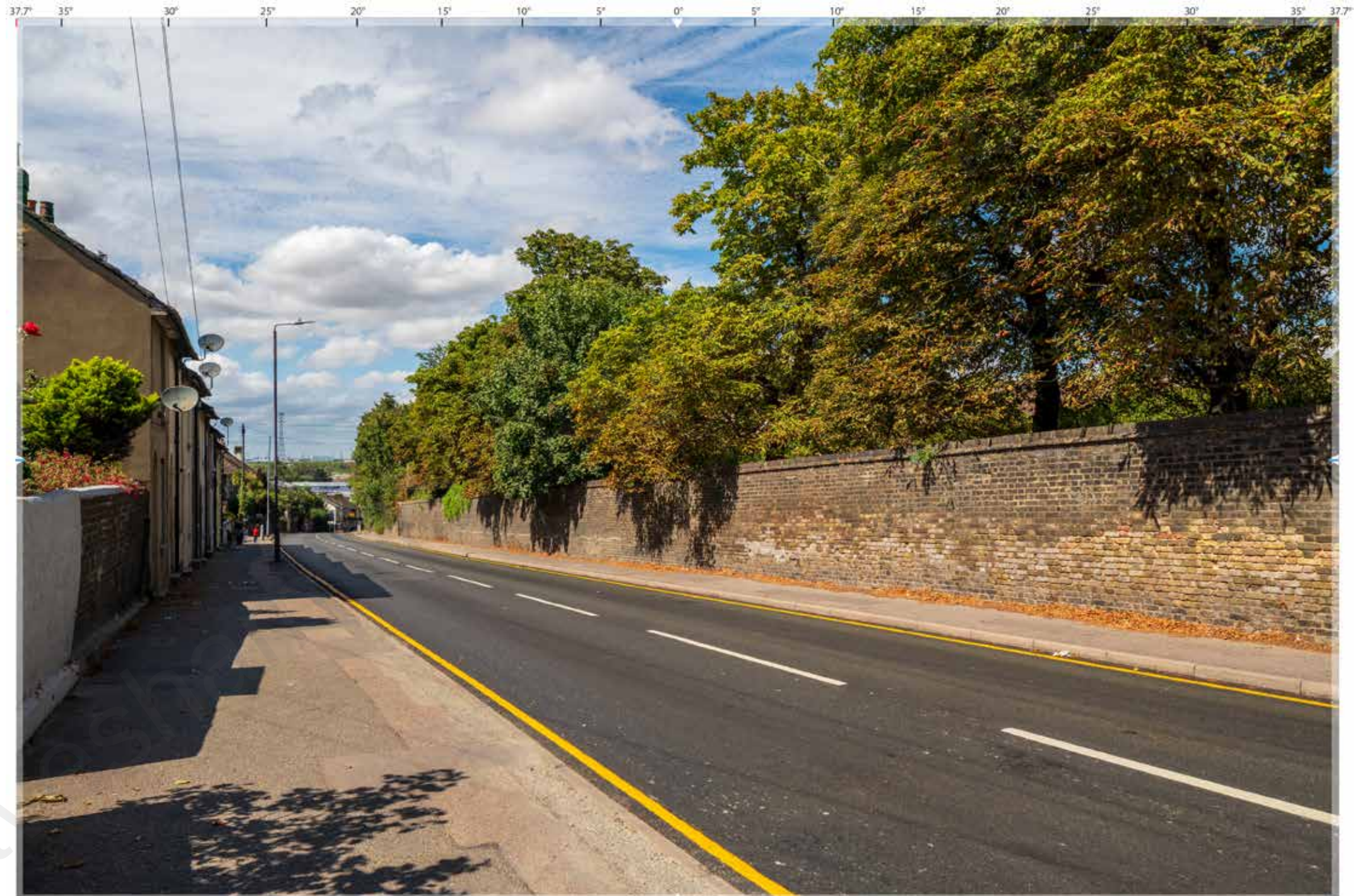
- 9.115 The cumulative tier 1 scenario would not change the effect of the Proposed Development. In the cumulative context the magnitude of effect would remain **None**. The effect is not significant, permanent and long-term.



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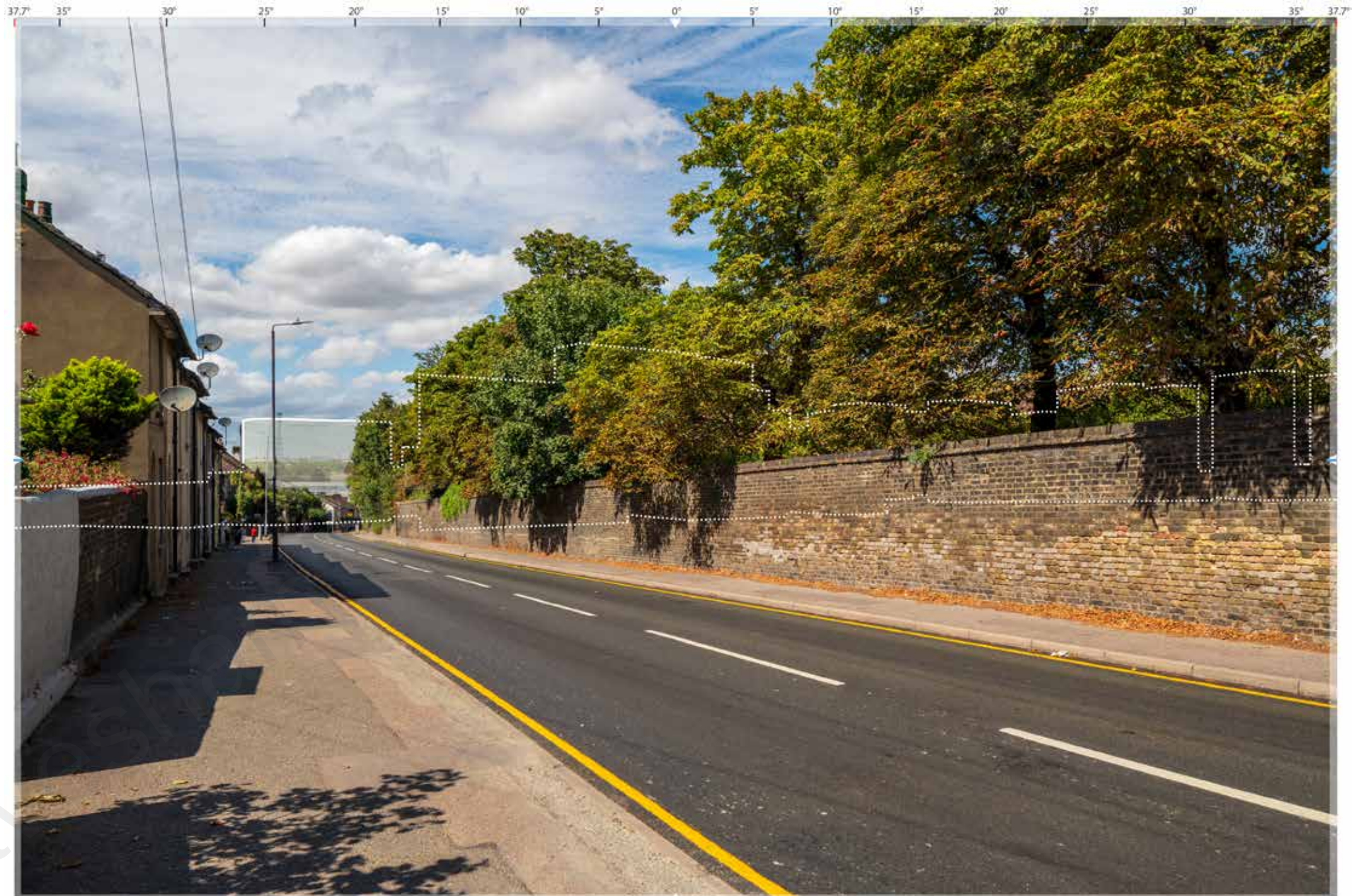
VIEW 12: STONEBRIDGE ROAD (LOOKING NORTH)**EXISTING**

- 9.116 View 12 is located on Stonebridge Road, approximately 240 m to the southeast of the site. It is oriented northwards along Stonebridge Road towards the site.
- 9.117 At this point, Stonebridge Road is lined by tall brick walls and a row of two storey houses. The road descends in a gentle curve down towards the large industrial sheds at the roundabout with Grove Road. Trees and hedges grow over the walls.
- 9.118 Given the elevated position, the view allows long views across the Swanscombe Peninsula and the Thames Estuary towards Essex. The high voltage pylon at the Stoneness Road Electricity Substation in Grays is a striking feature in the background. It appears next to the white substation building and the lantern posts on Stonebridge Road.
- 9.119 Despite the presence of greenery which gives the view a picturesque quality, receptors will be aware of the industrial activities at Northfleet.
- 9.120 The value attached to the view is **Low**.
- 9.121 The view would primarily be experienced by road users and local residents.



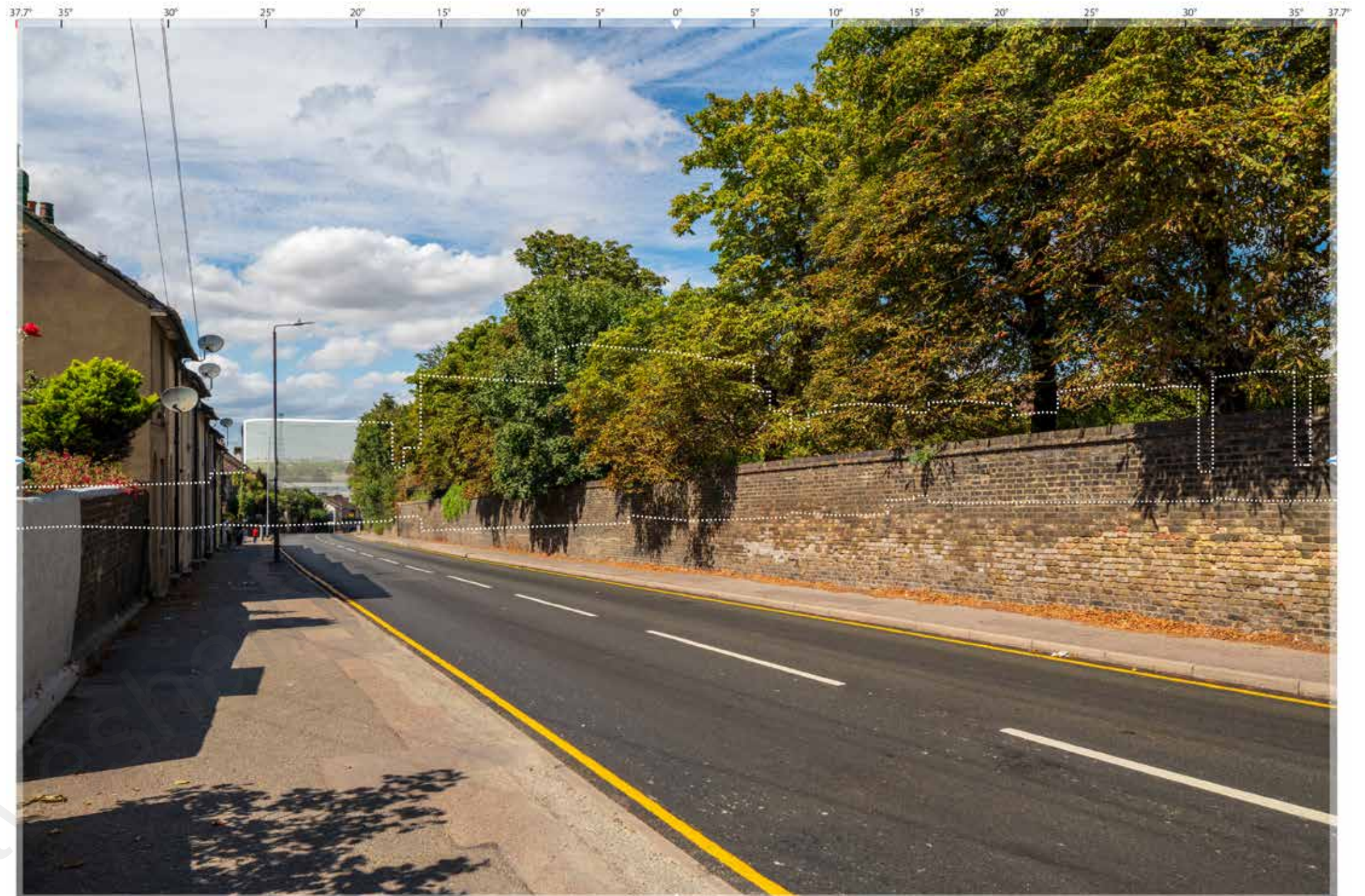
PROPOSED

- 9.122 The Proposed Development is shown in the view as white chalk render, indicating the maximum parameter plans.
- 9.123 The Proposed Development would be almost entirely screened by trees and shrubbery to the left of the view and by interposing development to the right. One of the taller blocks would be slightly visible in the backdrop of the view at the end of Stonebridge Road.
- 9.124 Those using the area are primarily road users and local residents who understand the area is undergoing substantial change. These visual receptors have a **Low** susceptibility to change and **Low** sensitivity. The magnitude of impact would be **Low**.
- 9.125 The Proposed Development would give rise to a **Minor** Likely Effect. The effect is not significant.
- 9.126 The overall scale of Effect would be **Minor**. The effect would be **Neutral**.



CUMULATIVE (TIER 1)

- 9.127 The cumulative tier 1 scenario would not change the effect of the Proposed Development. In the cumulative context the magnitude of effect would remain **Minor Neutral** effect. The effect is not significant, permanent and long-term.



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VIEW 13: RAILWAY STREET / HAMERTON ROAD JUNCTION**EXISTING**

- 9.128 The view is located approximately 220 m to the east of the site at the intersection of Railway Street and Hamerton Road. It is oriented northwest towards the site.
- 9.129 The view is characterised by tarmacked road infrastructure and mid-twentieth century terraced housing winding into the background of the view. Parked cars line the street and there is some greenery located to the left of the view along Railway Street. The view is located towards the top of a slope, Railway Street runs down the slope to the left and Hamerton Road appears to remain level towards the right of the view.
- 9.130 In the background some 21st century apartment blocks are visible beyond the trees to the left of the view. Pylons are visible beyond the blocks, rising higher in the background. The site is completely occluded beyond the apartment blocks to the left of the view.
- 9.131 The value attached to the view is Low.
- 9.132 The view would primarily be experienced by residents, road users and pedestrians given the residential nature of the view.



PROPOSED

- 9.133 The Proposed Development is shown in the view as white chalk render, indicating the maximum parameter plans.
- 9.134 The Proposed Development would be visible in the background of the view. The visual receptors are local residents, road users and pedestrians. These visual receptors have a **Medium** susceptibility to change and **Medium** sensitivity due to the residential nature of the viewpoint. The magnitude of impact would be **Medium**.
- 9.135 The prevailing datum of the Proposed Development would sit largely behind the interposing development in the foreground and middle ground of the viewpoint. As a result, visibility would be largely restricted to axial views along the road.
- 9.136 The taller elements are visible to the left of the view in the backdrop of the centre creating a focal point. The scale and massing of the Proposed Development is varied which complements the existing built receptors in the viewpoint.
- 9.137 From this viewpoint, the viewer would appreciate the ranging typologies of the new buildings, expressed in varying footprints.
- 9.138 The Proposed Development would give rise to a **Minor to Moderate** Likely Effect. The effect is not significant.
- 9.139 The overall Scale of Effect would be **Minor to Moderate**. The effect would be **Beneficial**. The effect is permanent, long-term and of a regional scale.



CUMULATIVE (TIER 1)

9.140 The cumulative tier 1 scenario would not change the effect of the Proposed Development. In the cumulative context the magnitude of effect would remain **Minor to Moderate Beneficial** effect. The effect not significant. The effect is permanent and long-term.



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VIEW 14: THE CREEK / GROVE ROAD**EXISTING**

- 9.141 View 14 is located on Grove Road at the junction with College Road, approximately 260 m to the east of the site; the view is oriented to the west.
- 9.142 The view is characterised by industrial uses, evidenced by tarmac surfaces, metal fencing and a tall boundary wall. The building in the foreground-left envelopes Aspdin's kiln, a scheduled monument; the heritage asset is not visible and does not add to the amenity value of the view. Robins Creek lies to the east behind the fence, screened by vegetation. A large tree and several hedges grow behind the boundary wall.
- 9.143 Different industrial structures appear above the vegetation, including an old shipping container, cranes and the facilities of the aggregate works to the north.
- 9.144 The value attached to the view is **Very Low**.
- 9.145 The view would primarily be experienced by the workers of the industrial site.



PROPOSED

- 9.146 The Proposed Development is shown in the view as white chalk render, indicating the maximum parameter plans.
- 9.147 The Proposed Development would be readily perceptible in the view from this location. The visual receptors are workers of the industrial site. These visual receptors have a **Low** susceptibility to change and **Low** sensitivity due to the industrial use of the location.
- 9.148 The Proposed buildings are spaced so as to allow sky gaps between them. As a consequence of their form and spacing they provide an attractive skyline composition. The proposed buildings will transition from the Boulevard to Promenade character area, as stipulated in the Design Code, which will add to the richness of variety. The Proposed Development would add visual interest and enhance the existing visual amenity of the area.
- 9.149 As the observer moves closer towards the site, they would be able to perceive heritage references within the public art adjoining Northfleet Harbour and Robin's Creek. The application is submitted in outline only, but the Design Code outlines the principle of these details which may be delivered through future reserved matters. The Design Code states they "must" be delivered, thus providing security of their delivery and allowing them to be considered by the decision maker as part of the Proposed Development. The delivery of these details may also be secured by the Council through a condition upon the application.
- 9.150 The magnitude of impact would be **High**. The Proposed Development would give rise to a **Moderate Beneficial** effect. The effect is significant, permanent and long-term.

