Appendix 1

Verified Views (AVRs).

View 1 | **Existing**

View 1 | **Proposed (Render)**

View 1 | **Proposed (Wireline)**

View 2 | **Existing**

View 2 | Proposed (Render)

View 2 | Proposed (Wireline)

View 3 | Existing

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View 3 | Proposed (Render)

View 3 | Proposed (Wireline)

View 4 | **Existing**

View 4 | Proposed (Render)

View 4 | Proposed (Wireline)

View 5 | **Existing**

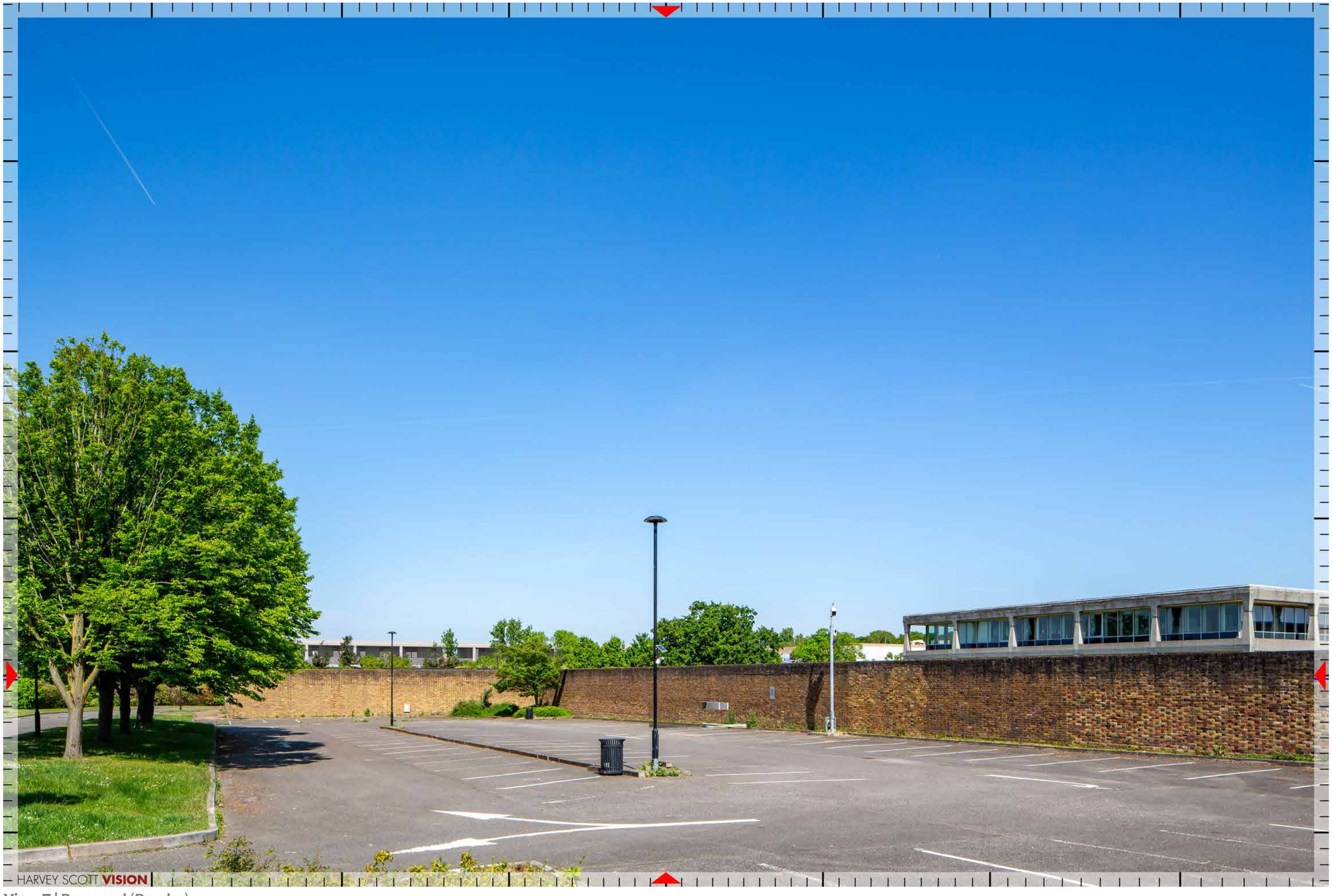
View 5 | Proposed (Render)

View 5 | Proposed (Wireline)

View 6 | **Existing**

View 6 | Proposed (Render)

View 7 | **Existing**

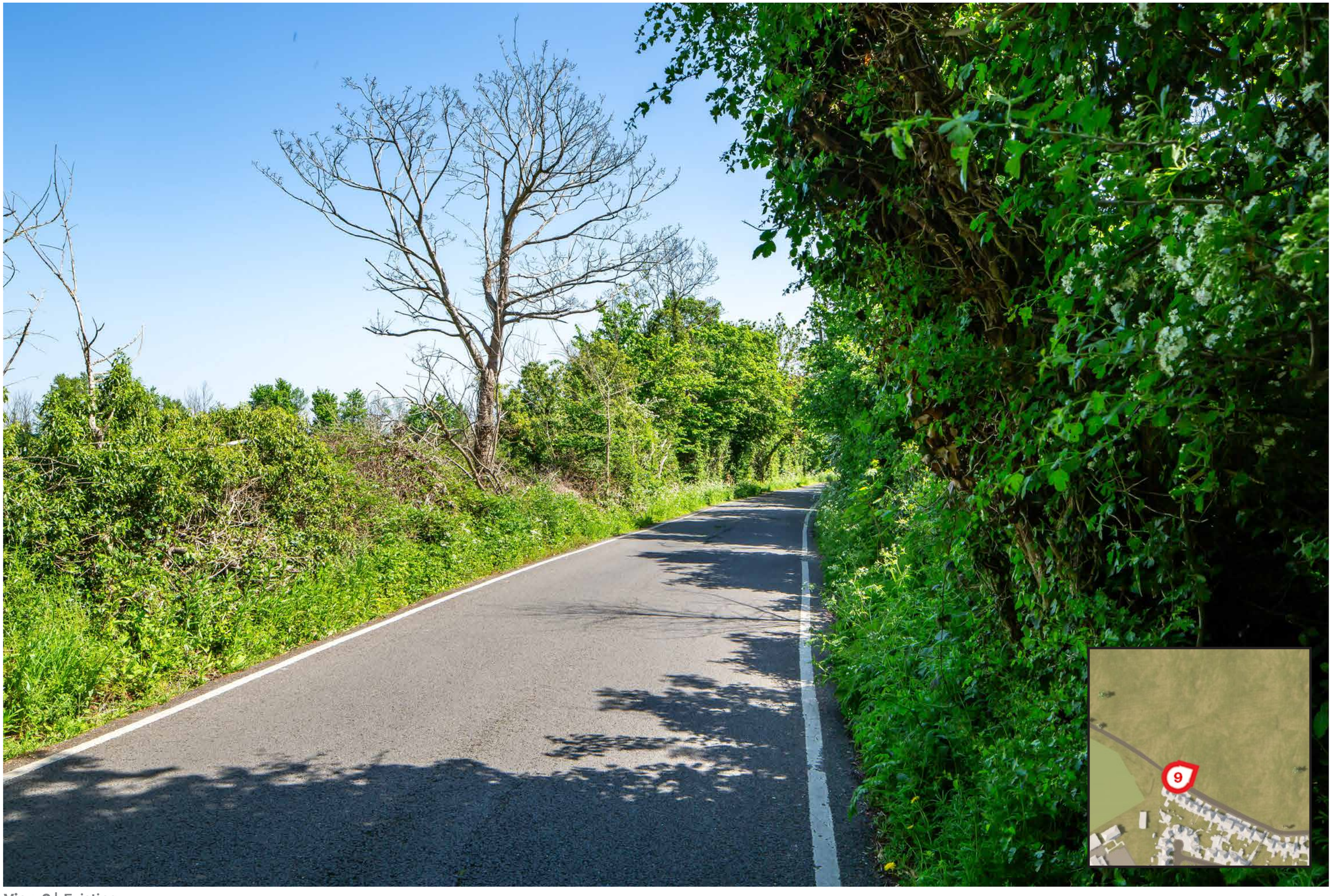


View 7 | Proposed (Render)

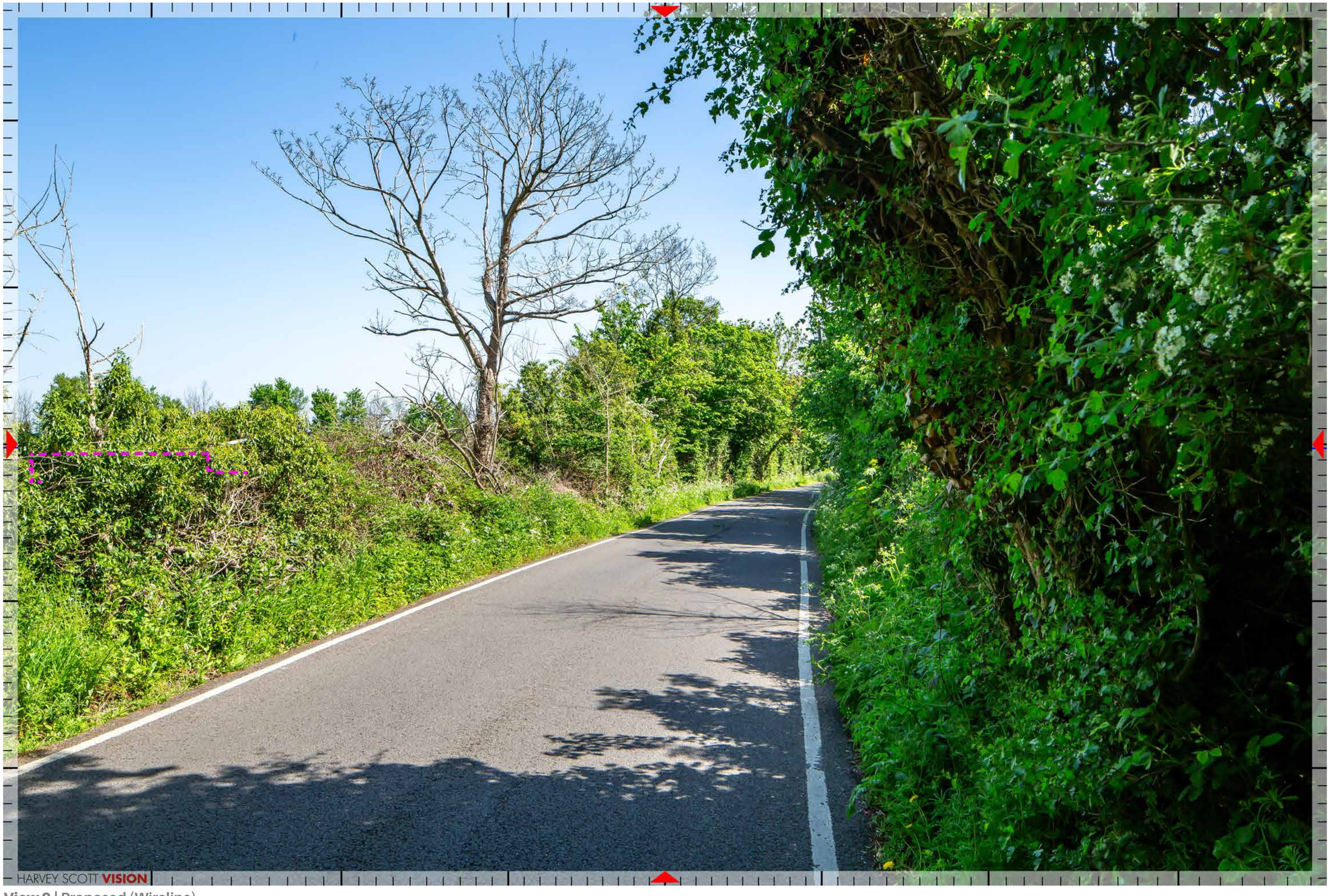
View 8 | **Existing**

View 8 | Proposed (Render)

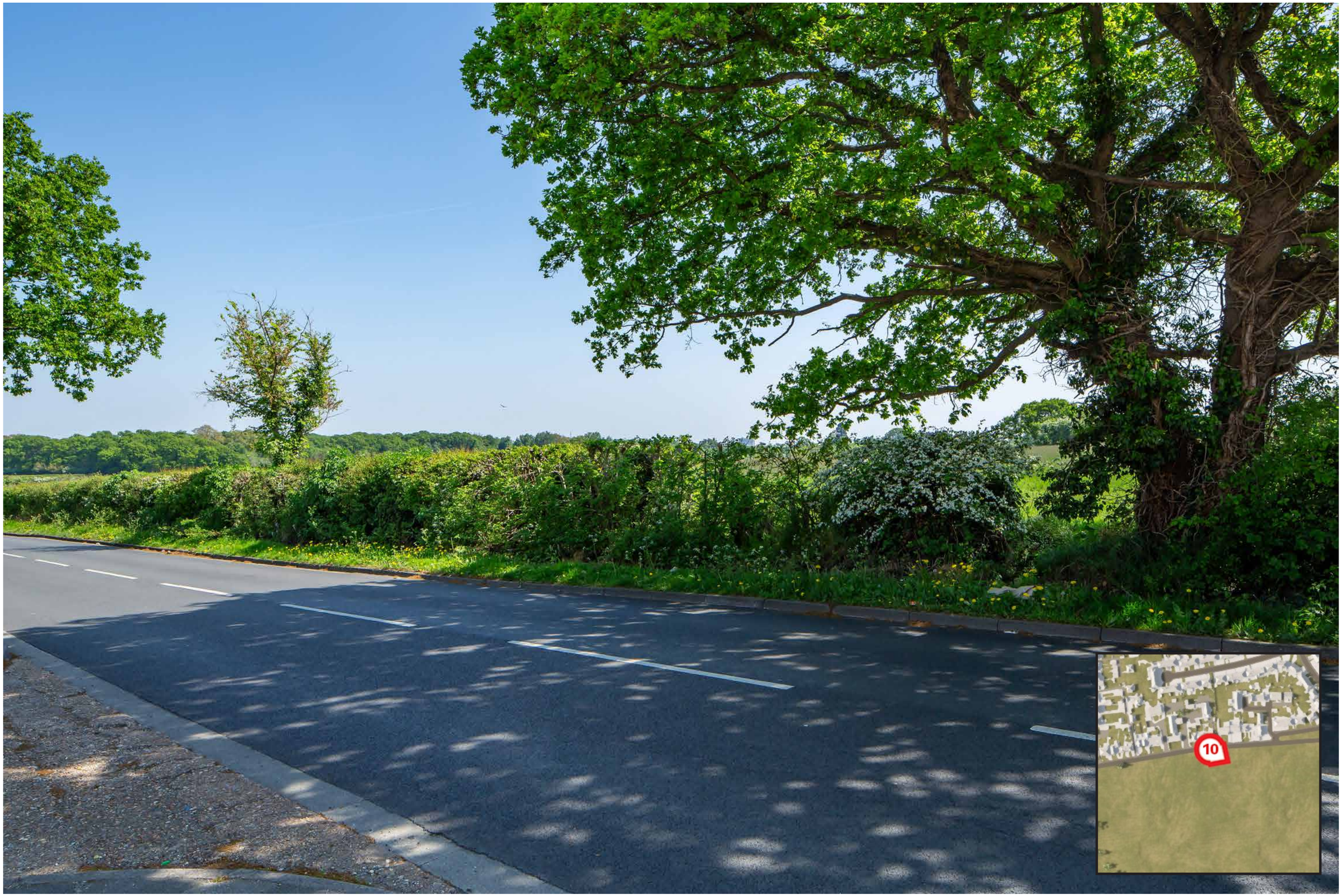
View 8 | Proposed (Wireline)



View 9 | Existing



View 9 | Proposed (Wireline)



View 10 | Existing

View 10 | **Proposed (Wireline)**

View 11 | Existing

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View 11 | Proposed (Wireline)

Appendix 2

Methodology.

Appendix 2 | Methodology

Heritage Assessment

This report provides an assessment of the significance of identified heritage assets and the potential effects of the proposed development. It has been informed by:

- Relevant legislation, and national and local planning policy (see Section 2); and
- Best practice guidance set out in:
  - Principles of Cultural Heritage Impact Assessment in the UK (IEMA/IHBC/CiFA, 2021)
  - Conservation Principles, Policies and Guidance (Historic England, 2008)
  - Good Practice Advice in Planning Notes (Historic England, various).

Under the requirements of the above policy and guidance, the process of heritage impact assessments can be summarised as involving three parts:

- Understanding the cultural significance of identified designated and non-designated heritage assets and their setting;
- Understanding the nature and extent of potential effects on significance and settings of identified heritage assets; and
- Making a judgement on the impact that the Proposed Development may have on significance and setting.

There are two ways in which the Proposed Development can affect heritage assets:

- by physical changes to the fabric, use and visual appearance of designated or non-non-designated heritage assets (known as direct effects); and
- by changes to the setting of designated or non-designated heritage assets in the vicinity (known as indirect effects).

Understanding Significance

Heritage assets are defined in Annex 2 of the NPPF as: '*A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority (including local listing)*'.

The setting of a heritage asset is defined as: '*the surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral*' (NPPF, Annex 2).

Non-Designated Heritage Assets ('NDHAs') are defined as buildings, structures and places which have a degree of heritage significance but do not meet the criteria for designation: '*Only a minority* [of buildings] *have enough heritage significance to merit identification as non-designated heritage assets*' (PPG paragraph 039).

NPPF paragraph 207 requires the significance of any heritage asset that may be affected by the Proposed Development to be described in a proportionate manner. The methodology used here for understanding the significance draws from the approach set out in Historic England's Conservation Principles and NPPF Annex 2 by defining heritage interests. As defined in the PPG (Historic Environment, para 06), the heritage interest may be:

- Archaeological;
- Architectural and artistic; and/or
- Historic.

It is important to note that understanding significance is primarily a descriptive exercise. However, guidance by IEMA, IHBC and CIfA identifies that 'importance' can be defined and scaled as 'high', 'medium' or 'low' or any other simple scale that offers a form of gradation. This is done in broad terms, as per Table H1. The ability to scale assets, including differentiating those of 'highest significance' is also established in the NPPF (i.e. para.213).

As identified in NPPF paragraphs 207 and 208, significance can also derive from the setting of a heritage asset. HE's GPA3 guidance gives general advice on understanding setting and how it may contribute to significance. This assessment follows the staged approach set out in GPA3 guidance to identifying the level of contribution that setting makes to the significance of heritage assets.

Assessing Effects

Legislative and policy requirements for the assessment of effects on heritage assets require the assessor to establish whether the value is preserved, better revealed/enhanced or harmed as a result of the Proposed Development.

Beneficial effects occur when the Proposed Development would enhance the value or contribution of the setting to value of heritage assets.

Should harm arise to the significance or contribution of setting to significance of designated heritage assets, there is a requirement in NPPF paras.212-215 to determine whether the level of harm amounts to 'substantial harm' or 'less than substantial harm'. Any harmful impact to the significance of a designated heritage asset should require and clear and convincing justification and be weighed against the public benefits of the Proposed Development. Great weight should be given to asset's conservation, the greater the harm, the greater the benefits that will be needed to justify approval.

For any harm to NDHAs, NPPF paragraph 216 requires balanced judgement with regard to scale of harm or loss and significance.

As established in Bramshill (2021) and Whitechapel Bell Foundry (2021) , when assessing effects, it is possible to undertake an internal heritage balancing exercise where relevant heritage harms and heritage benefits can be balanced to come to a 'net' position.

Significance	Designation of Receptor
Very High	Site acknowledged of international importance World Heritage Site
High	Grade I or Grade II* Listed Asset Scheduled Monument
Medium	Grade II Listed Asset Conservation Area
Low	NDHAs of higher local importance (including local listing) Designated Heritage Assets compromised by poor preservation
Very Low	NDHAs of lower local importance or compromised by poor preservation.

Table H1: Heritage Significance

Appendix 2 | Methodology

Townscape & Visual Assessment

The purpose of the townscape and visual appraisals is to determine the likely townscape and visual effects of the proposal by considering a combination of the townscape or viewer's sensitivity, and the magnitude of change that will be experienced.

The methodology used by Iceni Projects to assess the likely townscape and visual effects of the proposal is based on best practice guidance set out by the Landscape Institute in:

- Guidelines for Landscape and Visual Impact Assessment (GLVIA, Third Edition, 2013);
- Townscape Character Assessment Technical Information Note (TIN 05/17, 2018); and
- Visual Representation of Development Proposals, Technical Guidance Note (TGN 06/19, 2019).

GLVIA states in para.1.1 that when identifying landscape/ townscape and visual effects there is a '*need for an approach that is in proportion to the scale of the project that is being assessed and the nature of the likely effects. Judgement needs to be exercised at all stages in terms of the scale of investigation that is appropriate and proportional.*'

GLVIA recognises within para. 2.23 that professional judgement is at the core of LVIA/TVIA, and that while some change can be quantified, '*much of the assessment must rely on qualitative judgements*'. The Landscape Institutes Technical Committee has advised that the 2013 revision of GLVIA '*places greater emphasis on professional judgement and less emphasis on a formulaic approach*'.

Townscape Character

Townscape is defined in GLVIA at para.2.7 as '*the landscape within the built-up area, including the buildings, the relationship between them, the different types of urban open spaces, including green spaces, and the relationship between buildings and open spaces.*'

The assessment of townscape character provides an understanding of the distinctive qualities and characteristics that make up an area of townscape, including an understanding of how a place has evolved over time. Character analysis is supported by materials such as maps, illustrations and photographs.

Townscape Sensitivity

Establishing townscape sensitivity involves combining judgments about: (i) the value of the townscape character; and (ii) the susceptibility of the townscape to the change caused by the proposal.

The value of a townscape character area is defined in TIN 05/17 as its '*relative importance*' to '*different stakeholders*'. Value can be influenced by a range of factors including its intactness/condition, scenic quality, rarity, representativeness, conservation interests (i.e. heritage or environmental designations), recreational value, perceptual qualities or communal associations.

The susceptibility of townscape character areas to change is the ability of the townscape receptor to accommodate change without undue consequences for the maintenance of the aspects of the baseline condition that are of townscape value.

Value and susceptibility to change will be described in line with Tables T1 and T2. Overall sensitivity will be calculated by combining the two resulting judgements.

Visual Sensitivity

Assessments of visual effects focuses on the likely effects to visual receptors, i.e. people experiencing townscape views, and considers changes in visual amenity as a result of the proposal.

Establishing visual sensitivity involves combining judgments about: (i) the value of the view; and (ii) the susceptibility of the visual receptor to the change caused by the proposal.

The value attached to views relates to planning designations or their identification in tourist guidebooks, literature, art etc.

For visual receptors (i.e. people), susceptibility to change depends on their circumstances (location, time of day, season, length of exposure to view) and reason for being at this viewpoint (i.e. passing through while commuting or using the area for recreation).

Value and susceptibility to change will be described in line with Tables V1 and V2. Overall sensitivity will be calculated by combining the two resulting judgements.

Townscape Value	Typical Criteria
High	Often featuring or contributing positively to national heritage designations (i.e. conservation areas, listed buildings), protected view corridors/skylines, designated green spaces or award-winning design. Generally of high quality urban design or amenity value and in good condition, with very few detracting features (if any). A rare example of, or representative of, a particular characteristic townscape element or feature.
Medium	Often featuring or contributing positively to local heritage designations (i.e. locally listed buildings, areas of townscape value), locally identified view corridors, or locally designated green spaces. In relatively good condition, with areas of high quality urban design or amenity value, or containing some particularly characteristic features. Generally few detracting features overall.
Low	Generally without designations, of low quality and in poor condition with scope for enhancement in terms of appearance and amenity. May contain some positive features, but these do not characterise the whole.
Very Low	Of very low quality and in very poor condition with notable scope for enhancement in terms of appearance and amenity.

Table T1: Townscape Value

Townscape Susceptibility to Change	Typical Criteria
High	Townscapes with a little ability capacity to accommodate the type of change proposed, owing to the interaction of the proposed development with the prevailing character, built form, topography etc, and the limited presence of screening effects (if applicable)..
Medium	Townscapes with a good capacity to accommodate the type of change proposed as it might be reflective of the scale and character of parts of the surrounding townscape. There are opportunities for enhancement that proposals may address and/or some existing screening effects (vegetation, density of development, orientation of streets etc.).
Low	Townscapes with a very good capacity to accommodate the type of change proposed, as the proposed development may comprise only a small part of the wider townscape, or being in-keeping with the overarching character of the surroundings. There may be distinct opportunities for enhancement and/or a high level of existing screening effects (vegetation, density of development, orientation of streets etc.).

Table T2: Townscape Susceptibility to Change

Visual Value	Typical Criteria
High	Designated or protected viewpoint, vista or panorama. Views related to highly graded heritage designations (i.e. World Heritage Sites, Grade I or II* listed buildings or registered parks and gardens, or of high importance to a conservation area), identified tourist spots or with well-known cultural associations.
Medium	Locally identified viewpoint, vista or panorama. Views related to heritage designations (i.e. conservation areas, Grade II listed buildings, locally listed buildings) or from within designated green/amenity spaces.
Low	General townscape view without designation, although may have some amenity value for local residents.
Very Low	General townscape view without designation, and likely of no amenity value for local residents.

Table V1: Visual Value

Appendix 2 | Methodology

Magnitude of Change

The magnitude of change is considered to be a combination of (i) the size and scale of the potential change; (ii) the geographical extent of the area affected; and (iii) the duration of the change of the proposal in operation and its reversibility. Magnitude of change will be described in line with Table M1.

Overall Effect

Table E1 provides a matrix for determining the overall effect based on the sensitivity of the receptor and the magnitude of impact. Consideration is given to the extent mitigation and/or enhancement has been achieved through design and whether the qualitative nature of the resultant effect is, therefore, 'beneficial', 'adverse' or 'neutral'.

Many urban developments provide an opportunity to enhance the condition, appearance and functionality of an existing townscape. Urban developments of quality, therefore, often have mitigation built into them by design and are designed to be visible. This can differ somewhat from the approach to Landscape and Visual Impact Assessments (as outlined in GLVIA3) where, generally, the visibility of a scheme can be inherently harmful when it is built development in a rural landscape.

Beneficial effects occur when the Proposed Development would give rise to:

- enhancement of the overall townscape quality or reinforcement of the key characteristics of townscape character; and/or
- enhancement of visual amenity of receptors.

Adverse effects occur when the Proposed Development would give rise to:

- harm to the overall townscape quality or the key characteristics of townscape character; and/or
- harm to the visual amenity of receptors.

As per GLVIA para. 5.37, it is possible for effects to be neutral and this a matter of professional judgement. These include:

- the degree to which the proposal fits with, or preserves, an existing character;
- where a fine balance occurs between beneficial and adverse effects, 'neutral' is considered the centre point of the nine-point scale. This assessment is on occasion adopted where a discernible impact is identified but other benefits are also delivered through the Proposed Development, for example, high-quality design in its own right even if contrasting to existing character.

The meaning of 'neutral' is distinct from the meaning of 'negligible' and these terms should not be conflated by the reader.

Cumulative Effect

The assessment takes the following approach as set out in GLVIA: "the additional changes caused by a proposed development in conjunction with other similar developments" (paragraph 7.3). This "additional" approach focuses on the additional effects of the project being assessed, on top of the cumulative baseline (as per paragraph 7.18) and has been selected to ensure that the scope of the assessment is reasonable and proportionate to the nature of the project (as per paragraph 7.5 and paragraph 7.18).

Visualisation

The visualisations within this report have been prepared in general conformance with the Landscape Institute's TGN 06/19. This advocates a proportionate and reasonable approach, which includes professional judgement, in order to aid informed decision making.

In this case, Type 4 visualisations (verified views or AVRs) were prepared by Harvey Scott Vision. Their methodology is included at Appendix 3.

The AVRs are produced as a mixture of shaded wirelines (AVR level 1) and renders (AVR level 3).

Visual Susceptibility to Change	Typical Criteria
High	Users of public rights of way, open spaces or outdoor recreational facilities where the purpose of the recreation is the enjoyment of visual amenity, such as visitors to heritage assets (such as National Trust properties, Conservation Areas), tourist spots or parks with generally open or unspoilt views.
Medium	Users of public rights of way, open spaces or outdoor recreational facilities where visual amenity is secondary to activity (e.g. sports pitches, golf courses, shopping). Open views but from less sensitive areas. Residents of an area more likely to notice change in their surroundings when travelling to or from home.
Low	Users of public rights of way, open spaces or outdoor recreational facilities where the view is restricted or incidental to the activity. People in transit (pedestrians, cyclists, motorists, public transport) or undertaking activities (i.e. commuting, working) where any views are incidental to the activity or capacity to take in views is restricted.

Table V2: Visual Susceptibility to Change

Magnitude of Impact	Typical Criteria
High	Total loss, major alteration or fundamental change to key characteristics or features of the baseline.
Medium	Partial loss, material alteration or visible but contextual change to key characteristics or features of the baseline.
Low	Minor loss, alteration or discernible but non-material change to key characteristics or features of the baseline.
Very Low	Barely distinguishable or very limited change from baseline conditions.
No Change	No change from baseline conditions

Table M1: Magnitude of Impact

Overall Effect	Magnitude of Impact				
Sensitivity	**High**	**Medium**	**Low**	**Very Low**	**No Change**
High	Major	Moderate	Moderate / Minor	Minor	No Effect
Medium	Moderate	Moderate	Minor	Minor / Negligible	No Effect
Low	Moderate / Minor	Minor	Minor / Negligible	Negligible	No Effect
Very Low	Minor	Minor / Negligible	Negligible	Negligible	No Effect

Table E1: Overall Effect

Appendix 3

Visualisation Methodology Statement.

Delivery | Design | Engagement | Heritage | Impact Management | Planning
Sustainable Development | Townscape | Transport

Edinburgh : 11 Alva Street | Edinburgh | EH2 4PH
Glasgow : 177 West George Street | Glasgow | G2 2LB
London : Da Vinci House | 44 Saffron Hill | London | EC1N 8FH
Manchester : This is The Space | 68 Quay Street | Manchester | M3 3EJ
Birmingham : The Colmore Building | 20 Colmore Circus Queensway | Birmingham | B4 6AT

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