

**TOWNSCAPE AND VISUAL IMPACT ASSESSMENT – V2
DOWNINGS MALTHOUSE, BAKERS QUAY, GLOUCESTER
ON BEHALF OF ROKEBY DEVELOPMENTS.**

TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)

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1. INTRODUCTION

- 1.1 This Townscape and Visual Impact Assessment (TVIA) has been prepared on behalf of Rokeby Developments. in support of a planning application for a new residential development proposed at The Downings Malthouse, Bakers Quay, Gloucester. The local planning authority is Gloucester City Council (hereafter referred to as 'the Council').
- 1.2 The Landscape Institute's Technical Information Note 05/2017 (Revised April 2018) advises that '*...townscape, like the rural landscape, reflects the relationship between people and place and the part its plays in forming the setting to our everyday lives. It results from the way that the different components of our environment – both natural and cultural – interact and are understood and experienced by people.*'¹ The term 'landscape' is therefore synonymous with the term 'townscape' when considering an Application Site such as this in the urban context.
- 1.3 This TVIA has been undertaken by a Chartered Member of the Landscape Institute (CMLI) and should be read in conjunction with the supporting Planning Documents, the Design and Access Statement, plans and elevation drawings prepared by Roberts Limbrick Architects and other relevant documents submitted by the Applicant.
- 1.1 This TVIA considers the effects of the proposed scheme on the townscape elements, townscape character, and visual amenity associated with the Site and its local context. This assessment has been produced following discussions with the Council and input from the Gloucestershire Review Panel. It is noted that this does not form a heritage assessment in relation to listed buildings, their setting or the adjacent Conservation Area.
- 1.2 The TVIA scope of work follows good practise and the Guidance for Landscape and Visual Impact Assessment (GLVIA)². The detailed methodology based upon this guidance, is provided in Appendix 1.

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

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

2. PROPOSED DEVELOPMENT

- 2.1 The proposals for the northern parcel of land comprise incorporating the remaining exterior walls of the listed Downings Malthouse buildings which sit within the 0.5Ha Site, and construction of two key built forms with associated parking, a plaza and infrastructure. The buildings would be formed of two elements 'Downing Malthouse' and 'Downing Tower', and would produce 117 residential units, with a commercial floorspace, and a reinstated bridge link to the adjacent warehouse extension building to the west of Merchants' Road. The northern section of the site is to contain the Malthouse element formed of four storeys, with the Tower element being to the south of the site formed of ten storeys.
- 2.2 The proposed buildings and 18 of the external parking spaces broadly occupy the northern and western parcel of the Site with the south-eastern area taken up by additional external parking. The proposals allow for a strip public realm along the southern boundary of the site which will create a link along the edge of the Gloucester and Sharpness Canal for the public to access and enjoy.
- 2.3 Areas of landscaping have also been included. These are located within the diagonal entrance courtyard between the two buildings, these areas will have a softening effect to the entrance area. Incidental areas of landscape are included within the south-eastern area of car park, allowing the introduction of vertical form and a variety of species for visual/wildlife interest.
- 2.4 The location of the Application Site is shown on Figure 1 Site Location Plan and Figure 2 Topography Plan. The Design and Access Statement prepared by Roberts Limbrick Architects provides information on the design rationale and description in terms of the mass, scale, and form of the buildings together with the proposed materials and surface finishes subject to planning conditions. The drawings illustrating the mass, scale, form, and appearance of the Proposed Development are included as part of this planning application.

Site Clearance, Demolition and Tree Removals

- 2.5 The remaining walls of the former maltings warehouse will be preserved and repaired with several notable key external walls and features, such as the Malthouse Kiln north wall, being accommodated in the proposed development.
- 2.6 The western section of the site is currently being used as approximately half car park and half as a hard surfaced area of public realm with picnic benches for use by the general public.

2.7 There are no trees or vegetation on site.

Building Mass, Scale, Form and Appearance

- 2.8 The northern section of the site will contain two buildings and parking and an area of public realm, as detailed in Section 4.1-4.3 of the Design and Access Statement. Key features will be the four storey northern building, the 'Downing Malthouse'; and the ten storey 'Downing Tower'.
- 2.9 The materials for the built form are proposed to be white bricks with a grid-like arrangement of windows. The Tower building will feature a pillared entrance holding up the building above and defining the entrance onto Merchant's Road.
- 2.10 Changes to the western section of the site will be of minimal note with a small section of the public realm area being converted to ground level car parking. An area along the canal side will be retained as public realm with seating, and thus the perception of these changes is assumed to be minimal.

PLANNING POLICY AND GUIDANCE

2.11 The relevant landscape planning policies are detailed within:

- The revised National Planning Policy Framework (NPPF) (July 2021)
- Gloucester City Council ('The Council') Local Plan – which is the Joint core Strategy (2017) and Gloucester Local Plan, saved policies (1983)
- Second Stage Deposit City of Gloucester Local Plan (2002)
- Gloucester City Council Heights of Buildings Supplementary Planning Document (2008)

National Planning Policy Framework (NPPF)

2.12 The National Planning Policy Framework (NPPF) updated in July 2021 sets out the governments planning policies for England and how these are expected to be applied.

2.13 The NPPF promotes a presumption in favour of sustainable development, defined as, *'meeting the needs of the present without compromising the ability of future generations to meet their own needs'*, providing it is in accordance with the relevant up-to-date local plan and policies set out in the NPPF, including those identifying restrictions with regard to designated areas.

2.14 The NPPF identifies a number of aspects which should be considered in developing local plans and reviewing planning applications. Those with regard to townscape and visual issues are Section 12: Achieving well-designed places and Section 16: Conserving and enhancing the historic environment.

2.15 Section 12: Achieving well-designed places provides guidance on ensuring the delivery of good design. The NPPF requires planning policies and decision makers to promote development that is sympathetic to local character and be visually attractive, whilst not discouraging innovation, change, or more effective land use (Section 11 of the NPPF). Paragraph 130 states that planning policies and decisions should aim to ensure that developments:

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

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

c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not

preventing or discouraging appropriate innovation or change (such as increased densities);

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

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

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

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

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

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

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

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

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

Planning Practice Guidance (PPG)

- 2.17 The PPG on Design, which supports the NPPF, provides advice to Local Planning Authorities with regard to the weight attached to design and sustainability in decision making process (Paragraph: 001 Reference ID: 26-001-20191001, Revision date: 01 10 2019):

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

- 2.18 It also references the recently published National Design Guide with its 10 characteristics, which include: context, identity, built form, movement, nature, public spaces, uses, homes and buildings, resources, and lifespan.

Gloucester City Council Local Plan

- 2.19 The Council's Local Plan is a combination of the Joint Core Strategy (2017) and Gloucester Local Plan saved policies (1983).

- 2.20 The Joint Core Strategy will henceforth be known as the JCS.

Joint Core Strategy (2017)

- 2.21 The Joint Core Strategy is a combination of three Councils: Gloucester City, Cheltenham Borough and Tewkesbury Borough. The site sits within the boundaries of Gloucester City.

- 2.22 The key element of the Joint Core Strategy is the Vision by 2031, which notes:

'...New developments will have been built to the highest possible standards of design and focused on protecting the quality and distinctiveness of each community. Established in sustainable locations, without the risk of flooding, they will have been designed with sensitivity towards existing villages, towns, and cities and with respect for the natural and built environment.'

- 2.23 To support the Vision, Strategic Objectives have been established. Strategic Objective 4 – Conserving and enhancing the environment ensures that planning policy and decisions:

- *'Protect and enhance the JCS area's unique historic environment...;*
- *Conserve, manage and enhance the area's unique natural environment and biodiversity, including its waterways...*
- *Require that all new developments, wherever possible, supports green infrastructure within urban and rural areas to provide movement corridors for people and wildlife.'*

2.24 Strategic Objective 5 – Delivering excellent design in new development ensures that all new developments are valued by residents by:

- *Creating a strong sense of place through high quality and inclusive design that respects and enhances local distinctiveness.*

2.25 Part 4 of the JCS breaks down several Sustainable Development Policies. The relevant policies are noted below:

2.26 SD4 – Design Requirements

i. Context, Character and Sense of Place;

New development should respond positively to, and respect the character of, the site and its surroundings, enhancing local distinctiveness, and addressing the urban structure and grain of the locality in terms of street patterns, layout, mass, and form. It should be of a scale, type, density, and materials appropriate to the site and its setting. Design should establish a strong sense of place using streetscapes and buildings to create attractive and comfortable places to live, and having appropriate regards to the historic environment.

2.27 SD6 - Landscape

1. Development will seek to protect landscape character for its own intrinsic beauty and for its benefit to economic, environmental and social well-being;

2. Proposals will have regard to the local distinctiveness and historic character of the different landscapes in the JCS area, drawing, as appropriate, upon existing Landscape Character

Assessments and the Landscape Character and Sensitivity Analysis. They will be required to demonstrate how the development will protect or enhance landscape character and avoid detrimental effects on types, patterns and features which make a significant contribution to the character, history and setting of a settlement or area;

3. All applications will consider the landscape and visual sensitivity of the area in which they are to be located or which they may affect.

2.28 SD8 - Historic Environment

2. Development should make a positive contribution to local character and distinctiveness, having regards to valued and distinctive elements of the historic environment.

Gloucester Local Plan Saved Policies (1983)

2.29 In light of the adoption of the JCS, and a review of the NPPF, the Council decided only two policies from the Local Plan will be 'saved'. Policy A1.a 'Heights of buildings and protected views is the policy relevant to this report:

A.1(a) A 'Heights of Buildings Policy' will be applied as detailed in Appendix 5 particularly to protect views of the cathedral'

2.30 Appendix 5 of the Gloucester Local Plan details three zones of height restriction which apply to new development within the City:

(a) Inner Area – New buildings in the immediate vicinity of the Cathedral and along avenues of vision from:

(i) The Park Pavilion and Robinswood Hill

(ii) The Horton Road Stadium,

(iii) London Road and Hillfield House

(iv) Longford Lane

(b) An area surrounding zone (a) above, north to Estcourt Road, east to Horton Road and south to Barton Street, Parkend Road

and the Old Docks Loop Railway Line, is designated a zone of special control. New developments will be given individual consideration but, in any case, no new buildings will exceed 23 metres above ground level.

(c) An area south of (b) above, east of the canal, extending south to Cole Avenue where higher buildings would be acceptable, subject to design and local environmental considerations.

- 2.31 Area (a) is defined on the Proposals Map, however neither Area (b) or (c) are defined on a map. From the written descriptions above we recognise that the site lies within Area (c).

Second Stage Deposit City of Gloucester Local Plan (SSD) (2002)

- 2.32 The SSD is a draft plan that was published and approved by the council for development management decision making in 2002. As the SSD is not an adopted plan the policies contained within it could not be superseded by the adoption of the JCS in accordance with Regulation 8(5) of the Town and Country Planning (Local Planning) (England) Regulations 2012.

The relevant retained policy from the SSD is Policy BE.2 'Views and Skyline' which policy forms the policy context for the Gloucester City Council Heights of Buildings Supplementary Planning Document (2008).

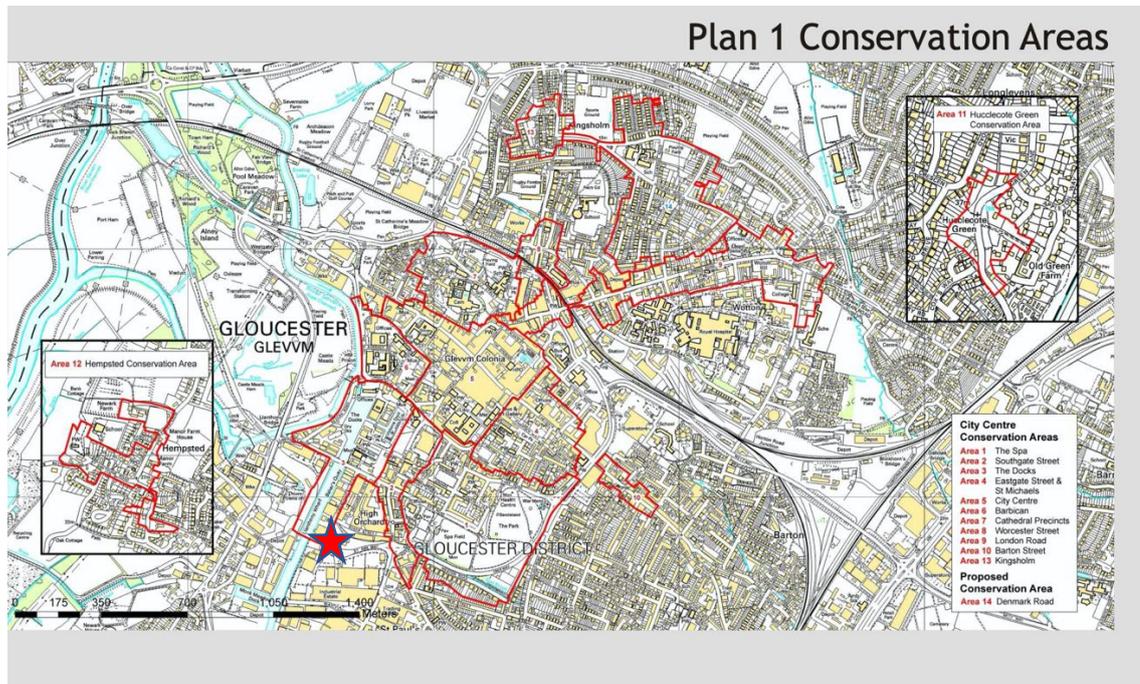
- 2.33 Policy BE.2 Views and Skyline

Proposed development should respect and protect the city skyline and important views and vistas within the city, views of the surrounding countryside from within the city, and views of the city from the surrounding countryside. It will be particularly important to protect views of the Cathedral

Gloucester City Council Heights of Buildings Supplementary Planning Document (2008)

- 2.34 This document is, in effect, an extension of the 1983 Local Plan policy on tall buildings and is a study aiming to provide design reference when developing proposals for a tall building within Gloucester.

- 2.35 Within the document it defines a 'tall building' as any structure that breaks the skyline and/or which is significantly or noticeably taller than its surrounding built fabric.
- 2.36 Plan 1 within the SPD outlines the different conservation areas within the City, the site lies just outside the Docks Conservation Area.



Insert A: Red star indicates Site within Plan 1 Conservation Areas ³

- 2.37 Plan 2 within the SPD identifies Local View Corridors and Plan 3 identifies Strategic View Corridors. These view corridors are considered strategically important in retaining the unique character and distinctiveness of Gloucester.

³ Gloucestershire Website <https://www.gloucester.gov.uk/media/1202/heightsofbuildingnov2008.pdf> (accessed 7th April 2022)



Insert B: Red star indicates Site within Plan 2 Local View Corridors ⁴



Insert C: Red star indicates Site within Plan 3 Strategic View Corridors ⁵

2.38 View corridors which are relevant to this site lie on Plan 3; Strategic View Corridor 7: Netheridge, and Strategic View Corridor 8: Canal side.

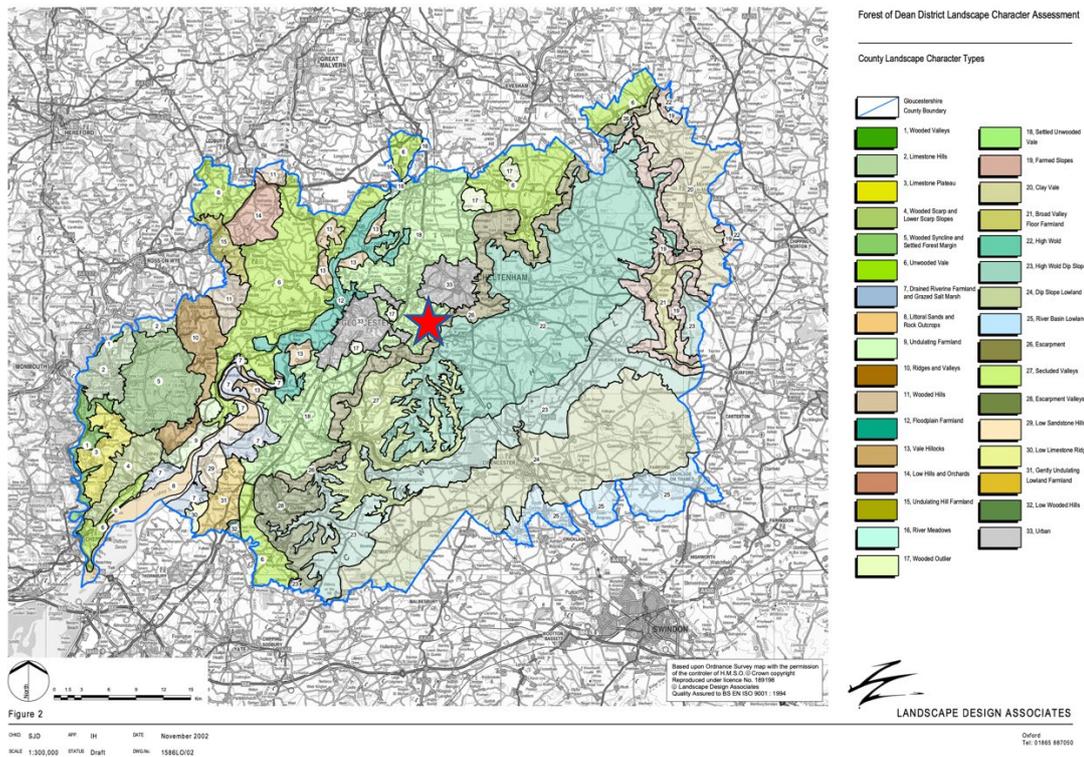
⁴ Gloucestershire Website <https://www.gloucester.gov.uk/media/1202/heightsofbuildingnov2008.pdf> (accessed 7th April 2022)

⁵ Gloucestershire Website <https://www.gloucester.gov.uk/media/1202/heightsofbuildingnov2008.pdf> (accessed 7th April 2022)

2.39 Section 3.0 of the SPD goes on to set out the design and assessment criteria which should be considered for an application for a tall building. It notes that *'Tall buildings should be sited in areas of the City which have minimum visual impact on sensitive historic environments'*. It is also notes that *'A very high standard of design will be required of any proposed tall building. Due to the greater visual and physical impacts of tall buildings on surround areas...'*.

3. BASELINE CONDITIONS

3.1 The Site falls within NCA of 'Severn and Avon Vales' (Area 106) and categorised as an 'Urban' Landscape Typology (refer to Insert D below) in the Forest of Dean District Landscape Character Assessment⁶.



Insert D: Red star indicates Site within Forest of Dean District Landscape Character Assessment⁷

3.2 The Gloucester urban area, including the site, is covered by Gloucester City Council's Townscape Character Assessment : Gloucester (2019). The assessment covers the entire area within the boundary of Gloucester City, and uses as a baseline the 15 Wards of Gloucester City as defined on the map on page 5 of the document. The site lies within Ward area Westgate.

Application Site

3.3 The Site lies within the south-western area of Gloucester City and is located approximately 1km south-west of the city centre, sitting within the Historic Docks area. The historic Gloucester Cathedral is located quite centrally within the centre of Gloucester city, and lies approximately 1km to the north-east of the site, also north

⁶ Gloucestershire Website <https://www.fdean.gov.uk/media/yvqf5iaz/forest-of-dean-district-landscape-character-assessment-report.pdf> (accessed 7th Apr 2022)

⁷ Gloucestershire Website https://www.gloucestershire.gov.uk/media/6797/glca_county_types_figure_2002-51672.pdf (accessed 7th April 2022)

east, approximately 1.2km from the site is Gloucester Railway Station, with the track route running in a broadly east/west direction.

- 3.4 The Gloucester and Sharpness Canal, to the west of the Site, and abuts a portion of the Site boundary. The River Severn runs approximately 1.5km west of the site. Both the Canal and River run in a broadly north/south direction (refer to Figure 1 for further details).
- 3.5 West of the site, beyond the Gloucester and Sharpness Canal, lies the Llanthony Secunda Priory, which is the remains of a Priory and its grounds, founded in 1136. The priory building itself is approximately 170m west of the most westerly point of the site.
- 3.6 The Site currently contains the preserved walls of the previously derelict listed buildings in the northern section; and to the west, car parking and an area of hard surfaced public realm.

Site Context

- 3.7 The site is divided into two components, the proposed built form and a number of parking spaces in the north-east, and an area of proposed ground level parking in the south-west. The areas are divided by the Merchants Road, which runs south and then heads south-east (refer to Figure 1 – Site Location Plan).
- 3.8 The proposed built form in the north-east area of the site will be developed as two separate buildings divided by linear areas of public realm providing access to the buildings and areas of soft landscaping. A basement level will be formed below both the buildings to accommodate underground parking; this will be accessed from the north via ramp down from an area of external parking. On-road parking is proposed north-east of the northern building on High Orchard Road (refer to Proposed Block Plan by Robert's Limbrick Architects).
- 3.9 The northern building, the Downing Malthouse, will be a four-storey building, which will be residential except for a small commercial unit on the lower floor in the north-west corner of the building, adjacent Merchants Road. The retained walls on site are formed of brown/red bricks, with the proposed built form being constructed of predominantly salmon / light red bricks, with the southern façade in white bricks, in order to reflect but not to match the historic elements.
- 3.10 The southern building, the Downing Tower, will be a ten-storey building which will be entirely residential. As per the northern building, existing retained wall elements

are formed of traditional brown/red bricks with the new elements being formed of salmon / light red bricks with the northern façade formed of white bricks.

- 3.11 The south-west area of the site will consist of parking and associated infrastructure, including areas of soft landscape. The boundary with the Gloucester and Sharpness Canal will be designed as an area of public open space, with street furniture. This is intended to link to adjacent publicly accessible canal frontages.
- 3.12 The existing site is broadly level, with the south-west portion being lower by only 1-2m. Proposed level changes within the Site are formed artificially around the buildings providing access.
- 3.13 Outside the Site there is mostly built form, to the east is the Gloucester Quays Shopping centre, with the multi-storey car park and circular entrance ramp being the closest part to the Site, adjoining High Orchard Road which runs along a portion of the eastern site boundary. The shopping centre also continues in the building north of the site, a small row of cottages 'Malsters Cottages' lie to the north-east of the site, dividing the site from the shopping centre in that location.
- 3.14 North-west of the site lies a building with leisure/business use. The boundary of the most western portion of the site is formed by the Gloucester and Sharpness Canal. dilapidated buildings, known as the Malthouse Extension and Transit Shed, are west of the north-western portion of the site; The Malthouse is intended to be developed into a residential building with associated parking.
- 3.15 South of the site lies a Costa café and 'drive-thru', a Premier Inn, and a building with commercial/leisure use on the lower floor and residential properties above.
- 3.16 Views out from the site are invariably glimpse views along Merchants Road and High Orchard Street, and down Baker's Street. The views comprise of narrow, enclosed roadways with short distance views terminated by the large-scale warehouse style buildings formed by the shopping centres and eateries surrounding the site.
- 3.17 The character of the site is therefore very industrial albeit in a commercial sense with a large dockyard scale to the architecture and narrow roadways between. This is characteristic of the historic docks and is reflected in the retrained building facades of several of the commercial units.

Historic Development

- 3.18 With reference to insert D below, the site is located within the High Orchard timber area of the docks. This docks in Gloucester were rapidly developed in the mid to late 19th century following the completion of the canal into Gloucester. South of the Site was a railway line which linked the many warehouses to the canal and roads.
- 3.19 Today the scene is quite similar, however the building use has changed from industrial to leisure/commercial and residential. The railway line south of the site has been removed and is now broadly in the same location as St Ann Way.



Insert E: Red star indicates approximate location of Site in 1881-1883 Map⁸

Environmental and Conservation Designations

- 3.20 The Site does not fall within any statutory or local landscape designations. The only designations are economic planning designations as mentioned above (refer to Section 2 of this report).
- 3.21 There are no public rights of way through the site itself. The closest being the Wysis Way long-distance route runs along a portion of Llanthony Road, approximately 350m north-east of the site before weaving through the historic docks and away along

⁸ <https://maps.nls.uk/view/101453445>

the River Severn. The Gloucestershire Way and Severn Way long distance routes both run in the west/north-west of the site.

4. EFFECTS ON TOWNSCAPE ELEMENTS

- 4.1 The effects on townscape elements include the direct physical change to the fabric of the land such as the addition, removal or modification of landform, enclosure, massing and scale or public realm within the Application Site itself (Refer to Figure 4 for the Aerial Photography of the surrounding townscape).

Topography

- 4.2 The Proposed Development falls within a brownfield site which is defined by the remains (preserved wall sections) of the former Downings Malthouse which are to be incorporated into the new development and areas of hardstanding (car parking and public realm) in the western parcel. The existing ground levels across are relatively flat at c.14m Above Ordnance Datum (AOD) and reflect the topography of the adjacent land (refer to Figure 2). The canal adjacent to the Site represents the similar level gradient as within the Site at a marginally lower AOD. The levels of the road infrastructure to the north, and south, are fractionally higher than the Site as they progress over the canal and with the trunk road flyover sections on the A430. The ground generally rises to the east of the site with a higher landform at Robinswood Hill, approximately 2.75km to the south-east, rising to a height of c.200m AOD.
- 4.3 The value of the Site topography is considered to be low and its susceptibility to change low as well, with the adjacent land being already altered by modern developments and its current state being highly neglected and derelict. Overall, the sensitivity of the landform within the Site and its setting is assessed as low.
- 4.4 The footprint of the built form would be less than that which was historically present on the site, the introduction of the basement parking would require adjustment to the landform but this would not be evident from the surroundings due to the public open spaces and building entrances being in-line with the surrounding ground floor heights. The existing parking / public realm on the western parcel would be retained and thus there would be limited perceived change to the existing ground topography. The Proposed Development is therefore considered to bring about a negligible magnitude of change. The significant effects upon the Site's ground topography is therefore judged to be negligible and neutral.

Enclosure

- 4.5 The degree of enclosure is partly a function of the building heights and massing in relation to the intervening space between them.

- 4.6 The built form within the northern Site comprises of remains of the warehouse boundary walls that range from one to four storeys. These enclose the site to varying degrees, with the Downings Kiln building being the most complete. The site was clearly historically very enclosed, entirely filling the space between Merchant's Road and High Orchard Street. These two roads are also very enclosed in nature, with approximately four storey buildings along the majority of their lengths. In the case of High Orchard Road, this narrow enclosure is formed by the Gloucester Quays shopping centre façade and the Cineworld Building – both presenting continuous built edges. Similarly, the sense of enclosure along Merchants Road is almost continuous with converted warehouse structures flanking the street. The exception to this is the open plaza in front of 'Coal' grill and bar.
- 4.7 The townscape to the south of the site and including the western parcel, is more open with spaces between individual buildings. The sense of enclosure is less intense, but still present, formed by large-scale industrial and historic (restored and regenerated) buildings, alongside some modern warehouse style buildings such as the Premier Inn and Costa Drive-Thru. The open space presented by the existing car park and plaza allows connection to the waterfront and Llanthony Secunda Priory beyond.
- 4.8 Vegetation is barely present in the immediate surroundings of the site. Small verges with occasional street trees are located between the site and the main roadway – St Ann Way to the south. These contribute to a limited sense of openness in this aspect.
- 4.9 The value of the enclosure is considered to be low and its susceptibility to change low as well. Overall, the sensitivity of the landform within the Site is assessed as low.
- 4.10 The Proposed Development will result in a notable increase in height for the built environment. The Downing Tower forming a new feature in the sense of enclosure when viewed from a distance. In the immediate vicinity however, the presence of the two buildings in the streetscapes, broken-up with a parking area (in the northernmost area) and the cut through between the two buildings will be both fitting and sympathetic to the existing sense of enclosure.
- 4.11 The tower would be perceived most when experienced from the southern approach where the increase in openness is proportional to the additional height, the open car park areas and highway verges allow the scale of this additional height to be absorbed amongst the more scattered warehouse type buildings in this localised

area. Additionally due to the relatively small footprint of the tower, this is not considered to create a strong sense of enclosure.

- 4.12 Overall, it is acknowledged that the sense of enclosure would change. The enclosed spaces within the Proposed Development will be similar to the wider commercial area, and there would be more breaks in the street facade. The tower feature would create a distinct feature in the wider townscape but not alter the sense of enclosure in a literal sense. It is therefore considered that both adverse and beneficial impacts would result from the development, and overall this would result in a low adverse magnitude of change, leading to a minor adverse significance of effects.

Massing and Scale

- 4.13 The buildings in the area of the Docks are invariably large and commercial in scale and character. Several of the buildings throughout the dock area are of 6 and 7 storeys with Britannia Warehouse to the north and Alexandra Warehouse to the north-west at 8 storeys. The footprint of many buildings in this local area are also extensive in length with Cineworld being c.99m long, and the façade of Gloucester College facing the waterfront measuring c.130m in length.
- 4.14 Whilst many of the warehouses/wharfs present solid frontages being attached to neighbouring properties, some are isolated in open hard surfaced expanses – invariably now used for parking and occasionally for public open space. These open spaces compliment the grandeur of the larger buildings, whilst the narrow streets formed by the long narrow buildings create the historic sense of docks experienced in many Docks throughout the Country (London City Docklands, Portsmouth Dockyard & Gunwharf Quays).
- 4.15 The value of the massing and scale is considered to be low and its susceptibility to change low as well. Overall, the sensitivity of the massing and scale within the Site is assessed as low.
- 4.16 The mass and scale of the Proposed Development is going to be taller and less dense than what historically existed on the site. The increase in height for the Tower element, whilst creating a taller feature than any existing in the current Dock roofscape, it is considered to be relatively comprehensible when experienced in the context of the openness to the south and thus presenting a more open setting for a taller building as seen elsewhere in the Docks; and also in relation to the horizontal scale of surrounding buildings to the north.

- 4.17 The openness of the northern parcel of development will create a distinction for the two buildings which will improve the dense massing of the two streetscapes – High Orchard Street and Merchant's Road.
- 4.18 It is therefore considered that both adverse and beneficial impacts would result from the development, and overall this would result in a low adverse magnitude of change, leading to a minor adverse significance of effects.

Movement

- 4.19 The Site is privately owned and there is limited public access at present only in the southern parcel. The highways to the east and between the two sites are accessible by vehicles only up to the northern boundary and for deliveries only beyond this point, therefore traffic is limited. The nearest notable highway is St Ann Way 100m to the south. Vehicular movement around the southern parcel is greater, with it being an existing car park and adjacent to a further parking area. There is however no through traffic in either area.
- 4.20 Pedestrian movement however is possible adjacent to the site with regular pedestrian passage in the areas of public realm, especially in relation to the shopping centre. The roadways are largely pedestrianised directly to the north of the site.
- 4.21 The value of the movement is considered to be low and its susceptibility to change low as well. Overall, the sensitivity of the movement within the Site is assessed as low.
- 4.22 The Proposed Development would introduce a residential development, small public realm spaces and improved permeability between buildings via the cut through, in an area which is currently derelict and largely inaccessible. This would help integrate the Site into its surroundings.
- 4.23 It is therefore considered that beneficial impacts would result from the development, and overall, this would result in a low beneficial magnitude of change, leading to a minor beneficial significance of effects.

Hard and Soft Landscape

- 4.24 There is no soft landscaping on the site at present. The open space in the southern parcel is formed of a temporary crushed aggregate surface, barren of any features, with the exception of some timber picnic benches and stone blocks to prevent illegal parking.

- 4.25 The proposed development would introduce an improved area of public realm along the waterfront framed by a hedgerow, as well as some minor planting in the new car park of the western parcel, and the high quality cut through in the northern parcel with some small elements of planting. It is considered that the site has a low sensitivity to changes in the hard and soft landscaping.
- 4.26 The new area of public realm in the northern parcel would visually enhance the streetscene. The proposed development is therefore considered to be beneficial to the hard and soft landscaping. This would result in a low beneficial magnitude of change. On that basis the significance of effects upon the hard and soft resource is assessed as major beneficial.

5. EFFECTS ON TOWNSCAPE CHARACTER

5.1 The assessment of effects on townscape character considers how the introduction of the proposed built form alters the urban structure, scale, mass, and pattern of built form and open space, or how interconnectivity of the Proposed Development changes the way in which the character of a particular area is perceived.

Project-Specific Townscape Character Areas

5.2 In order to review the character of the local townscape the immediate surroundings up to 1km in all directions were explored. Given the context, landform, built structures and vegetative cover, in our professional opinion, it was considered that beyond this distance, views and interconnectivity of the Proposed Development would be extremely unlikely to result in significant adverse impacts. Therefore, the study area extent was set at this radius for this element of the assessment.

5.3 The Townscape Character Assessment: Gloucester, published by Gloucester City Council in June 2019 notes that *'Many of Gloucester's surviving historic industrial buildings can be found in the area of the Docks with a number of the tall warehouses still existing around the main basin, most of which are listed. There are also other industrial buildings surviving in the Docks area including flour mills and malt houses. Modern industrial buildings within Gloucester tend to be as in most places, non-descript, large scale structures that are often indistinguishable from retail structures'* (p.16-17).

5.4 Whilst the site lies just outside of the Docks Conservation Area boundary, some context can be taken from the appraisal; key characteristics of the Character Area 3: Baker's Quay and Llanthony Quay include:

- *'Large brick industrial buildings on Baker's Quay two of which project over the towpath supported on a row of cast-iron pillars;*
- *Buildings in Merchants Road set at the road edge;*
- *Cavernous sense of enclosure between the Downing's buildings and the south end of Merchants Road'* (p.14)⁹.

⁹ The Docks Conservation Area (Conservation Area No. 3) Appraisal and Management Proposals, by Gloucester City Council.

- 5.5 Furthermore, it is noted that *'Baker's Quay, within the conservation area, is characterised by its former manufacturing uses as opposed to the warehouses and goods distribution characteristic of the docks'* (p.14).
- 5.6 The Site is classified as 'Urban' in the Forest of Dean District Landscape Character Assessment, as noted previously. For the purposes of this assessment, three project-specific Townscape Character Types have been identified based on professional judgement, fieldwork and background research. Insert F identifies three different Character Areas which are most evident in the Site area and which could be affected by the Proposed Development. The Character Types are as follows:



Insert F: Project-Specific Townscape Character Areas

- 5.7 Two predominant townscape character types influence this area, the industrial and commercial character with large scale buildings, albeit that several are converted into residential dwellings, and the residential areas which are dominated, almost exclusively by smaller scale residential houses and smaller apartment blocks.
- 5.8 The Industrial and Commercial spaces invariably contain large expanses of hard surfaces between the large scale built form, and relatively low levels of green space

or vegetation. Several of the modern additions to this character of townscape are aesthetically unsympathetic to the historic dock area but portray a similar character type and intended use.

- 5.9 The residential areas invariably contain more intimate scale of building – often two storey terraces with some front and rear gardens, and on street parking. The gardens and pocket parks provide opportunities for vegetation which also softens the streetscape and the experience of the areas. Given the separation between the site and the residential character areas, this is not given further assessment
- 5.10 The third project-specific character type identified is that of open green spaces; this relates to accessible spaces of significant size which can be used for recreation. This includes Gloucester Park, Castlemeads, and the grounds of Llanthony Secuda Priory; whilst contrasting in size and form, these spaces provide key destinations for the population to experience outdoor recreation in open green spaces. All host mature trees and well-established vegetation which partially filter the impacts (noise, pollution, wind) of the surrounding urban environment. Given the setting of the open green spaces within the urban and highly developed townscape, this character type is not given further assessment.
- 5.11 The value of the overall townscape is considered to be medium and its susceptibility to change medium as well. Overall, the sensitivity of the townscape in direct proximity to the Site is limited to the Industrial and Commercial area and is thus assessed as low.
- 5.12 The proposed Malthouse building is considered to be in-keeping in scale, massing and material with the adjacent townscape type. The proposed Tower building will be taller than the existing previous building within the Site and many of the buildings within the area. The size and scale of the proposed Tower building will enable it to form a new feature in this area of Bakers Quay whilst complimenting the character of the area. As noted previously, the southern, more open aspect will allow it to be experienced at a medium distance where it can be seen in full, in addition to this, the proposed structure includes open elements at its apex, and pillars elevating the entrance area thus avoiding a solid and imposing form. Furthermore, the proposed Tower reflects the horizontal proportions of the long slender buildings to the north, by creating a long, slender form in a vertical orientation to complement the existing architecture.

- 5.13 Overall, it is acknowledge that the proposed development, in particular the Tower, introduces a new feature within this townscape, it is considered that the elegant and light form will sympathetically compliment the character area.
- 5.14 It is considered that adverse impacts would result from the development, and overall, this would result in a low beneficial magnitude of change, leading to a minor beneficial significance of effects.

6. EFFECTS ON VISUAL AMENITY

6.1 The effects on visual amenity consider the changes in views arising from the proposals in relation to visual receptors including residential properties, highways, PRoW, and recreational assets, and the effect on representative viewpoints or specific locations within the study area. Visual amenity is defined in GLVIA3 as:

*'...the overall pleasantness of the views people enjoy of their surroundings, which provides an attractive visual setting or backdrop for the enjoyment of activities of the people living, working, recreating, visiting or travelling through an area.'*¹⁰

6.2 Two site visits were carried out in late April 2022, photographs from this fieldwork have also been used to inform the assessment of effects upon the local landscape character. Desktop research was undertaken to identify potential receptors, and during these visits these were clarified and recorded. Detailed description of the receptors and analysis of the predicted effects on views are provided below.

6.3 Using each of the building heights stated in the Architects drawings, a Zone of Theoretical Visibility (ZTV) was produced using Geographic Information Systems (GIS) software, refer to Figure 5. The fieldwork was used to verify these views or lack of inter-visibility with the Site, and to verify the appropriateness of the study area and ZTV. Unrestricted views of the Site are limited to the immediate environs with intervening built form, vegetation and road alignment controlling views towards the Site. In summary, direct and unrestricted views of the existing Site are limited to users of the residential and commercial properties facing directly into the Site, road users (including pedestrians), and users of the existing adjacent car parks to the south.

6.4 The identified viewpoints (refer to Figure 6 – Viewpoint Location Plan, and Figure 7 – Viewpoint Photographs) are not intended to cover every single possible view and are focused around the areas where some level of inter-visibility has been predicted. Due to the limited opportunities to gain views of the Site their location is necessary selective and illustrative rather than being representative.

6.5 The construction stage would be of relatively short duration and although relevant any potential effects would be similar or lower to those identified once the Proposed Development has been completed. Therefore, this assessment focuses on the effects of the proposals post completion at Year 1. Due to the minimal quantity of proposed

¹⁰ Glossary, Page 158, GLVIA, 3rd Edition

planting, no further assessment is made for Year 15 when trees would have matured, and planting have become established.

Illustrative Viewpoints

- 6.6 The susceptibility of visual receptors will inevitably vary depending on the context, sense of enclosure, and presence or lack of large scale and massing of the built form in the immediate environs, i.e. points of reference. In the majority of cases the susceptibility is assessed as low. On that basis, the sensitivity of the receptors at the selected viewpoints will vary between high and medium.

Viewpoint 1 – Merchants Road

- 6.7 Users of this (mainly) pedestrianised road gain views of the retail units in converted Bakers Quay buildings on either side as they progress along their journey. They gain occasional glimpses of the canal in gaps between the buildings. They gain localised views of the existing sites northernmost facade, largely concealed by scaffolding, when in close proximity to the site. This is seen in the context of the other historic buildings along this narrow roadway.
- 6.8 Given the predominant land use – retail/commercial – it is assumed that these receptors are not present solely for the purpose of enjoying the views, therefore, the sensitivity of the receptors along this road is assessed as low.
- 6.9 The proposals would be clearly visible when in close proximity to the Site but would form a brief feature in the view and be largely concealed behind the adjacent buildings. The main features perceived by these pedestrians would be the retained maltings walls and new northern building – Downing Malthouse, as well as the upper elements of the Downing Tower within the skyline, beyond the intervening Cineworld building. The careful selection of building materials (light-red brickwork) to complement the retained existing walls and surrounding vernacular would allow the proposed buildings to blend appropriately into the streetscape.
- 6.10 The Proposed Development is considered to be a positive intervention and addition to the view. It would bring a medium beneficial degree of change, on the basis that it reinforces the presence of sympathetic contemporary architecture to the local townscape. This would result in minor beneficial significance of effects due to the removal of the derelict existing buildings and unsightly scaffolding. By increasing access and permeability into and through the northern parcel, the development will improve the receptors experience of this area, and it will be perceived as more welcoming and be complementary to the streetscene.

Viewpoint 2 Baker Street

- 6.11 Users of this highway and Premier Inn hotel, gain views of the modern Gloucester Quays shopping centre, the hotel car park with associated grass verges and highway infrastructure. The view panorama includes the listed Malthouse Extension building (adjacent to the site) and views across the Canal to the Scudamore Place retirement apartments. These receptors also gain direct views of the site in the middle distance beyond the small street trees on Baker Street.
- 6.12 Similar for viewpoint 1, the sensitivity of the receptors at this location is assessed as low.
- 6.13 The proposed development (refer to Figure 8 – photomontages) will be clearly visible in the architecturally diverse existing view. The Tower building will form a tall feature which will protrude into the skyline above the surrounding large-scale buildings; the careful selection of building materials (light-red brickwork), and the elegant roof apex would allow the proposed buildings to compliment and reinforce the positive aesthetics represented by the Malthouse Extension building within the view, and help to redress the imbalance presented by the Gloucester Quays construction.
- 6.14 Therefore, it is considered that these receptors would experience a combination of adverse and beneficial impacts as a result of the development. In our professional opinion, the overall balance would result in low beneficial magnitude of change, thus resulting in a minor beneficial significance of effects.

Viewpoint 3 – Canalside West

- 6.15 This view represents residents in Scudamore Place retirement apartments and users of the public realm for pedestrians walking along the waterfront. These residents and users gain views north and south along the canal across to numerous historic dock buildings within the Conservation Area and across to Llanthony Secunda Priory, but also including several more modern industrial style buildings and Gloucestershire College. Views across towards the site include the Gloucester Quays car park façade and the Premier Inn hotel, but also the sympathetically restored/converted Provender Apartments, and the Malthouse Extension building. The western parcel of the site is clearly visible as the car park and gravelled open space, in direct view on the opposite site of the canal. Whilst this view is oblique to the direction of travel, it is considered that these receptors could be in this area specifically to enjoy the quality of the view across and along the water.
- 6.16 The sensitivity of the residential receptors at this location is assessed as high.

- 6.17 The proposed changes to the western parcel would lead to a minor change in the view, with the introduction of a hedgerow which would obscure some of the car parking and soften the panoramic view (refer to Figure 8 – photomontages).
- 6.18 The proposed Tower building would be clearly visible at a short distance (35m), partially behind the Malthouse Extension building. The Tower building will form a tall feature which will protrude into the skyline above the surrounding roofscape; the careful selection of building materials (light-red brickwork), and the elegant roof apex would allow the proposed buildings to compliment and reinforce the positive aesthetics represented by the Malthouse Extension building and the Provender Apartments within the view, and help to redress the imbalance presented by the Gloucester Quays construction.
- 6.19 Therefore, it is considered that these receptors would experience a combination of adverse and beneficial impacts as a result of the development. In our professional opinion, the overall balance would result in low adverse magnitude of change, thus resulting in a moderate adverse significance of effects. Views up and down the Canal and across the Conservation Area remain.

Viewpoints 4a & b – St Ann Way (West and Bridge)

- 6.20 This receptor group is formed of road users travelling in an easterly direction along the highway. Views for road users towards the Site are almost entirely screened by the intervening residential dwellings. As the receptors progress along their journey in the direction of the site they gain brief oblique views between the Malthouse Extension building and the Provender Apartments when on the bridge. The predominant view on this bridge is up and down the canal itself however where far reaching views are afforded to the historic Docks, including the tower of Gloucester Cathedral and the spire of St Nicholas Church to the north, and to the open countryside to the south.
- 6.21 The sensitivity of the receptors at this location is assessed as low.
- 6.22 The views of the proposed development would be limited to the proximity of viewpoint 4b, with the Tower being only briefly in clear direct view, and at an oblique angle to their direction of travel. This glimpse would be gained also progressing passed the junction with Baker Street. As noted in the previous views, the sensitive use of materials and building form will allow this tall building to compliment the existing historic fabric. The proposed roof apex will complement the roofline of the Provender Apartment building. Given the distance, the height of the tower will also

be visually depleted by the perspective and thus will not, in our professional opinion, appear to contrast with the scale of the existing architecture in the foreground. Views to the proposed hedgerow in the western parcel will also be visible and will soften the view along the waterfront to some degree.

- 6.23 Therefore, it is considered that these receptors would experience a combination of adverse and beneficial impacts as a result of the development. In our professional opinion, the overall balance would result in low adverse magnitude of change, thus resulting in a minor adverse significance of effects. Views up and down the Canal and across the Conservation Area remain, including to the Gloucester Cathedral Tower and the St Nicholas Church spire.

Viewpoint 5 – Llanthony Lift Bridge

- 6.24 Users of this road bridge gain direct views up and down the canal similar to those set out for view 4b. The immediate views to the north comprise entirely of the Gloucester Docks Conservation Area with historic warehouses, and views through to the Town Hall, and the St Nicholas Church spire beyond. Views to the south are framed by the more diverse linear built form to the east and west and the long distant countryside to the south. These views are oblique to the direction of travel, but given the quality of the views and the location within the Conservation Area, it is considered that these receptors would potentially pause/slow down deliberately to enjoy the view. There are no views directly into the site due to the intervening buildings in the foreground.
- 6.25 The sensitivity of the receptors at this location is assessed as medium.
- 6.26 There would be no views of the proposed development due to the intervening buildings (refer to Figure 8 – photomontages) as such, they are given no further assessment.

Viewpoint 6 – Gloucester Park

- 6.27 Users of this park gain open views within the grassland of the park, views beyond are highly screened by the mature vegetation. It is also considered that, during the winter months, when the trees would not be in leaf, due to the distance and intervening buildings, this receptor group will not gain views to the site or of the proposed development as such, they are given no further assessment.

Viewpoints 7 – Canalside & Quayside Way

- 6.28 Residents and users of the waterfront path, gain far reaching views along the canal, and across to the large-scale industrial warehouses on the eastern side of the waterway. This eastern view includes several historic brick chimney features. Views to the north in the direction of the site include the St Ann Way bridge, but the historic dock buildings are not perceptible at this distance. The tower of Gloucester Cathedral and the Spire of St Nicholas Church are barely perceptible also in the skyline.
- 6.29 These residential receptors are assessed to have a high sensitivity.
- 6.30 These residents will potentially gain minute views of the upper tip of the proposed tower apex beyond the intervening vegetation and warehouse buildings. It is acknowledged that this will be in proximity to the glimpse view of the cathedral tower. This will be seen in the context of the large-scale of architecture directly east of the canal and numerous chimney features in the near and middle distant view. The distance of the receptor to the proposed development is c.750m.
- 6.31 The sensitive visually permeable design of the roofline of the Tower will minimise the visibility of the built form. Therefore, it is considered that these receptors, despite the change being almost negligible, given the proximity to the Cathedral tower in the skyline, would experience low/negligible adverse magnitude of change, thus resulting in a minor adverse significance of effects.

Viewpoint 8 – Llanthony Secunda Priory

- 6.32 This view represents users of the public grounds of the Priory, including the historic buildings and ruins, views across the canal to the Malthouse Extension building and Gloucester Quays car park. Their view also incorporates the Scudamore Place retirement apartments located off St Ann Way to the south-east. The open parkland contains several mature trees, and thus views across the water are filtered to some extent.
- 6.33 This receptor group is located setting of a heritage building and therefore their sensitivity is assessed as medium.
- 6.34 The proposed changes to the western parcel would not be perceptible at this distance and elevation. However, the proposed tower would be barely visible beyond the mature tree cover. The sensitive selection of materials would also visually blend the Tower in with the Malthouse Extension building when viewed through the canopies of the trees, the elegant visually permeable apex of the roofline would also minimise

the visual massing of the upper storeys. The alternative views would be retained including all aspects of views to the historic buildings and ruins.

6.35 Therefore, it is considered that these receptors would experience low adverse magnitude of change, thus resulting in a minor adverse significance of effects.

6.36 Viewpoint 9 – A430

6.37 Users of this busy highway gain limited views along the roadside, within the mature vegetated banks framing their view on each side and they enter the city centre on this main trunk route. These receptors are 2.4km from the site. It is also considered that, during the winter months, when the trees would not be in leaf, due to the distance and intervening buildings, this receptor group will not gain views to the site or of the proposed development as such, they are given no further assessment.

Viewpoint 10 – Robinswood Hill Country Park

6.38 Recreational users of this park gain exceptional panoramic views of the City of Gloucester and the open countryside beyond. The views include the low lying modern industrial rooftops and taller brick historic Dockyard townscape, as well as the Cathedral Tower and St Nicholas Church spire. The site is barely visible to the naked eye at this distance of over 3km.

6.39 The sensitivity of the receptors at this location is assessed as medium. This location is a Site of Specific Scientific Interest (SSSI), a Local Nature Reserve and has a Green Flag Award as well as being a designated Country Park.

6.40 The Proposed Development will be almost entirely obscured by other features in the vast panorama, but the Tower will be perceptible amongst the roofscape of the Docks and protrude above the visible Malthouse Extension Building (adjacent and in front of the blue façade of Gloucester College). The sensitive selection of brickwork will integrate the new built form into the existing backdrop, formed partly of the dark green mature woodland of Castlemeads beyond. The change in the view will be a very small element in the extensive visible townscape.

6.41 Therefore, the magnitude of change is considered to be low adverse and the significance of effect minor adverse for this receptor group.

7. SUMMARY AND CONCLUSIONS

Summary

- 7.1 This Townscape and Visual Impact Assessment (TVIA) has been prepared on behalf of Rokeby Developments. in support of a planning application for a residential development proposed at the Downings Malthouse, Bakers Quay in Gloucester Docks. The Site occupies a two pockets of land within the dock area. The northern parcel is enclosed by roadways on three sides, beyond which lies an historical malthouse to the west, a modern shopping centre complex to the north and east, with a terrace of residential houses in the north-eastern corner. The western parcel of land fronts onto the canal with wharf buildings to the north and south (one renovated into residential apartments and one derelict) and a roadway along the eastern boundary. The Site is well connected to the surrounding infrastructure with St. Ann Way c. 100m to the south.
- 7.2 This TVIA has considered effects on townscape elements associated with the Site, townscape character of the local area, and visual amenity associated with the study area, and has included assessment of various street scenes and ten viewpoints.
- 7.3 The effects on townscape elements have considered effects upon the Site's topography, sense of enclosure, massing and scale, but also perception and pattern of movement. It has also included effects upon the hard and soft landscape associated with the Proposed Development. The topography of the Site has been assessed as subject to negligible-neutral effects. The sense of enclosure has been assessed as having minor adverse effects due to the height and mass of the proposed built.
- 7.4 The assessment of massing and scale being the most considered element given the size of the proposed Tower feature, has concluded that the Proposed Development would be in context with the existing vertical and horizontal townscape elements and lead to a minor adverse effect. The assessment acknowledges that a new feature in the townscape would be created, but that this is proposed in an appropriate mass and scale, and thus does not lead to 'significant' adverse impacts.
- 7.5 Similarly, with regards to the movement, the Proposed Development would lead to an improvement in this aspect of the townscape character and thus is assessed as a minor beneficial effect.
- 7.6 Finally, the Proposed Development would introduce various elements of soft landscaping where there currently is none, to this end the significance of effect would

be beneficial. This is further reinforced by the proposals for quality public realm at the cut through between the two proposed buildings.

- 7.7 With regards to the townscape character, the assessment identifies three Townscape Character types which are within the vicinity, however upon detailed research, only one was considered to be potentially affected. With reference to Insert F above, the development will create a landmark feature within a well-established, large-scaled, and dominant character of this townscape – the Industrial and Commercial character type. The proposed development as a whole will complement the existing Bakers Quay building fabric and reinforce some of its strongest characteristics.
- 7.8 In terms of views, only one receptor out of ten has been assessed as being subject to moderate adverse effects. These are the residents along the Canalside West – Scudamore Place Retirement Apartments – Viewpoint 3. This is due to the change in their view being notable, direct and in close proximity – 35m. There are some notable benefits, being the improvements to the western parcel, the introduction of the hedgerow concealing some of the car parking beyond. The presence of the Tower building using sympathetic materials to the historic Provender Apartments and the Malthouse Extension building will re-dress the unsympathetic Gloucester Quays car park and Premier Inn hotel building which currently form a key features in the view.
- 7.9 Receptors at two out of ten viewpoints have been assessed as being subject to beneficial effects due to the improvement in the view through the introduction of new higher quality architecture of more sympathetic material finishes, and the introduction of good quality areas of public realm and improved permeability. Receptors at four out of ten viewpoints have been assessed as experiencing minor adverse effect, due to the context provided by the existing large-scale built form and urban environment where the perception of the proposals has a very limited or no influence over the visual amenity. and there were three receptor groups were scoped out after the fieldwork or production of the photomontages.

Table 1: Summary of effects on Visual Receptors at Year 1 (spring/summer views):

Visual Receptor/ Illustrative Viewpoint	Susceptibility / Sensitivity	Magnitude of Change	Significance of Effect
1 Merchants Road	Low	Medium beneficial	Minor beneficial
2 Baker Street	Low	Low beneficial	Minor beneficial
3 Canalside West – Scudamore Place	High	Low adverse	Moderate adverse

4 St Ann Way	Low	Low adverse	Minor adverse
5 Llanthony Lift Bridge	N/A		
6 Gloucester Park	N/A		
7 Quayside Way - Canalside	High	Negligible / Low adverse	Minor adverse
8 Llanthony Secunda Priory	Medium	Low adverse	Minor adverse
9 A430	N/A		
10 Robinswood Hill Country Park	Medium	Low adverse	Minor adverse

Conclusions

- 7.10 On balance, taking into account the existing urban context and its character, and proposed changes to the Site, the Proposed Development has been considered to have minor adverse, and minor beneficial effects on the townscape. The effects are adverse because the Downing Tower building is tall in comparison to the surrounding building heights. However, it is considered in our professional opinion that it is similar and therefore sympathetic to its surroundings in overall scale and massing. This is further reinforced by the material selection and its immediate setting. Additionally, the effects are also beneficial as the proposed development will change the site's use to align with the adjacent residential properties to the south and south-west, thus reinforcing this aspect of the townscape.
- 7.11 In conclusion, the development has multiple beneficial effects. These are as follows:
- The Site is changing from a derelict site into a high quality residential development. This is in context to the surroundings and becomes a transition from the residential to the commercial settings.
 - The development will provide better permeability and movement along the eastern edge of the canal.
 - The development will create a sympathetic and exciting landmark feature in this historically ever-changing quay setting.
 - The development provides an opportunity to redress the imbalance of unsympathetic architecture within some of the modern developments within Bakers Quay.
- 7.12 The visual impacts are largely minor with the one exception of the small group of residents on Scudamore Place, where results are assessed as leading to a moderate adverse significance of effect. It is noted however that, through the assessment

process, this receptor group is also anticipated to gain some beneficial visual impacts from the development; and only residents of a small number of the properties would potentially experience the low adverse impacts. Furthermore, the mitigation incorporated into the proposals – enhancements of the woodland buffer planting and the selection of sympathetically coloured, quality building materials has ensured that this impact is kept to a minimum.

- 7.13 Given the townscape setting and the scale/design of the proposed development, it is our considered professional opinion, that overall the outcome of only one moderate adverse effect for a single receptor group comprising a very small number of residents, is proportionate to the potential beneficial effects in landscape character and visual amenity terms.

APPENDIX A: TVIA METHODOLOGY

1. LANDSCAPE AND VISUAL IMPACT ASSESSMENT METHODOLOGY

1.1 This Landscape and Visual Impact Assessment (LVIA) has been undertaken with regards to best practice, as outlined within the following publications:

- Guidelines for Landscape and Visual Impact Assessment (3rd Edition, 2013) - Landscape Institute / Institute of Environmental Management and Assessment;
- Visual Representation of Development Proposals (2019) - Landscape Institute Technical Guidance Note 06/19;
- An Approach to Landscape Character Assessment (2014) - Natural England;
- An Approach to Landscape Sensitivity Assessment - To Inform Spatial Planning and Land Management (2019) - Natural England.

1.2 GLVIA3 states within paragraph 1.1 that "*Landscape and Visual Impact Assessment (LVIA) is a tool used to identify and assess the significance of and the effects of change resulting from development on both the landscape as an environmental resource in its own right and on people's views and visual amenity.*"¹

1.3 GLVIA3 also states within paragraph 1.17 that when identifying landscape 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.*"²

1.4 GLVIA3 recognises within paragraph 2.23 that "*professional judgement is a very important part of LVIA. While there is some scope for quantitative measurement of some relatively objective matters much of the assessment must rely on qualitative judgements*"³ undertaken by a landscape consultant or a Chartered Member of the Landscape Institute (CMLI).

1.5 GLVIA3 notes in paragraph 1.3 that "*LVIA may be carried out either formally, as part of an Environmental Impact Assessment (EIA), or informally, as a contribution to the 'appraisal' of development proposals and planning applications.*"⁴ Although the proposed development is not subject to an EIA requiring an assessment of the likely significance of effects, this assessment is also titled as an LVIA rather than an 'appraisal' in the interests of common understanding.

¹ Para 1.1, Page 4, GLVIA, 3rd Edition

² Para 1.17, Page 9, GLVIA, 3rd Edition

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

⁴ Para 1.3, Page 4, GLVIA, 3rd Edition

1.6 The effects on cultural heritage and ecology are not considered within this LVIA.

Study Area

1.7 The study area for this LVIA covers a 5km radius from the site. However, the main focus of the assessment was taken as a radius of 2km from the site as it is considered that even with clear visibility the proposals would not be perceptible in the landscape beyond this distance.

Effects Assessed

1.8 Landscape and visual effects are assessed through professional judgements on the sensitivity of landscape elements, landscape character, visual receptors and representative viewpoints combined with the predicted magnitude of change arising from the proposals. The landscape and visual effects have been assessed in the following sections:

- Effects on landscape elements;
- Effects on landscape character; and
- Effects on visual amenity.

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

Table 1, Overall sensitivity of landscape and visual receptors				
		VALUE		
SUSCEPTIBILITY		HIGH	MEDIUM	LOW
	HIGH	High	High	Medium
	MEDIUM	High	Medium	Medium
	LOW	Medium	Medium	Low

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

⁵ Glossary, Page 158, GLVIA, 3rd Edition

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

- 1.11 The sensitivity of the landscape and visual receptor and the magnitude of change arising from the proposals are cross referenced in Table 9 to determine the overall degree of landscape and visual effects.

2. EFFECTS ON LANDSCAPE ELEMENTS

- 2.1 The effects on landscape elements are limited to within the site and includes the direct physical change to the fabric of the land, such as the removal of woodland, hedgerows or grassland to allow for the proposals.

Sensitivity of Landscape Elements

- 2.2 Sensitivity is determined by a combination of the value that is attached to a landscape element and the susceptibility of the landscape element to changes that would arise as a result of the proposals – see pages 88-90 of GLVIA3. Both value and susceptibility are assessed on a scale of high, medium or low.

- 2.3 The criteria for assessing the value of landscape elements and landscape character is shown in Table 2:

Table 2, Criteria for assessing the value of landscape elements and landscape character	
HIGH	<p>Designated landscape including but not limited to World Heritage Sites, National Parks, Areas of Outstanding Natural Beauty considered to be an important component of the country’s character experienced by a high number of people.</p> <p>Landscape condition is good and components are generally maintained to a high standard.</p> <p>In terms of seclusion, enclosure by land use, traffic and movement, light pollution and presence/absence of major infrastructure, the landscape has an elevated level of tranquillity.</p> <p>Rare or distinctive landscape elements and features are key components that contribute to the landscape character of the area.</p>
MEDIUM	<p>Undesignated landscape including urban fringe and rural countryside considered to be a distinctive component of the national or local landscape character.</p>

⁶ Glossary, Page 158, GLVIA, 3rd Edition

	<p>Landscape condition is fair and components are generally well maintained.</p> <p>In terms of seclusion, enclosure by land use, traffic and movement, light pollution and presence/absence of major infrastructure, the landscape has a moderate level of tranquillity.</p> <p>Rare or distinctive landscape elements and features are notable components that contribute to the character of the area.</p>
LOW	<p>Undesignated landscape including urban fringe and rural countryside considered to be of unremarkable character. Landscape condition may be poor and components poorly maintained or damaged.</p> <p>In terms of seclusion, enclosure by land use, traffic and movement, light pollution and presence/absence of major infrastructure, the landscape has limited levels of tranquillity.</p> <p>Rare or distinctive elements and features are not notable components that contribute to the landscape character of the area.</p>

2.4 The criteria for assessing the susceptibility of landscape elements and landscape character is shown in Table 3:

Table 3, Criteria for assessing landscape susceptibility	
HIGH	<p>Scale of enclosure – landscapes with a low capacity to accommodate the type of development being proposed owing to the interactions of topography, vegetation cover, built form, etc.</p> <p>Nature of land use – landscapes with no or little existing reference or context to the type of development being proposed.</p> <p>Nature of existing elements – landscapes with components that are not easily replaced or substituted (e.g. ancient woodland, mature trees, historic parkland, etc).</p> <p>Nature of existing features – landscapes where detracting features, major infrastructure or industry is not present or where present has a limited influence on landscape character.</p>
MEDIUM	<p>Scale of enclosure – landscapes with a medium capacity to accommodate the type of development being proposed owing to the interactions of topography, vegetation cover, built form, etc.</p> <p>Nature of land use – landscapes with some existing reference or context to the type of development being proposed.</p> <p>Nature of existing elements – landscapes with components that are easily replaced or substituted.</p> <p>Nature of existing features – landscapes where detracting features, major infrastructure or industry is present and has a noticeable influence on landscape character.</p>

LOW	<p>Scale of enclosure – landscapes with a high capacity to accommodate the type of development being proposed owing to the interactions of topography, vegetation cover, built form, etc.</p> <p>Nature of land use – landscapes with extensive existing reference or context to the type of development being proposed.</p> <p>Nature of existing features – landscapes where detracting features or major infrastructure is present and has a dominating influence on the landscape.</p>
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2.5 Various factors in relation to the value and susceptibility of landscape elements are assessed and cross referenced to determine the overall sensitivity as shown in Table 1.

Magnitude of Change on Landscape Elements

2.6 Professional judgement has been used to determine the magnitude of change on individual landscape elements within the site as shown in Table 4:

Table 4, Criteria for assessing magnitude of change for landscape elements	
HIGH	Total loss/gain of a landscape element.
MEDIUM	Partial loss/gain or alteration to part of a landscape element.
LOW	Minor loss/gain or alteration to part of a landscape element.
NEGLIGIBLE	No loss/gain or very limited alteration to part of a landscape element.

3. EFFECTS ON LANDSCAPE CHARACTER

3.1 Landscape character is defined as the "*distinct, recognisable and consistent pattern of elements in the landscape that makes one landscape different from another, rather than better or worse.*"⁷

3.2 The assessment of effects on landscape character considers how the introduction of new landscape elements physically alters the landform, landcover, landscape pattern and perceptual attributes of the site or how visibility of the proposals changes the way in which the landscape character is perceived.

⁷ Glossary, Page 157, GLVIA, 3rd Edition

Sensitivity of Landscape Character

- 3.3 Sensitivity is determined by a combination of the value that is attached to a landscape and the susceptibility of the landscape to changes that would arise as a result of the proposals – see pages 88-90 of GLVIA3. Both value and susceptibility are assessed on a scale of high, medium or low.
- 3.4 The criteria for assessing the value of landscape character is shown in Table 2.
- 3.5 The criteria for assessing the susceptibility of landscape character is shown in Table 3.
- 3.6 The overall sensitivity is determined through cross referencing the value and susceptibility of landscape character as shown in Table 1.

Magnitude of Change on Landscape Character

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

Table 5, Criteria for assessing magnitude of change on landscape character	
HIGH	Introduction of major new elements into the landscape or some major change to the scale, landform, landcover or pattern of the landscape.
MEDIUM	Introduction of some notable new elements into the landscape or some notable change to the scale, landform, landcover or pattern of the landscape.
LOW	Introduction of minor new elements into the landscape or some minor change to the scale, landform, landcover or pattern of the landscape.
NEGLIGIBLE	No notable or appreciable introduction of new elements into the landscape or change to the scale, landform, landcover or pattern of the landscape.

4. EFFECTS ON VISUAL AMENITY

4.1 Visual amenity is defined within GLVIA3 as the "overall pleasantness of the views people enjoy of their surroundings, which provides an attractive visual setting or backdrop for the enjoyment of activities of the people living, working, recreating, visiting or travelling through an area."⁸

4.2 The effects on visual amenity considers the changes in views arising from the proposals in relation to visual receptors including settlements, residential properties, transport routes, recreational facilities and attractions; and representative viewpoints or specific locations within the study area as agreed with the Local Planning Authority.

Sensitivity of Visual Receptors

4.3 Sensitivity is determined by a combination of the value that is attached to a view and the susceptibility of the visual receptor to changes in that view that would arise as a result of the proposals – see pages 113-114 of GLVIA3. Both value and susceptibility are assessed on a scale of high, medium or low.

4.4 The criteria for assessing the value of views is shown in Table 6:

HIGH	Views with high scenic value within designated landscapes including but not limited to World Heritage Sites, National Parks, Areas of Outstanding Natural Beauty, etc. Likely to include key viewpoints on OS maps or reference within guidebooks, provision of facilities, presence of interpretation boards, etc.
MEDIUM	Views with moderate scenic value within undesignated landscape including urban fringe and rural countryside.
LOW	Views with unremarkable scenic value within undesignated landscape with partly degraded visual quality and detractors.

⁸ Page 158, Glossary, GLVIA3

4.5 The criteria for assessing the susceptibility of views is shown in Table 7:

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

Magnitude of Change on Visual Receptors

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

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

5. DEGREE OF LANDSCAPE AND VISUAL EFFECTS

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

Table 9, Degree of landscape and visual effects				
		Sensitivity		
		HIGH	MEDIUM	LOW
Magnitude of Change	HIGH	Major	Major	Moderate
	MEDIUM	Major	Moderate	Minor
	LOW	Moderate	Minor	Minor
	NEGLIGIBLE	Negligible	Negligible	Negligible

6. TYPICAL DESCRIPTORS OF LANDSCAPE EFFECTS

6.1 The typical descriptors of the landscape effects are detailed within Table 10:

Table 10, Typical Descriptors of Landscape Significance of Effects	
MAJOR BENEFICIAL	<p>The landscape resource has a high sensitivity with the proposals representing a high beneficial magnitude of change and/or the proposed changes would:</p> <ul style="list-style-type: none"> - enhance the character (including value) of the landscape; - enhance the restoration of characteristic features and elements lost as a result of changes from inappropriate management or development; - enable a sense of place to be enhanced.
MODERATE BENEFICIAL	<p>The landscape resource has a medium sensitivity with the proposals representing a medium beneficial magnitude of change and/or the proposed changes would:</p> <ul style="list-style-type: none"> - enhance the character (including value) of the landscape; - enable the restoration of characteristic features and elements partially lost or diminished as a result of changes from inappropriate management or development; - enable a sense of place to be restored.

MINOR BENEFICIAL	<p>The landscape resource has a low sensitivity with the proposals representing a low beneficial magnitude of change and/or the proposed changes would:</p> <ul style="list-style-type: none"> - complement the character (including value) of the landscape; - maintain or enhance characteristic features or elements; - enable some sense of place to be restored.
NEGLIGIBLE	<p>The proposed changes would (on balance) maintain the character (including value) of the landscape and would:</p> <ul style="list-style-type: none"> - be in keeping with landscape character and blend in with characteristic features and elements; - Enable a sense of place to be maintained.
NO CHANGE / NEUTRAL	<p>The proposed changes would not be visible and there would be no discernible change to landscape character.</p>
MINOR ADVERSE	<p>The landscape resource has a low sensitivity with the proposal representing a low adverse magnitude of change and/or the proposed changes would:</p> <ul style="list-style-type: none"> - not quite fit the character (including value) of the landscape; - be a variance with characteristic features and elements; - detract from sense of place.
MODERATE ADVERSE	<p>The landscape resource has a medium sensitivity with the proposals representing a medium adverse magnitude of change and/or the proposed changes would:</p> <ul style="list-style-type: none"> - conflict with the character (including value) of the landscape; - have an adverse effect on characteristic features or elements; - diminish a sense of place.
MAJOR ADVERSE	<p>The landscape resource has a high sensitivity with the proposals representing a high adverse magnitude of change and/or the proposed changes would:</p> <ul style="list-style-type: none"> - be at variance with the character (including value) of the landscape; - degrade or diminish the integrity of a range of characteristic features and elements or cause them to be lost; - change a sense of place.

7. TYPICAL DESCRIPTORS OF VISUAL EFFECTS

7.1 The typical descriptors of the visual effects are detailed within Table 11:

Table 11, Typical Descriptors of Visual Significance of Effects	
MAJOR BENEFICIAL	The visual receptor is of high sensitivity with the proposals representing a high magnitude of change and/or the proposals would result in a major improvement in the view.
MODERATE BENEFICIAL	The visual receptor is of medium sensitivity with the proposals representing a medium magnitude of change and/or the proposals would result in a clear improvement in the view.
MINOR BENEFICIAL	The visual receptor is of low sensitivity with the proposals representing a low magnitude of change and/or the proposals would result in a slight improvement in the view.
NEGLIGIBLE	The proposed changes would be in keeping with, and would maintain, the existing view or where (on balance) the proposed changes would maintain the quality of the view (which may include adverse effects which are offset by beneficial effects for the same receptor) or due to distance from the receptor, the proposed change would be barely perceptible to the naked eye.
NO CHANGE/ NEUTRAL	The proposed changes would not be visible and there would be no change to the view.
MINOR ADVERSE	The visual receptor is of low sensitivity with the proposals representing a low magnitude of change and/or the proposals would result in a slight deterioration in the view.
MODERATE ADVERSE	The visual receptor is of medium sensitivity with the proposals representing a medium magnitude of change and/or the proposals would result in a clear deterioration in the view.
MAJOR ADVERSE	The visual receptor is of high sensitivity with the proposals representing a high magnitude of change and/or the proposals would result in a major deterioration in the view.

8. NATURE OF EFFECTS

- 8.1 GLVIA3 includes an entry that states "*effects can be described as positive or negative (or in some cases neutral) in their consequences for views and visual amenity.*"⁹ GLVIA3 does not, however, state how negative or positive effects should be assessed, and this therefore becomes a matter of professional judgement supported by site specific justification within the LVIA.

⁹ Para 6.29, Page 113, GLVIA 3rd Edition

APPENDIX B: FIGURES