



**Symmetry Park  
Gloucester West**

**Environmental  
Appraisal**

Prepared by:  
**The Environmental  
Dimension  
Partnership Ltd**

On behalf of:  
**Tritax Symmetry**

January 2020  
Report Reference  
**edp5060\_r001c**

## Contents

<b>Section 1</b>	Introduction and Planning Context .....	1
<b>Section 2</b>	Landscape and Visual Matters .....	3
<b>Section 3</b>	Ecology and Nature Conservation Matters .....	13
<b>Section 4</b>	Archaeology and Heritage Matters .....	19
<b>Section 5</b>	Summary of Key Findings .....	23

## Appendix

**Appendix EDP 1** Photoviewpoints

## Plans

- Plan EDP 1** Environmental Planning Context  
 (edp5060\_d002b 22 January 2020 GY/VP)
- Plan EDP 2** Landscape Character Context  
 (edp5060\_d004b 22 January 2020 GY/VP)
- Plan EDP 3** Extended Phase 1 Habitat Survey  
 (edp5060\_d006a 22 January 2020 ZH/ME)

*This version is intended for electronic viewing only*

	Report Ref: edp5060_r001			
	Author	Formatted	Peer Review	Proofed by/Date
001_DRAFT				-
001a_DRAFT				-
001b				210120
001c				220120

## **Section 1**

### **Introduction and Planning Context**

- 1.1 Tritax Symmetry has appointed The Environmental Dimension Partnership Ltd (EDP) to undertake landscape, ecology and heritage studies in relation to land west of Gloucester Road, referred to as Symmetry Park Gloucester West ('the site'), which is partly included in the draft allocation for employment in the Draft Stroud Local Plan as PS43.
- 1.2 This document considers the merits of the draft allocation, land but also the merits of the entirety of the southern field parcel which was included, together with the draft allocation area as site HFD012, within Appendix 3 of the Stroud District Council Strategic Assessment of Land Availability (SALA) New Sites Update Report November 2019,
- 1.3 EDP is an independent environmental consultancy providing advice to landowner and property development clients in the public and private sectors in the fields of landscape, ecology, heritage, arboriculture and masterplanning. The Practice operates throughout the UK from offices in Cardiff, Cirencester and Shrewsbury. Details of the Practice can be obtained at [www.edp-uk.co.uk](http://www.edp-uk.co.uk).
- 1.4 This document provides an overview of EDP's desk-top and field appraisals in relation to landscape and visual matters (**Section 2**), ecology and nature conservation matters (**Section 3**), archaeology and heritage matters (**Section 4**). Each appraisal considers the potential for extending the draft allocation to include the entirety of the southern field and includes a summary of key findings and recommendations for development.

*This page has been left blank intentionally*

## **Section 2**

### **Landscape and Visual Matters**

- 2.1 This section appraises the landscape character and visual amenity of the site and wider area and considers the landscape and visual potential for an extension to the draft allocation to include the whole of the site.

#### **Planning Policy**

##### ***National Planning Policy Framework Updated 2019***

- 2.2 At the heart of the National Planning Policy Framework (NPPF) is a presumption in favour of sustainable development. For landscape, this means recognising the intrinsic beauty of the countryside (paragraph 170) and balancing any ‘harm’ to the landscape resource with the benefits of the scheme in other respects.

##### ***Stroud District Local Plan Review – Draft Plan for Consultation (November 2019)***

- 2.3 Relevant draft policies in landscape terms are:

- Core Policy CP14: High Quality Sustainable Development;
- Core Policy CP15: A Quality Living and Working Countryside;
- Delivery Policy ES7: Landscape Character;
- Delivery Policy ES8: Trees, Hedgerows and Woodlands;
- Delivery Policy ES10: Valuing our Historic Environment and Assets;
- Delivery Policy ES12: Better Design of Places; and
- Spatial Vision: Area 5, Gloucester’s Rural Fringe Cluster.

- 2.4 Stroud District Council (SDC) Local Plan, Section 5, sets out the spatial vision for the future of Stroud District that responds more specifically to local priorities and issues. The district is split into eight areas; the site is located within Gloucester’s Rural Fringe, identified as a valuable green hinterland to the city, but which will continue to be an important employment focus for the District. The key priorities relevant to the design proposals are to conserve and enhance the area’s heritage assets and secure high quality, distinctive design, in keeping with local identity and character.

## **Methodology**

- 2.5 A Chartered Landscape Architect undertook a landscape character and visual appraisal of the site and surrounding area on 07 January 2019 in accordance with sector guidance<sup>1</sup>. This was informed by a desk-based review of landscape character assessment and environmental designations using web-based sources.
- 2.6 The purpose of these baseline investigations was to identify any potentially significant ('in principle') landscape or visual constraints to an extension of the draft allocation to include the whole of the southern field parcel.

## **Landscape Designations**

- 2.7 The site does not lie within any nationally or locally designated landscape. The site does lie within the setting of, and within view of, the Cotswolds Area of Outstanding Natural Beauty (AONB). The boundary of the AONB lies approximately 1.1km to the east of the site at its nearest point, as illustrated on **Plan EDP 1**.

## **Landscape Character**

- 2.8 The findings of the desk-based review and field survey are summarised on the Environmental Planning Context plan (**Plan EDP 1**) and the Landscape Character Context plan (**Plan EDP 2**).
- 2.9 As shown on **Plan EDP 2**, the site occupies two fields to the east of the M5 motorway and west of the B4008, and to the south of Javelin Park and west of Dobbies Garden Centre, which are located off Junction 12 of the M5.
- 2.10 The site's prevailing character can be described as follows (see Photoviewpoints at **Appendix EDP 1**):

### *The Physical Landscape*

- The site comprises two field parcels forming an L-shape. One large L-shaped field lies to the south and west of the Gloucester energy from waste plant, 'Javelin Park', with a second smaller field lying between Dobbies Garden Centre and the M5 to the north. Together they account for approximately 26.97 hectares (ha) of agricultural land. The site is physically contained by the M5 to the west and the B4008 to the east, which connects from Junction 12 serving Dobbies Garden Centre, Javelin Park and other employment units;

---

<sup>1</sup> Joint Nature Conservation Council (2010) *Handbook for Phase 1 Habitat Survey – A Technique for Environmental Audit* (reprinted with minor corrections for original Nature Conservancy Council publication).

- Local Plan allocations (Site Allocation SA4a – St Modwen Park Gloucester), Dobbies Garden Centre, Javelin Park, the M5 corridor itself and the railway corridor to the east, all represent the urban nature of this landscape baseline (see **Plan EDP 2**);
- At the time of the site visit (07 January 2020) **Photoviewpoint EDP A1.3** shows that the larger field parcel is currently used for arable crop, while the northern field is a former paddock overlooked by Dobbies Garden Centre (**Photoviewpoint EDP A1.2**), which was previously used as an overspill car park to garden centre;
- **Photoviewpoint EDP A1.3** illustrates the site's north-eastern boundary (adjacent to Javelin Park) defined by existing mature trees and comprising newly planted native trees within the Javelin Park development. Public access into this part of the site from the garden centre is now terminated;
- The eastern boundary (adjacent to the B4008) comprises hedgerow with some mature roadside trees and tree groups which provides greater containment and visual filtering of the site (**Photoviewpoint EDP A1.5**). The northern boundary, adjacent to Javelin Park, is formed by security fencing which contains existing hardstanding, excavated material and temporary construction buildings;
- The site's southern boundary is defined by pockets of scrub and few un-established trees interspersed along a low and frequently 'gappy' hedgerow (**Photoviewpoint EDP A1.6**) leaving it more exposed to views from the south-west and south; and
- The site's western boundary lies adjacent to the M5 motorway (**Photoviewpoint EDP A1.8**). The boundary is predominantly open, defined by a post and rail fence, with occasional scattered trees and low scrub vegetation;

#### *Cultural Heritage and Historic Landscape*

- The site has a cultural connection as an airfield (RAF Moreton Valence) prior to the construction of the M5 in 1960-70s and therefore does not present as an historic field pattern, nor does it contain historic landscape features, which can be frequently found to the east of the B4008 surrounding the village of Haresfield. According to the Gloucestershire County Council website, there are no public rights of way (PRoW) within the site; and
- Adjacent to the site to the south lies another large-scale open agricultural field (see **Plan EDP 2**), which was also part of the former airfield. There is a notable difference in field pattern beyond this, further south and east across from B4008, where there is a mosaic of smaller grazing and arable fields enclosed by hedging and containing occasional tree groups. These pockets of smaller piecemeal enclosure are located close to villages and have a sense of association with the local settlements.

### *Topography*

- The site is level throughout (**Photoviewpoint EDP A1.3**) with features existing only on the perimeter of the site, and man-made features such as overhead utilities running east-west within the northernmost field. Due to the site's open boundaries and limited vegetation for the most part, it is dominated by the large-scale energy from waste plant illustrated in **Photoviewpoints EDP A1.1** and **A1.3**. Other surrounding land-uses such as the garden centre, other retail units, car parking, vehicle traffic passing on the M5 motorway with associated road signage and lighting columns, contribute to a reduced landscape sensitivity; and
- The site topography does not present a barrier to development; the topography is typical of the surrounding area of the Rolling Agricultural Plain and Lowland Plain and its former use as an airfield. This minimises the need for cut and fill or retaining structures and allows for good masterplanning. The open and low-lying nature of the site is representative of the local landscape character, and can be found elsewhere to the south and west of the M5.

### *Landscape Fabric*

- The main character of the site (based on a review of aerial photography) comprises arable land, with no internal landscape features. The limited boundary vegetation (fragmented hedgerows, scattered trees, scrub vegetation) on/around the site provides a low degree of enclosure overall. The result of this is that the extent to which it is influenced by its urban setting is greater than would otherwise be the case.
- 2.11 At a National level, the site is located within National Character Area (NCA) 106: 'Severn and Avon Vales' whilst NCA 107: 'Cotswolds' lies approximately 1.1km to the east. The Severn and Avon Vales are described as *"The lower valleys of the rivers Severn and Avon dominate this low-lying open agricultural vale landscape made up of distinct and contrasting vales, including Evesham, Berkeley, Gloucester, Leadon, and Avon, with Cotswold outliers like Bredon Hill punctuating the otherwise flat vale landscape. The M5 motorway runs through the centre and the eastern edge of the area."*
- 2.12 At the County-level, the Gloucestershire Landscape Character Assessment (January 2006) identifies the site as falling within Landscape Character Type (LCT) 18: 'Settled Unwooded Vale' and Landscape Character Area (LCA) SV6A: 'Vale of Berkeley'. This LCA is described as an open, gently undulating landscape broadly bounded by the rising landform of the Cotswolds escarpment to the east and by the flat, low-lying floodplain landscape of the River Severn to the west.
- 2.13 The key characteristics that are considered relevant to the site and its landscape context are described as follows:
- *"Large scale, gently undulating landscape but with extensive almost flat areas commonly lying between the undulations;*



- *A combination of arable and pastoral agriculture;*
- *Number of small woodland blocks scattered throughout the vale also several orchards at the base of the escarpment;*
- *Strong rural character created by patchwork pattern of land uses and tree cover although the presence of several major transportation corridors in the area disrupt the rural tranquillity;*
- *Several clusters of Conservation Areas, features of interest in the area include Frampton Court Garden, a Grade II\* Registered Park and Garden, and the A38, which follows the route of an old Roman road. There are also two bowl barrows located to the south east of the settlement of Standish;*
- *Settlement forms a strong influence on the overall character of the Vale of Berkeley and there are numerous villages scattered;*
- *Beyond the villages within the Vale of Berkeley there are scattered farms and isolated clusters of dwellings in the wider landscape and farm buildings commonly punctuate the expansive views across the vale."*

2.14 At the Local-level, (albeit somewhat outdated now) is the Stroud District Landscape Assessment carried out in 2000. The site is located within LCT 5: 'Rolling Agricultural Plain' and more specifically within LCA 5b: 'Lowland Plain'. The adjacent LCAs include LCA 5a: 'Escarpment Foothills' to the east, LCA 5c: 'Frome River Valley' to the south.

2.15 The key characteristics are described as follows:

*LCT 5: Rolling Agricultural Plain*

- *"Varied landscape of open flat plain to more undulating landform towards limestone escarpment;*
- *Woodlands, mature hedgerow trees and occasional orchards;*
- *Traversed from north to south by M5, railway, Gloucester-Sharpness canal and the A38;*
- *Semi-enclosed landscape with some distance views, and more restrained from Frome Valley;*
- *Land use is a mix of arable and pasture;*
- *Strong field pattern medium to small scale;*

- *Small villages and hamlets dispersed over the landscape to form a relatively regular pattern;*
  - *Transport routes are a significant element in the landscape, although more concentrate in the Lowland Plain.”*
- 2.16 The key characteristics of Lowland Plain LCA are variously relevant to the site’s character, with notable points as follows:
- *“Relatively flat and gently undulating topography;*
  - *Expansive lowland plain;*
  - *Gravel terraces and head deposits;*
  - *Land use is predominantly used for arable farming;*
  - *Field pattern is larger scale and regular;*
  - *Mature oak trees within hedgerows and free standing;*
  - *Views are open.”*
- 2.17 On the whole, the site is broadly consistent with the character of the wider LCA, but there are many urbanising factors that serve to lessen the inherent sensitivity of the site to further development; namely the large adjacent energy from waste plant, Dobbies Garden Centre and car park and the adjacent main road infrastructure of the M5 motorway and B4008. These features ‘urbanise’ the site and its immediate locale and differentiate it from the more intact rural landscapes elsewhere in the area. Furthermore, landscape features such as mature boundary trees within hedgerows are less frequent in comparison to surrounding areas, given the former airfield use.
- 2.18 The assessment acknowledges new development at key settlements has already degraded some areas of the landscape, but the decommissioning of RAF bases presents *“opportunities for landscape gain”*.
- 2.19 The most sensitive aspects of the site – namely the sparse vegetated boundaries – can be retained within any proposal. These features would provide the framework for any future development, and also protect wider visual amenity and landscape character.

## Visual Amenity

2.20 The site's visual amenity is described below with reference to photoviewpoints at **Appendix EDP 1** and photoviewpoint locations illustrated on **Plan EDP 2**:

- In terms of visual context, the site is situated approximately 1.1km to the west of the Cotswolds (AONB), where the elevated landform of the Cotswold escarpment offers views over the low-lying Berkeley Vale (**Photoviewpoint EDP A1.9**). Some of these views are extensive and distant towards South Wales and the Severn Vale. However, it is noted that the heavily wooded nature of this section of the escarpment effectively blocks or filters views. Fieldwork confirms that, when viewed from the Cotswold Way at Haresfield Beacon (**Photoviewpoint EDP A1.9**), the site forms a small component of a much wider panorama and that the existing industrial buildings together with nearby buildings and the M5 place it within a more urban context;
- Due to the flat topography of the site and context, in combination with the adjacent M5 and large-scale energy from waste plant, intervisibility with areas to the west and north are limited. Views north are generally screened. The busy and noisy M5 is clearly visible from within the site, affecting tranquillity;
- North-westerly views beyond the motorway are heavily filtered by layers of field boundary vegetation and groups of trees in the local landscape set against the rising landform in the distance (**Photoviewpoint EDP A1.4**). In contrast, when viewed from locations to the west such as the M5, the openness of the site allows for leading views up and across the limestone escarpment to the east (**Photoviewpoint EDP A1.10** – Google Street View Screenshot);
- There are defining landmarks in the surrounding locality to be seen, mostly notably Haresfield Church. However, from within the site, views of the Church and settlement are largely filtered by the pockets of woodland, shelter belts, groups of trees and mature hedgerows across the intervening landscape;
- Visual amenity is informed by the underlying character of 'Lowland Plains', which is of an open flat plain predominantly used for arable farming but traversed by the M5, leading to more undulating landform towards the Cotswolds escarpment (see **Plan EDP 2**);
- Visual receptors include vehicles travelling along the M5 and the B4008, visitors to Dobbies Garden Centre and other retail units and users of the local rights of way network to the east and south-east of the site including the promoted route the 'Cotswold Way' and routes with the Cotswolds AONB. Owing to the density of well-treed hedgerows around the site and along the M5, publicly accessible views towards it are limited to those obtained close to it and those with intermittent elevated views on the Cotswold escarpment;

- Within close proximity of the site, man-made features, views of surrounding employment development, the containment of the M5 and B4008, and the general urban context of road signage and lighting columns, urbanise the site's character;
- Several local PRow extend from Haresfield Village in a westerly direction towards the site (see to **Plan EDP 2**). The nature of views from these PRow vary. Footpath Ref: Haresfield FP 3 runs east to west, centrally through the field from the Grade II\* Church of St Peter but, due to intervening field boundary vegetation, views of the site are heavily filtered (**Photoviewpoint EDP A1.7**). The majority of dwellings within Haresfield are situated to the east of the railway line and are therefore unlikely to experience views of the site;
- From the south, open views are available from the B4008, which passes the eastern boundary of the site. Mature vegetation and built form lie between the site and the village of Standish. Further south, views towards the site would be generally screened, some views may be obtained from slightly elevated ground such as along Standish Lane overpass (**Photoviewpoint EDP A1.8**); and
- Beyond these routes, the generally flat nature of the surrounding area in combination with mature hedgerows and tree belts, woods or plantations, and partial enclosure from existing settlements, mean that for all intents and purposes the site (and future development) will not be openly visible over the wider geographic area.

2.21 It is of note that there is not a significant difference in the visibility of the draft allocation area when compared to the wider site area in the descriptions of the views given above.

### **Setting of the Cotswolds AONB**

2.22 The site lies within approximately 1.1km of the Cotswolds AONB and has the potential to form part of its setting. Given the location of the site and its proximity to existing large-scale development, the M5 junction and corridor, and Dobbies Garden Centre with associated lighting sources, there are unlikely to be any significant effects to the setting of the Cotswolds AONB. Both the Secretary of State and Inspector Brian Cook, regarding the planning appeal in of the 'Energy from Waste' facility at Javelin Park (APP/T/A13/2200210) agreed in paragraphs 28-30 of the decision notice, that views towards the Cotswolds AONB and expansive views out from it together with the setting of the AONB would not be conflicted and it is considered that the same would be true of both the draft allocation area and the site as a whole.

2.23 In summary, effects of developing the site on views towards the escarpment would be localised, availability of views of the site from the AONB would be very limited by the wooded nature of the escarpment and industrial/commercial development and transport infrastructure that are key characteristics of the Vale landscape within which it lies.

### **Strategic Assessment of Land Availability 2019 and Draft Site Allocation PS43**

2.24 EDP considers the site to have a medium to low sensitivity, particularly in the northern portions where new development would relate well to the existing built form, providing some screening of the lower levels of Javelin Park but even in the more open areas to the south, views into the site are principally from a small visual envelope. There is the opportunity to improve the existing 'raw' edge of Javelin Park in a wider landscape framework.

2.25 This assessment confirms the findings of the council's assessment for site HFD012, within the 2019 SALA, Appendix 3 (Stroud District Council 2019), which states that (EDP emphasis added):

*"There are **no known physical constraints that would prevent development of this site.** The site is **level.** There are no known ground contamination or land stability issues. There is **good access to the B4008, A38 and M5 roads.** North end could provide **SuDS opportunity** reflecting that at Dobbies."*

2.26 The site falls outside of the Landscape Sensitivity Assessment (2016) which was commissioned to support the 2017 SALA. The 2019 SALA recommends (EDP emphasis added):

*"**Existing mounding and potential additional landscape buffer should reduce impact on flat open Severn Vale landscape and to stop further southward creep** into large open fields towards Standish."*

2.27 The assessment concludes that (EDP emphasis added):

*"...the site has **no overriding physical constraints or potential impacts preventing sensitively located development for employment uses** in the future should the Local Plan strategy identify the need for growth in this location. The site adjoins to east large commercial and waste incineration uses. Transport mitigation measures are likely to be required to facilitate sustainable access to the motorway and the wider area."*

2.28 The council have concluded that part of the site (Ref: Draft Site Allocation PS43) is suitable for development and have allocated it as an extension to the key employment site (Site Allocation SA4a – St Modwen Park Gloucester) for a development comprising 9ha employment and strategic landscaping (see **Plan EDP 2**). Notably the Council have placed reliance on the presence of the existing man-made mounding for only allocating part of the site for development. Based on the initial findings of this assessment, the remainder of the southern field within the site also represents an open, unconstrained parcel of land with good masterplanning opportunities and there are no 'in principle' landscape and visual reasons why the whole of the site area should not be included in the allocation.

## **Constraints and Opportunities**

- 2.29 There are very few significant constraints in landscape terms, the principal consideration being the interface with the motorway, outlying villages and historic landmarks (i.e. Grade II\* Church of St Peter). Retaining the legibility of the village core will also be a key consideration whilst creating new connections and complementary green spaces.
- 2.30 Whilst the character of the site has features that are typical of the Lowland Plain LCA and that can be enhanced, there are a number of opportunities to further develop that character through good design where the potential for adverse effects could be reduced:
- Opportunity to develop the green infrastructure of the site, connecting and creating habitats with tree, scrub and woodland planting and meadow grassland planting;
  - Give careful consideration to the location of buildings and building heights across the site to reflect adjacent built scale (particularly to the north-east responding to Site Allocation SA4a – St Modwen Park Gloucester) to ensure built form is complementary with the existing character;
  - Careful consideration with regard to colour and materials, in relation to the surrounding existing built form. The use of subtle colours and materials on the Javelin Park and St Modwen Park Gloucester development have been effective at blending the built form into the landscape and minimising visual effects particularly from long-distance elevated locations;
  - Integration of a sustainable urban drainage system (SuDS) into the design including swales and balancing areas and to include some permanent water bodies to increase biodiversity opportunities; and
  - Opportunity to increase the visual filtering of the lower level of the Javelin Park development thus improving views of the urban fringe in this area through boundary planting in the form of additional trees, hedgerows and understorey planting, including along western and southern boundaries to soften existing and proposed built form and invigorate the landscape at this location.
- 2.31 Whilst landscape enhancements can be achieved on the draft allocation area, there will be greater opportunity to incorporate more meaningful structural landscaping and green infrastructure if the full site area were to be included in the allocation. With the design of a robust and sensitive masterplan, EDP's conclusion is that the site is eminently suitable for an employment allocation in landscape terms and offers the additional opportunity to deliver landscape character improvements in the vicinity of Javelin Park.

## **Section 3**

### **Ecology and Nature Conservation Matters**

- 3.1 This section appraises the ecological environment of the site and wider area and considers the proposals in the context of current local planning policy and designated and non-designated ecological sites.

#### **Planning Policy**

##### ***National Planning Policy Framework Updated 2019***

- 3.2 At the heart of the NPPF is a presumption in favour of sustainable development. For ecology this means protecting irreplaceable habitats, conserving and enhancing biodiversity and securing measurable net gains in biodiversity (paragraph 175) and balancing any 'harm' to the ecological resource with the benefits of the scheme in other respects.
- 3.3 Policy ES6 of the emerging Stroud District Local Plan sets out the protections afforded to biodiversity within Stroud District. Policy ES6 Biodiversity and Geodiversity requires proposals to provide a net gain in biodiversity and to demonstrate that the mitigation hierarchy has been followed sequentially. The policy also requires developments to avoid impacts on internationally, nationally and locally designated habitats and protected species.

#### **Methodology**

- 3.4 A suitably experienced ecologist undertook an Extended Phase 1 survey on 10 January 2020 in accordance with sector guidance<sup>2</sup>. This was augmented with an ecological desk study using web-based sources and a request to Gloucestershire Centre for Environmental Records (GCER) for non-statutory designations and species records.
- 3.5 The purpose of these baseline investigations was to identify any potentially significant ('in principle') ecological constraints and opportunities to development proposed within the site.
- 3.6 Based upon established geographical value systems<sup>3</sup>, value is assigned by EDP within this Report on a scale of International/European (highest value) > National > County > District > Local > Site-level > Less than Local to ecological features.

---

<sup>2</sup> Joint Nature Conservation Council (2010) *Handbook for Phase 1 Habitat Survey – A Technique for Environmental Audit* (reprinted with minor corrections for original Nature Conservancy Council publication).

<sup>3</sup> CIEEM (2016). *Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater and Coastal*. Chartered Institute of Ecology and Environmental Management, Winchester.

- 3.7 Except where indicated otherwise, 'Priority Species' and 'Priority Habitats' refers to the list of species and habitats of principal importance for nature conservation; a list that is required to be in operation under Section 41 of the *Natural Environment and Rural Communities Act 2006*, and to which Local Planning Authorities must have regard when exercising their functions under Section 40 of the Act.

## Results

- 3.8 International designations include Ramsars, Special Areas of Conservation (SACs) and Special Protection Areas (SPAs. The data search revealed that there are four such designations within 15km of the site. Designations of national importance include National Nature Reserves (NNRs) and Sites of Special Scientific Interest (SSSIs). The data search identified four such designations within 5km of the site. Further information regarding the designations is provided in **Table EDP 3.1**.
- 3.9 The site lies within a SSSI risk zone. However, the risk zone is not applicable to employment allocations and developments and is not therefore a relevant consideration.

**Table EDP 3.1:** Designations with the Site's zone of influence

Designation Name	Distance and Direction from the Site	Main Interest and Features
Severn Estuary Ramsar SAC and SPA	5.8km south-west	The site is of importance for its estuarine habitats, as a route for migratory fish between sea and river systems and supporting migrating waders and large numbers of wintering water birds.
Walmore Ramsar and SPA	6.5km north-west	Designated for its seasonally flooded wetland area with a variety of habitats. This forms part of a series of sites within the Severn Vale, which, in winter, form an important refuge and feeding area for wildfowl.
Cotswold Beechwoods SAC	8.0km east	The site is designated for being the most westerly block of <i>Asperulo-Fagetum</i> beech forest in the UK.
Rodborough Common SAC	7.3km south-east	The most extensive area of semi-natural dry grasslands surviving in the Cotswolds of central southern England, and represents CG5 <i>Bromus erectus - Brachypodium pinnatum</i> grassland, which is more or less confined to the Cotswolds.
Cotswold Commons and Beechwoods NNR	4.6km east	These areas are designated for their beech forests and limestone grasslands.



Designation Name	Distance and Direction from the Site	Main Interest and Features
Edge Common SSSI	4.6km east	One of a series of unimproved Jurassic limestone grassland sites representing this formerly widespread habitat of the Cotswolds.
Frampton Pools SSSI	4.4km south-west	Open water habitat on a disused gravel pit. The site is of importance to wintering wildfowl.
Haresfield Beacon SSSI	2.1km south-east	Designated for its geological interests.

- 3.10 There are no non-statutory designations of County-level value or less (or other designations that should be considered at this level), within 1km of the site. There is one unconfirmed site within 1km of the site, which is Great Russel's Ground and is notable for its unimproved grassland, tall ruderal, marsh and ponds. Great Russel's Ground is located 360m north of the site on the opposing side of the M5. The ponds within Great Russel's Ground are over 500m away from the site.
- 3.11 The site contains no known Priority Habitat. However, 'Woodpasture and Parkland Priority Habitat' occurs in close proximity. This is relevant context for habitat enhancement/-creation proposals within the site.

### **Results: Habitats and Species**

- 3.12 The site comprises two fields, the larger southern field being arable land that has been planted with ryegrass and the small northern field supporting species-poor semi-improved grassland. The eastern boundary consists of a species-poor intact hedgerow with trees that had been box cut. The southern boundary consists of bramble scrub with trees that have been box cut. To the west of the site is a fence line behind which are mature trees and scrub patches, with the M5 motoway beyond. Within the east of the southern field is a large area of bramble scrub containing clearings of tall ruderal. The south-east of the site has a hardstanding track which leads further north to an area of bare ground that has been used during the construction of Javelin Park. There is a pond located 60m north of the site and no other ponds within 250m. The habitats are presented on **Plan EDP 3**.
- 3.13 The aforementioned habitats are considered by EDP to be of only Site-level (low) intrinsic nature conservation value or less, being limited in distinctiveness, extent, botanical species richness or a combination. The perennial ryegrass planted land is of negligible value. EDP considers that none of these on-site habitats/land uses represent 'in principle' (significant) ecological constraints that otherwise may preclude development.
- 3.14 It should be noted that the habitats are likely to support some protected and Priority Species populations/assemblages. However, the limited intrinsic value of the habitats present will, in EDPs opinion, limit the value of such species populations/assemblages; they are likely to be of only Local-level value or less.

- 3.15 The northern part of the site is allocated within the draft Stroud District Plan. In ecological terms, there is no in principle reason why the allocation couldn't be extended into the south of the site, there being no appreciable difference in the value of habitats between the areas that are included in the draft allocation and the area that is not.
- 3.16 The scope of further Phase 2 survey work for protected/Priority Species populations/assemblages required to support any future planning application, would be subject to consultation with the Local Planning Authority (LPA) Ecologist. A focused and proportionate survey programme for breeding birds, foraging bats and reptiles is likely to be required. The results of the Phase 2 survey work and consultations would influence the final masterplan proposals and enable the design of appropriate and proportionate levels of ecological mitigation measures in relation to faunal species but could readily be incorporated into a design for employment use and would not pose an in principle constraint to development.

### **Constraints and Opportunities**

- 3.17 Due to the spatial separation of the site from the habitat designations identified in the area of search these designations do not pose an 'in principle' constraint to development of the draft allocation area, nor of the site as a whole.
- 3.18 EDP considers that there are no 'in principle' (significant) ecological constraints posed by the habitats present on-site. These habitats are low in their intrinsic value and are unlikely to support either unique or exceptional species populations/assemblages.
- 3.19 Given the low intrinsic value of the habitats present, the site gives an opportunity to deliver a net biodiversity gain, ensuring planning policy compliance. These opportunities may include (but are not limited to) the following:
- New native tree/shrub/hedgerow planting to enhance the existing boundary network and create new hedgerows;
  - Creation of open green spaces that are suitable for wildlife including areas of wildflower;
  - Appropriate design of SuDS features (such as varying shelf profiles and aquatic planting) to increase biodiversity value; and
  - Ongoing management of existing enhanced habitats, and newly created habitats, in accordance with a management plan.
- 3.20 Whilst biodiversity gains can be achieved on the draft allocation area, there will be greater opportunity to incorporate more meaningful biodiversity gains if the full site area were to be included in the allocation. With the design of a robust and sensitive masterplan, EDP's conclusion is that the site is eminently suitable for development and offers the opportunity to deliver a net overall gain to local biodiversity. It will thus comply with all relevant

biodiversity and planning policy, wildlife legislation, and guidance at local and national levels.

*This page has been left blank intentionally*

## Section 4

### Archaeology and Heritage Matters

- 4.1 This section sets out the context of the site with regard to the designed and non-designated heritage assets within, adjacent to and in the wider context of the site.
- 4.2 A heritage and archaeology professional undertook a walkover of the site and its wider environs in 2019. The Gloucestershire Historic Environment Record was consulted in addition to on-line resources, which include the National Heritage List, curated by Historic England and on-line historic mapping websites.
- 4.3 The purpose of this assessment is to identify any 'in principle' constraints that may affect the potential delivery of the site for employment development and consider whether there would be any reason why the draft allocation might not be extended to include the whole of the southern field parcel.
- 4.4 The site contains no designated heritage assets where there would be a presumption in favour of their physical preservation.

#### Designated Assets

- 4.5 Designated heritage assets in the vicinity are illustrated on **Plan EDP 1**. The closest designated heritage asset is located c.220m to the west. It is separated from the site by the M5 and comprises a Grade II listed house (Hiltmead). There is a number of highly graded designated heritage assets within the settlement of Haresfield, c.800m to the east. These include 'The Mount' moated site, which is a nationally important scheduled monument, and the Grade II\* Church of St Peter. There are also several designated heritage assets in the wider landscape.
- 4.6 Both the draft allocation and the site as a whole have the potential to form part of the setting of all or at least many of these designated assets. However, EDP's initial assessment suggests, that whilst this may be the case, it is not considered that development within either the draft allocation or the wider site would cause a change within the setting of these assets such that their significance would be negatively affected. This assessment is in agreement with the council's own assessment for site HFD012 (Site A), within the SALA New Sites Update Report (Stroud District Council November 2019), which states that: "*An initial desktop heritage assessment of the site has indicated that there is potential to develop this site without harm to a designated heritage asset.*"
- 4.7 The SALA assessment concludes that: "*...the site has no overriding physical constraints or potential impacts preventing sensitively located development for employment uses in the future...*".

- 4.8 On this basis, it is not clear why the allocated area has been reduced (PS43; draft allocation) to merely wrap around the Javelin Park site when the assessment clearly identifies that there would be no potential impacts from the wider site.
- 4.9 It is the conclusion of this assessment that the wider allocation as originally assessed by the Council, i.e. the entirety of Site A (HFDO12), will have no greater effect on any heritage assets than the currently identified draft allocation PS43.
- 4.10 Should a planning application come forward for the site, it is recommended that an assessment of the potential for heritage effects, undertaken in line with Historic England guidance is compiled to accompany the application.

#### **Non-designated Heritage Assets**

- 4.11 With regard to non-designated heritage assets, consultation of the Gloucestershire Historic Environment Record has identified that there are no known archaeological records for the prehistoric or Roman periods within the site. The National Mapping Programme has identified several areas of former ridge and furrow cultivation within the site boundary from the study of aerial photographs, which could date to the medieval or post-medieval periods. However, this was not visible during a recent site visit and may only survive as buried archaeological features.
- 4.12 The site historically formed part of the Second World War airfield at Moreton Valance which was opened in 1939 and closed in 1962 (HER21459) and contains the remains of the former north-eastern runway and a length of the perimeter track (**Image EDP 4.1**)



**Image EDP 4.1:** Moreton Valence Airfield, the main runway is now the approximate alignment of the M5 with the site to the right, the north-west to south-east orientated secondary runway runs through the site area.

- 4.13 A geophysical survey (HER48741) and trial trench evaluation (HER48742) undertaken in connection with the Javelin Park site to the north, extended into the site and recovered two fragments of undated pottery and recorded a possible ditch and a furrow of unknown date.
- 4.14 Based on this preliminary assessment of the archaeological potential of the site, it is considered that the site is highly unlikely to contain features of anything other than local significance, should these survive. Of specific interest will be any surviving remains relating to the operation of the World War II airfield, the presence of which is highly likely to have truncated any earlier remains, if present. The HER also records a foot and mouth pit within the site (HER15495); this too will have removed all archaeological deposits within its footprint.
- 4.15 It is the conclusion of this assessment that the site as originally assessed by the Council i.e. the entirety of Site A (HFD012) will have no greater effect on any non-designated assets than the currently identified draft allocation PS43. Additional features relating to the former airfield on the site may be encountered but this will not restrict its development.
- 4.16 Should a planning application come forward for the site, it is recommended that an assessment of the archaeological potential of the site is undertaken to accompany the

planning application, so that any potential for impacts from the proposed development can be identified in addition to any mitigation requirements.



## **Section 5**

### **Summary of Key Findings**

- 5.1 Tritax Symmetry appointed The Environmental Dimension Partnership Ltd (EDP) to undertake landscape, ecology and heritage studies in relation to land west of Gloucester Road referred to as Symmetry Park Gloucester West ('the site'), which is partly included in the draft allocation for employment in the Draft Stroud Local Plan as PS43.
- 5.2 This document considers the merits of the draft allocation land but also the merits of the entirety of the southern field parcel which was included, together with the draft allocation area as site HFD012 (Site A), within the Stroud District Council Strategic Assessment of Land Availability (SALA) New Sites Update Report, November 2019.

#### **Landscape**

- 5.3 In landscape and visual terms, there are no 'in principle' constraints to development either of the draft allocation area or the whole of the site. Whilst landscape enhancements can be achieved on the draft allocation area, there will be greater opportunity to incorporate more meaningful structural landscaping and green infrastructure if the full site area were to be included in the allocation. With the design of a robust and sensitive masterplan, EDP's conclusion is that the site is eminently suitable for an employment allocation in landscape terms and offers the additional opportunity to deliver landscape character improvements in the vicinity of Javelin Park.

#### **Ecology**

- 5.4 From an ecological perspective, due to the spatial separation of the site from the habitat designations identified in the area of search, these designations do not pose an 'in principle' constraint to development of the draft allocation area, nor of the site as a whole.
- 5.5 EDP also considers that there are no 'in principle' (significant) ecological constraints posed by the habitats present on-site. These habitats are low in their intrinsic value and are unlikely to support either unique or exceptional species populations/assemblages.
- 5.6 Given the low intrinsic value of the habitats present, the site gives an opportunity to deliver a net biodiversity gain, ensuring planning policy compliance. Whilst biodiversity gains can be achieved on the draft allocation area, there will be greater opportunity to incorporate more meaningful biodiversity gains if the full site area were to be included in the allocation.

#### **Heritage**

- 5.7 The site contains no designated heritage assets where there would be a presumption in favour of their physical preservation.

- 5.8 Both the draft allocation and the site as a whole have the potential to form part of the setting of a number of designated assets. EDP's initial assessment suggests, that whilst this may be the case, it is not considered that development within either the draft allocation or the wider site would cause a change within the setting of these assets such that their significance would be negatively affected.
- 5.9 It is the conclusion of this assessment that the wider allocation as originally assessed by the Council, i.e. the entirety of HFD012 will have no greater effect on any heritage assets than the currently identified draft allocation PS43.
- 5.10 Based on this preliminary assessment of the archaeological potential of the site, it is considered that the site is highly unlikely to contain features of anything other than local significance, should these survive and the site as originally assessed by the Council will have no greater effect on any non-designated assets than the currently identified draft allocation PS43. Additional features relating to the former airfield on the site may be encountered but this will not restrict its development.

## Appendix EDP 1 Photoviewpoints



**Photoviewpoint EDP A1.1:** Javelin Park and Dobbies Garden Centre screen the site from the B4008 at Junction 12 of the M5.



**Photoviewpoint EDP A1.2:** View from within the northern field parcel, looking east towards Dobbies Garden Centre which lies adjacent to the north-eastern boundary.



**Photoviewpoint EDP A1.3:** View from with the northern 'paddock' of the site, looking south across the site and towards Javelin Park. The site's western boundary (far right of the view) is defined by fencing, low scrub vegetation and occasional trees. The open nature of the western boundary permits views of the adjacent M5 and passing traffic.



**Photoviewpoint EDP A1.4:** View from B4008 looking north-west across an open agricultural field and towards the site's southern boundary.



**Photoviewpoint EDP A1.5:** View from within the southern field, looking east towards the Cotswold Hills. The foreground view comprises the southern façade of Javelin Park and associated construction site situated behind construction fencing. The B4008 is well-treed filtering views of the agricultural fields beyond.



**Photoviewpoint EDP A1.6:** View from within the southern field, looking south. The southern boundary is defined by a low and frequently 'gappy' hedgerow and few un-established trees.



**Photoviewpoint EDP A1.7:** Intervening field boundary vegetation filters views into the site from public footpath (Ref. Haresfield FP 3) to the west of the Grade II\* Church of St Peter and Haresfield Village.



**Photoviewpoint EDP A1.8:** View from Standish Lane bridge over the M5 motorway looking north towards the site. The upper part of Javelin Park development can be seen with mature vegetation screening the ground level, serving to integrate the building into the landscape.



**Photoviewpoint EDP A1.9:** View from Haresfield Beacon on the Cotswolds Way on elevated ground to the south-east.



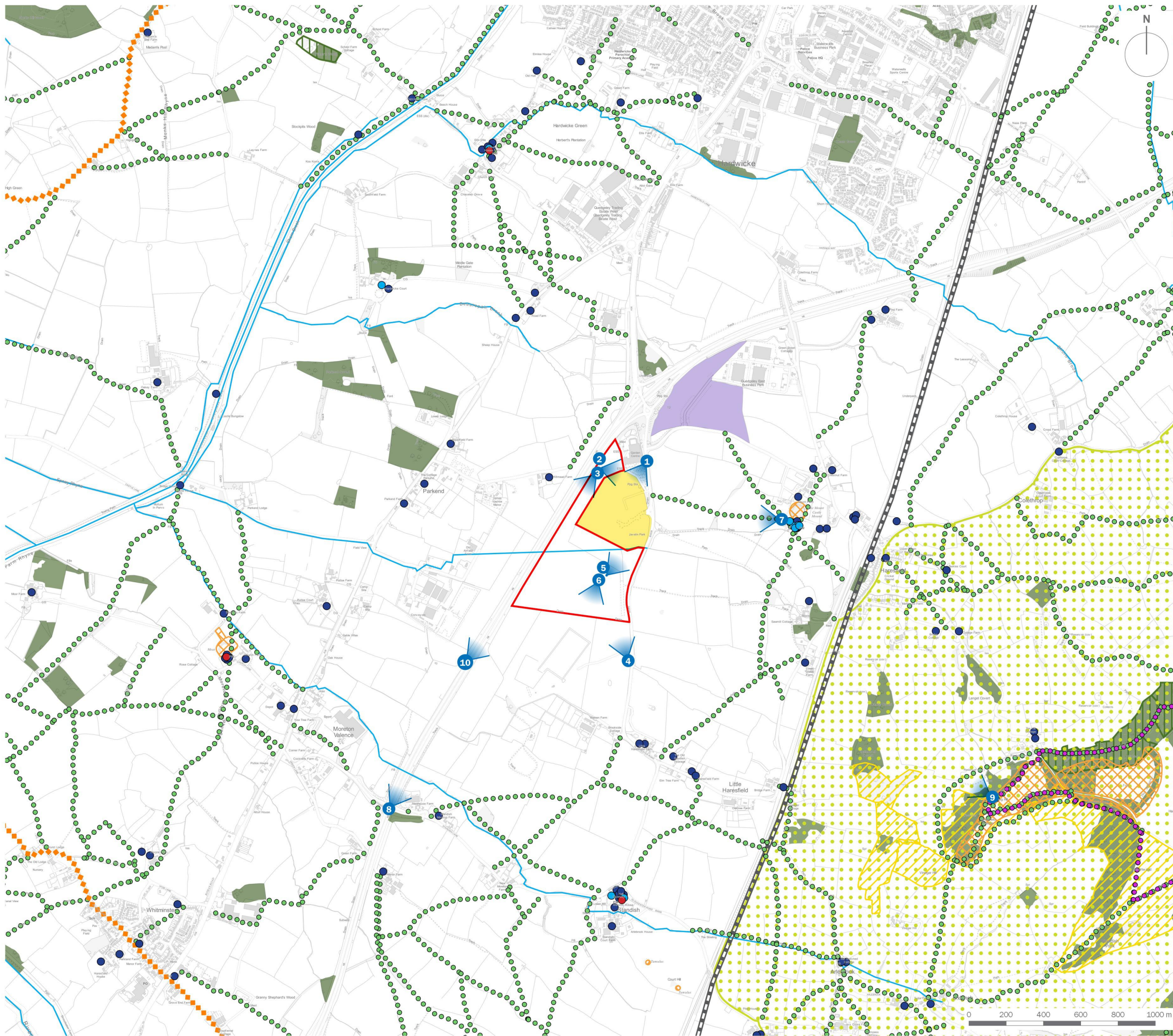
**Photoviewpoint EDP A1.10:** View from the M5 motorway taken from Google Street View to illustrate the views experienced by receptors travelling north on the M5.  
**Google Street View Screenshot (Image Capture 2018)**



## **Plans**

- Plan EDP 1**      Environmental Planning Context  
(edp5060\_d002b 22 January 2020 GY/VP)
- Plan EDP 2**      Landscape Character Context  
(edp5060\_d004b 22 January 2020 GY/VP)
- Plan EDP 3**      Extended Phase 1 Habitat Survey  
(edp5060\_d006a 22 January 2020 ZH/ME)

*This page has been left blank intentionally*



- Proposal Site A
- Javelin Park Waste to Energy Plant and Gloucester 12
- Site Allocation SA4a - St Modwen Park Gloucester

- Landscape Considerations**
- Cotswolds Area of Outstanding Natural Beauty (AONB)
  - National Forest Inventory
  - Water Course
  - Railway
  - 10 Photoviewpoint Locations

- Ecology Considerations**
- Ancient Woodland

- Heritage Considerations**
- Grade I Listed Building
  - Grade II\* Listed Building
  - Grade II Listed Building
  - Scheduled Monument

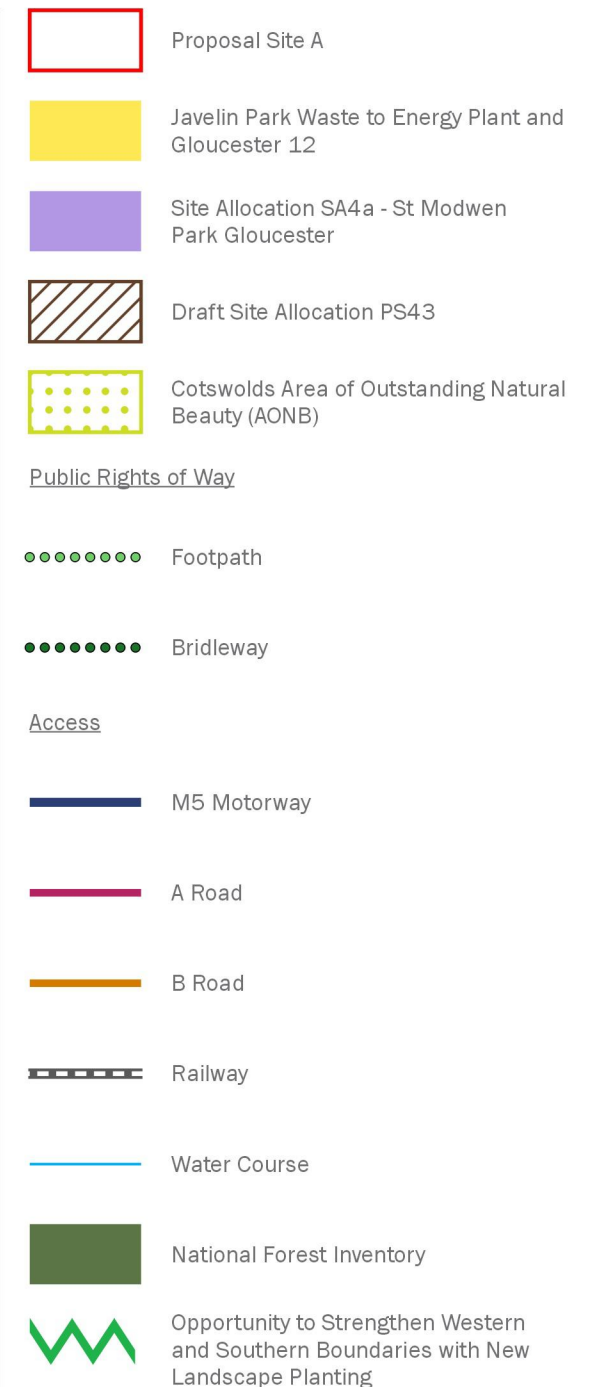
- Other Relevant Considerations**
- Public Rights of Way
  - National Trail: Cotswold Way
  - National Cycle Route
  - Open Access Land

client  
**Tritax Symmetry**  
 project title  
**Symmetry Park Gloucester West**  
 drawing title  
**Plan EDP 1: Environmental Planning Context**

date	<b>22 JANUARY 2020</b>	drawn by	
drawing number	<b>edp5060_d002b</b>	checked	
scale	<b>1:20,000 @ A3</b>	QA	



Registered office: 01285 740427 - www.edp-uk.co.uk - info@edp-uk.co.uk



client	Tritax Symmetry	
project title	Symmetry Park Gloucester 1	
drawing title	Plan EDP 2: Landscape Character Context	
date	22 JANUARY 2020	drawn by
drawing number	edp5060_d004b	checked
scale	1:10,000 @ A3	QA



Registered office: 01285 740427 - www.edp-uk.co.uk - info@edp-uk.co.uk



- Proposal Site A
- Scattered Trees (Broad-leaved)
- Tall Ruderal
- Scrub and Tall Ruderal
- Broad-leaved Plantation Woodland
- Dense Continuous Scrub
- Scattered Scrub
- SI Poor Semi-improved Grassland
- A Arable
- Hardstanding

client  
**Tritax Symmetry**

project title  
**Symmetry Park Gloucester 1**

drawing title  
**Plan EDP 3: Extended Phase 1 Habitat Survey**

date	<b>16 JANUARY 2020</b>	drawn by	
drawing number	<b>edp5060_d006a</b>	checked	
scale	<b>1:4,000 @ A3</b>	QA	



Registered office: 01285 740427 - [www.edp-uk.co.uk](http://www.edp-uk.co.uk) - [info@edp-uk.co.uk](mailto:info@edp-uk.co.uk)

**CARDIFF**  
**02921 671900**

**CHELTENHAM**  
**01242 903110**

**CIRENCESTER**  
**01285 740427**

**SHREWSBURY**  
**01939 211190**

**info@edp-uk.co.uk**  
**www.edp-uk.co.uk**

The Environmental Dimension Partnership Ltd. Registered as a Limited Company in England and Wales. Company No. 09102431. Registered Office: Tithe Barn, Barnsley Park Estate, Barnsley, Cirencester, Gloucestershire GL7 5EG



**Landscape  
Institute**  
Registered practice

**IEMA** Transforming the world  
to sustainability

**URBAN  
DESIGN  
GROUP** REGISTERED  
PRACTICE