



**Symmetry Park
Gloucester East**

**Environmental
Appraisal**

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

On behalf of:
Tritax Symmetry

January 2020
Report Reference
edp5060_r002a

Contents

Section 1	Introduction	1
Section 2	Landscape and Visual Matters	3
Section 3	Ecology and Nature Conservation Matters	13
Section 4	Archaeological and Heritage Matters	19
Section 5	Summary of Key Findings	23

Appendices

Appendix EDP 1 Photoviewpoints

Plans

Plan EDP 1 Environmental Planning Context
 (edp5060_d003a 21 January 2020 GY/VP)

Plan EDP 2 Landscape Character Context
 (edp5060_d005a 21 January 2020 GY/VP)

Plan EDP 3 Extended Phase 1 Habitat Survey
 (edp5060_d007a 21 January 2020 ZH/ME)

This version is intended for electronic viewing only

	Report Ref: edp5060_r002			
	Author	Formatted	Peer Review	Proofed by/Date
002_DRAFT				-
002a				

Section 1

Introduction

- 1.1 Tritax Symmetry has appointed The Environmental Dimension Partnership Ltd (EDP) to undertake landscape, ecology and heritage studies in relation to land east of Gloucester Road, referred to as Symmetry Park Gloucester East ('the site').
- 1.2 This document considers the merits of the land which was included as HFD011 (Site B), within 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 Cirencester, Shrewsbury, Cardiff and Cheltenham. Details of the practice can be obtained at our website (www.edp-uk.co.uk).
- 1.4 This document provides an overview of EDP's desk- and field-based appraisals in relation to landscape and visual matters (**Section 2**), ecology and nature conservation matters (**Section 3**), archaeology and heritage matters (**Section 4**).

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 proposals in the context of current local planning policy and planning guidance.

Planning Policy

NPPF 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 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 it 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 2020, in accordance with sector guidance¹. 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 and opportunities to proposed allocation of the site.

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 900m 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 three fields to the east of the B4008, Javelin Park and Dobbies Garden Centre and to the south of Site Allocation SA4a – St Modwen Park Gloucester, which are all 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 three irregular shaped arable fields. The site is physically contained by the B4008 to the west and Stonehouse Lane to the north. At the site's south-western corner is an adjacent dwelling with vehicular access across a cattle grid and along a track which runs adjacent to the site's southern boundary. The site is located to the west of the village of Haresfield; approximately 330m from the 'The Mount' moated site and designated scheduled monument and Grade II* Church of St Peter;

¹ 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).

- The site is overlooked to the north by the Site Allocation St Modwen Park Gloucester development, which comprises business, industrial and storage and distribution units (**Photoviewpoint EDP A1.1**) accessed off Stonehouse Lane; and
- The Site Allocation SA4a – Dobbies Garden Centre, Javelin Park energy from waste plant and the M5 corridor itself between junction 12 and the railway corridor to the east, all represent the urban nature of this landscape baseline (refer to **Plan EDP 2**).

Cultural Heritage and Historic Landscape

- The site is likely to have been farmland for a long time. Though the remnants of an historic field boundary can be perceived through a study of aerial photography and historic maps, intensive agricultural management and hedgerow removal has lessened the historic character such that the site now comprises larger-scale fields with fewer hedgerow trees; and
- A cultural connection exists on the site in the form of the public footpath (Ref. Haresfield FP 3) which extends through the site connecting the Church of St Peter in Haresfield Village on an east-west axis to the B4008. A second public right of way (PRoW) lies adjacent to the site's eastern boundary, extending from the Church of St Peter on a north-west, south-east axis to Stonehouse Lane.

Topography

- Topographically the site is a largely flat area, varying by no more than 15m in elevation, and sits at a level consistent with the adjacent roads and settlement in all surrounding directions. The highest point is around c.30m aOD located towards the north-east corner of the site, along from which the land continues to rise to the east towards the Cotswolds escarpment; 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. This minimises the need for cut and fill or retaining structures and allows for good masterplanning. Whilst the open and low-lying nature of the site is representative of the local landscape character, it can be found elsewhere to the south.

Landscape Fabric

- At the time of the site visit (07 January 2020) **Photoviewpoint EDP A1.1** shows that the three field parcels are currently used for arable crop. The site's western boundary is defined by a low, clipped native hedgerow with some occasional small trees to the north-west;
- The site's northern boundary consists of a low native hedgerow with occasional hedgerow trees. There are two breaks in the boundary permitting access into the fields in addition to the PRoW connection. Internally, there are mature trees scattered within the hedgerows of the site; and

- The site's southern boundary is defined by a row of horse chestnut trees running alongside an access track, with some new planting to fill the gaps. Continuing along the southern boundary are mature trees scattered within the hedgerows of the site. An impression of views towards the site's southern boundary is illustrated at **Photoviewpoint EDP A1.3**, taken from the B4008.

2.11 At National level, the site is located within National Character Area (NCA) 106: 'Severn and Avon Vales' whilst NCA 107: 'Cotswolds' lies approximately 2km 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 LCA's include LCA 5a: Escarpment Foothills to the east, and 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 several urbanising factors that serve to lessen the inherent sensitivity of the site to further development; namely the adjacent energy from waste plant, Dobbies Garden Centre and car park and the local road infrastructure of the M5 Motorway and B4008. These features do not overtly 'urbanise' the wider locale but do notably influence the character of the site itself and differentiate it from the more intact rural landscapes in the wider area.
- 2.18 The assessment acknowledges new development at key settlements has already degraded some areas of the landscape, but retaining pasture land and preventing the loss of hedgerow trees and small woodlands is noted as particularly important for the escarpment footslope fringes.
- 2.19 The most sensitive aspects of the site – namely the sparse vegetated boundaries – would need to 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 1**:
- In terms of visual context, the site is situated approximately 900m 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 A1.10**). 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 A1.10**) 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;
 - The site's western boundary is defined by a low, clipped hedgerow permitting close-proximity, open views out across the site from the B4008 (adjacent to Dobbies Garden Centre) and towards the settlement edge of Haresfield. (**Photoviewpoint EDP A1.1**). Views of the site are experienced in the context of surrounding industrial/commercial development;
 - To the east, views of the site can be experienced by PRoW users on footpaths (such as Ref. Haresfield FP 3 and 5) which extend from Haresfield Village. The site is viewed within the context of arable fields and urban form (e.g. Javelin Park, Dobbies Garden Centre and St Modwen Park Gloucester) illustrated by **Photoviewpoints EDP A1.5** and **A1.7**. To the right of **Photoviewpoint EDP A1.5**, significant planting belts have been recently located between the site and village of Haresfield, thus filtering the site and lessening the localised views in to or out of the village;

- The site is visible from the B4008, but views are heavily filtered from the south of the route owing to the low-lying ground in combination with intervening field boundary vegetation in fields to the south of the site (**Photoviewpoints EDP A1.3** and **A1.4**). Upon reaching the Javelin Park development and roundabout junction there are views across the site contained by native hedgerow. Owing to the low-lying topography and intervening field boundary vegetation, only a glimpse of the St Modwen Park Gloucester development can be seen at this point, looking north through a gap in the roadside hedgerow (**Photoviewpoint EDP A1.2**);
- To the north, the site is well contained by existing St Modwen Park Gloucester development and M5 and mature vegetation, which combine with the relatively flat local topography to screen intervisibility with areas to the north. Glimpsed views through gaps in the hedgerow may be experienced by receptors travelling south along Haresfield Lane, however there is limited intervisibility;
- From the south, filtered to open views are available from the B4008, which ultimately passes adjacent to the western boundary of the site. Mature vegetation and built form at Little Haresfield screen views towards the site further south. Further south-east, views towards the site would be possible from elevated ground where gaps in vegetation allow at Haresfield Beacon on the Cotswold Way (**Photoviewpoint EDP A1.10**); 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 settlement, mean that the site will not be openly visible over the wider geographic area.

Setting of the Cotswolds AONB

- 2.21 The site lies within approximately 900m 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 industrial/commercial development, and the M5 with associated lighting and noise impacts, effects of development of the site on views towards the escarpment would be localised, and availability of views from the AONB very limited. This was reflected in the findings of the appeal on the nearby Javelin Park Site (Paragraph 32 of Appeal Reference: APP/T1600/A/13/2200210). The Secretary of State agreed with the Inspector that the Javelin Park site was part of an urban fringe that had been present within, and advancing into the Vale of Berkeley landscape for 40 years, and was planned to continue in the future.

Strategic Assessment of Land Availability (SALA) 2019 and Draft Site Allocation PS32

- 2.22 The council's assessment for site HFD011, within the Stroud District Council SALA updated 2019, Appendix 4, rejects the site on the basis of:

*“...the likely **high landscape impact, narrowing the countryside gap and historic landscape setting to the Haresfield listed buildings and monument.** The site’s sensitivity relates to the sense of Haresfield’s place in the landscape, its character and the dominance of the church – visually and historically. There are therefore significant landscape and heritage impacts preventing sustainable development in this location.”*

2.23 This conclusion is at odds with the Draft Site Allocation PS32, presented in the *Stroud District Council Draft Local Plan*, which identifies Site PS32 as suitable for development, notwithstanding the southern field parcel being located in closer proximity to Haresfield Village and associated designated heritage assets. Site PS32 is allocated for 5ha employment and strategic landscaping buffer to the south-east (as illustrated on **Plan EDP 2**).

2.24 In assessing the potential impacts of Site PS32 (Ref. HFD009), the council’s 2017 SALA states that:

*“This area was outside the Landscape Sensitivity Assessment of our settlements. It is recognised that the site adjoins a current employment site. Nevertheless, **significant landscape buffers would be required to reduce impact on Haresfield and the gap function** between Hunts Grove and Haresfield Village taking account of the existing landscape character.”*

2.25 The 2017 SALA concludes that:

*“Although not currently policy compliant, **the site has no overriding physical constraints with further work on landscape and highway, cumulative effects and flood risk assessment** preventing development for employment uses in the future should the Local Plan strategy identify the need for growth in this location. It could be linked to a current key employment site and Local Plan allocation SA4a.”*

2.26 In this regard, given the close proximity of Site PS32 to Haresfield Village, the council’s 2017 SALA is both unsupported by any landscape and visual evidence base and inconsistent when compared with the assessment of impact for the site (HFD011 Site B in the SALA), which retains a larger spatial gap from the settlement edge of Haresfield Village and designated heritage assets within.

2.27 It is recommended that a detailed Landscape and Visual Appraisal should be undertaken to fully understand all potential views into and out of the site, but also to understand what spatial gap is required to protect the integrity of Haresfield Village and existing landscape character.

Constraints and Opportunities

2.28 There are some notable constraints in landscape terms, the principal consideration being the spatial gap and interface with Haresfield Village and historic landmarks; Church of St Peter and ‘The Mount’ scheduled monument. The retention of the legibility of that core is a

key consideration but not one that presents an 'in principle' constraint to allocation in landscape and visual terms.

2.29 EDP considers that the site is of medium sensitivity and while it currently represents a rural agricultural character, it is contradicted by the presence of the St Modwen Park Gloucester development, Javelin Park, the M5, the elevated junction 12 and Dobbies Garden Centre and associated parking.

2.30 Whilst the character of the site and adjacent villages have features typical of the Lowland Plain LCA 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:

- Retention of better-quality hedgerows and hedgerow trees within areas of open space or alongside the existing public footpath to maintain a mature structure and coherent landscape fabric;
- Opportunity to develop the green infrastructure of the site, reinforcing hedgerow boundaries, connecting and creating habitats with tree and woodland planting, meadow grassland planting and creation of areas of amenity space;
- Give careful consideration to the location of buildings and building heights across the site to ensure development does not break skyline views of the escarpment and is complementary with the existing character;
- Careful consideration should be given with regard to colour and materials of 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 existing skyline, minimising visual effects particularly when viewed from elevated locations;
- Tree planting within the site to continue the characteristic 'treed character' identified to the east. This would take the form of tree belts in open spaces and a strong framework of street trees, particularly on the B4008 frontage; and
- Integration of sustainable drainage systems (SuDS) into the design, including swales and balancing areas to increase biodiversity opportunities.

This page has been left blank intentionally

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

NPPF 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 (NPPF 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 Council 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 guidance². 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 is to identify any potentially significant ('in principle') ecological constraints and opportunities to development proposed within the site.
- 3.6 Based upon established geographical value systems³, 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.

² 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).

³ 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: Designations

3.8 International designations include Ramsars, Special Areas of Conservation (SACs) and Special Protection Areas (SPAs). The data search revealed 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 there are five such designations within 5km of the site. Further information regarding the designations within the site's potential zone of influence (Zol) are provided in **Table EDP 3.1**.

3.9 The site is 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 (Zol)

Designation Name	Distance and Direction from the Site	Main Interest and Features
Severn Estuary Ramsar SAC and SPA	6.8km 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	6.7km 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	6.5km east	The site is designated for being the most westerly block of Asperulo-Fagetum beech forest in the UK.
Rodborough Common SAC	7.4km 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</i> - <i>Brachypodium pinnatum</i> grassland, which is more or less confined to the Cotswolds.
Cotswold Commons and Beechwoods NNR	4.1km east	These areas are designated for their beech forests and limestone grasslands.
Edge Common SSSI	4.6km east	One of a series of unimproved Jurassic limestone grassland sites representing this formerly widespread habitat of the Cotswolds.

Designation Name	Distance and Direction from the Site	Main Interest and Features
Haresfield Beacon SSSI	2.1km south-east	Designated for its geological interests.
Range Farm SSSI	4.7km north-east	Range Farm Fields is of special interest for its large area of flower-rich, unimproved neutral grassland. This is a habitat that is nationally scarce, having been much reduced by changes in land use and management.
Robin's Wood Hill Quarry SSSI	4.9km north-east	Designated for its geological interests.

- 3.10 There is one non-statutory designation of County-level value or less (or other designations that should be considered at this level), within 1km of the site. Haresfield to Brookthorpe Local Wildlife Site (LWS) is located 900m east of the site. Haresfield to Brookthorpe is designated for its road verges which contain notable flora.
- 3.11 Great Russel's Ground is an unconfirmed site that is located 320m north-west of the site on the opposing side of the M5 motorway. Great Russel's Ground is notable for its unimproved grassland, tall ruderal, marsh and ponds.
- 3.12 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

- 3.13 The site comprises three large arable fields. The fields are bounded by species poor hedgerows and ditches. The ditches were wet at the time of survey. To the east of the site is a small block of deciduous woodland. Within the south-western corner of the site is another small woodland block along with a residential property and garden. The southern boundary of the site consists of a line of mature horse chestnut trees with new planting to fill the gaps. There are mature trees scattered within the hedgerows of the site. A pond is located 100m north-west of the site but there are no other ponds within 250m of the Site. The habitats are displayed on **Plan EDP 3**.
- 3.14 The aforementioned habitats on-site 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 arable land that constitutes the majority of the site 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.
- 3.15 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; these are likely to be of only Local-level value or less.

- 3.16 The scope of further Phase 2 survey work for protected/Priority Species populations/assemblages, required to support any future planning application, will be subject to consultation in due course 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 will 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 designations and the nature of the proposals, it is not considered that any of the designations are an 'in principle' constraint to the allocation or development of the site. The site can achieve planning policy compliance because 'significant harm to biodiversity' can be avoided.
- 3.18 EDP considers that there are no 'in principle' (significant) ecological constraints posed by the habitats present on-site, which are low in their intrinsic value and unlikely to support unique or exceptional species populations/assemblages.
- 3.19 As with any proposed development, and subject to confirmation through consultation with the LPA Ecologist, a focused suite of Phase 2 surveys and an ecological assessment would be required to support any planning application coming forward for the site, and to inform the design of a robust masterplan.
- 3.20 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 which are suitable for wildlife, including areas of wildflower;
 - Appropriate design of sustainable drainage scheme (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.

3.21 With the design of a robust and sensitive masterplan, EDP's conclusion is that the site is eminently suitable to development. Moreover, it 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 The section sets out the context of the site with regard to the designated and non-designated heritage assets within, adjacent to and within 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 online resources including the National Heritage List, curated by Historic England, and online historic mapping websites.
- 4.3 The purpose of this assessment is to identify any 'in principle' constraints that may affect the potential allocation and delivery of the site for employment development.

Designated Heritage Assets

- 4.4 Designated heritage assets in the vicinity are illustrated on **Plan EDP 1**. The site contains no designated heritage assets where there would be a presumption in favour of their physical preservation. The closest designated heritage assets are located c.280m to the east and comprise a number of highly graded designated heritage assets within the settlement of Haresfield, which include 'The Mount' moated site, a nationally important scheduled monument, and the Grade II* Church of St Peter, which within its grounds has numerous monuments listed at both Grade II* and Grade II. There are additional Grade II listed buildings within the settlement of Haresfield, including the Thatched Cottage which is located c.350m from the site's eastern boundary. There are also several designated heritage assets in the wider landscape.
- 4.5 The site has the potential to form part of the setting of these designated assets. However, an initial assessment of the site, informed by a site visit, indicates that the site will only form part of the setting of those assets located in close proximity to it, and to a lesser degree those in the wider landscape. Depending on the nature and scale of the development, harm could arise to the significance of designated heritage assets, particularly those that are closest to the site. However, in terms of the NPPF this harm could not be considered to be substantial, as there will be no physical harm to any designated heritage asset as a result of the development of the site.
- 4.6 The site is referred to as site HFD011 within the 2019 SALA, Appendix 4 (Stroud District Council 2019). The site was rejected on the basis of a Heritage Impact Appraisal undertaken by Stroud District Council in 2019 to inform the 2019 SALA update.
- 4.7 The Heritage Impact Appraisal concluded that for HFD011 (the site) there were "*Significant heritage constraints (medium/high sensitivity)*" categorised as a score of 3 out of 4, with 4 being the highest level of sensitivity, with the potential impacts weighted at F (the highest category) defined as "*The impact on [xxx feature(s) of heritage interest] could prohibit development on this site*" (emphasis as per original quote).

- 4.8 In its summary, the Heritage Impact Assessment identifies that the site has significant heritage constraints but also acknowledges that it is “*quite distant from the nearest heritage asset*”. The assessment goes on to identify that it is the function that the site plays in enabling “*key long views of the ancient manorial core of Haresfield*” that are of heritage value, but what these are specifically, or why they contribute to heritage significance of those assets within Haresfield, or more widely, is not identified, although the contribution to the wider landscape is acknowledged.
- 4.9 It is stated that “*there is no obvious scope for development that would have any positive heritage benefit*”. However, the NPPF does not require a specific heritage benefit, just that a balanced judgement is made where harm to heritage assets is identified and as such, there would be no reason to discount this site on that basis.
- 4.10 As such, it would appear that the site has been excluded from the SALA process on the basis of a basic high-level assessment of the potential for harm and that a more detailed study, in line with national guidance issued by Historic England, may produce a different result identifying that this site may well have been excluded from the site selection process prematurely. Notwithstanding this critical point, the classification of the site as ‘3F’ indicates that its heritage sensitivity could, rather than should, prohibit development on this site, suggesting that in certain circumstances development could be possible.
- 4.11 It should be noted here that the Stroud District Council SALA undertaken in 2017 includes an area to the north of the site identified as HFD009. Neither the 2017 Heritage Impact Assessment that was undertaken to support the SALA, or the subsequent updates in 2018 and 2019, assess the potential for heritage impact as a result of the development of this site, despite it being immediately adjacent to a Grade II listed building (Thatched Cottage) and within c.170m of the nationally significant ‘The Mount’ scheduled monument.
- 4.12 In fact, the SALA identifies 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.”*
- 4.13 This assessment seems to be both incorrect, given the proximity of nationally important heritage assets, and inconsistent, when compared with assessment of impact for site HFD011, which is the subject of this report and is approximately twice as distant from the same heritage assets.
- 4.14 It is recommended that a detailed Heritage Setting Assessment is undertaken in line with national guidance to fully understand if, and to what extent, there will be an effect on the significance of heritage assets within the wider Zol of the site, from its development.
- 4.15 It was observed on the site visit that significant planting belts have been recently located between the site and the village of Haresfield, presumably as a result of the planning consent for Javelin Park. As such, as part of that planning permission any localised views in to, or out of the village, will over time be lost.

Non-designated Heritage Assets

- 4.16 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 period within the site. Roman pottery was recovered during the installation of a water pipeline across the site in the late 1970s, which may indicate the presence of archaeological activity of the date. 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.
- 4.17 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.
- 4.18 It is recommended that an assessment of the archaeological potential of the site is undertaken to identify any potential for impacts from the proposed development on the buried archaeological resource, should the site be subject to a future planning application.

This page has been left blank intentionally

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 east of Gloucester Road (the site). This document considers the merits of the site which was included for review as HFD011 within the 2019 Stroud District Council *Strategic Assessment of Land Availability* (SALA), Appendix 4.

Landscape

- 5.2 In landscape and visual terms there are no 'in principle' constraints to development of the site. It is considered that landscape enhancements can be achieved on the site as part of any development, with the opportunity to strengthen and enhance hedgerows, plant trees and generally improve the green infrastructure of the site in accordance with landscape character aspirations. With the design of a robust and sensitive masterplan, EDP's conclusion is that the site is suitable for an employment allocation in landscape terms.

Ecology

- 5.3 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 allocation or development of the site.
- 5.4 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.
- 5.5 Given the low intrinsic value of the habitats present, the site presents an opportunity to deliver a net biodiversity gain, ensuring planning policy compliance.

Heritage

- 5.6 The site contains no designated heritage assets where there would be a presumption in favour of their physical preservation.
- 5.7 The site has the potential to form part of the setting of designated heritage assets within the site's wider Zol. However, an initial assessment of the site, informed by a site visit, indicates that the site will form part of the setting of those assets located in close proximity to it, and to a lesser degree those in the wider landscape. Depending on the nature and scale of the development, harm could arise to the significance of designated heritage assets, particularly those that are closest to the site. However, in terms of the NPPF this

harm could not be considered to be substantial as there will be no physical harm to any designated heritage asset as a result of the development of the site.

- 5.8 The proposed extension to St Modwens Park Gloucester has been provisionally allocated, despite being closer to heritage assets of National importance in Harefield. Given this inconsistency it is recommended that a detailed heritage setting assessment is undertaken, in line with national guidance, to fully understand if, and to what extent, there will be an effect on the significance of heritage assets within the wider Zol of the proposed Gloucester East site, that forms the subject of this report, from its development.
- 5.9 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.

Appendix EDP 1 Photoviewpoints



Photoviewpoint EDP A1.1: View from the B4008 looking directly east across the site. The new employment site can be seen (left of the view) blending into the landscape. There are open views towards the limestone escarpment.



Photoviewpoint EDP A1.2: View from the B4008 at the roundabout junction with Javelin Park, looking north-west; a glimpsed view of the new employment development can be seen; however, it is effectively integrated into the landscape through its design utilising a grey colour palette and low height.



Photoviewpoint EDP A1.3: The view from the B4008 looking north illustrates how the site is filtered by layers of intervening field boundary and roadside vegetation, particularly so in views north-east.



Photoviewpoint EDP A1.4: View from the B4008 through a gap in the field boundary vegetation, looking across the open, flat agricultural fields. The interior of the site is filtered by layers of intervening vegetation which effectively filter the new employment development (left of the view).



Photoviewpoint EDP A1.5: View taken from public footpath (Ref. Haresfield FP 3) looking directly west towards the site in the foreground. The Malvern Hill form the backdrop to the view, with Javelin Park a prominent building in the landscape and the Dobbies Garden Centre filtered by intervening vegetation.



Photoviewpoint EDP A1.6: View from public footpath (Ref. Haresfield FP 3) within the graveyard of the Church of St Peter, surrounded by mature trees on its perimeter affording open to slightly filtered views across the intervening agricultural fields and towards the site.



Photoviewpoint EDP A1.7: View from public footpath (Ref. Haresfield FP 26)



Photoviewpoint EDP A1.8: Mature trees filter and screen views of the site beyond from public footpath (Ref. Haresfield FP 5) to the south of Haresfield Village.



Photoviewpoint EDP A1.9: View from Haresfield Lane through an open field gate across the Draft Site Allocation PS32 in close proximity to the Haresfield Village and with views of the Church of St Peter.

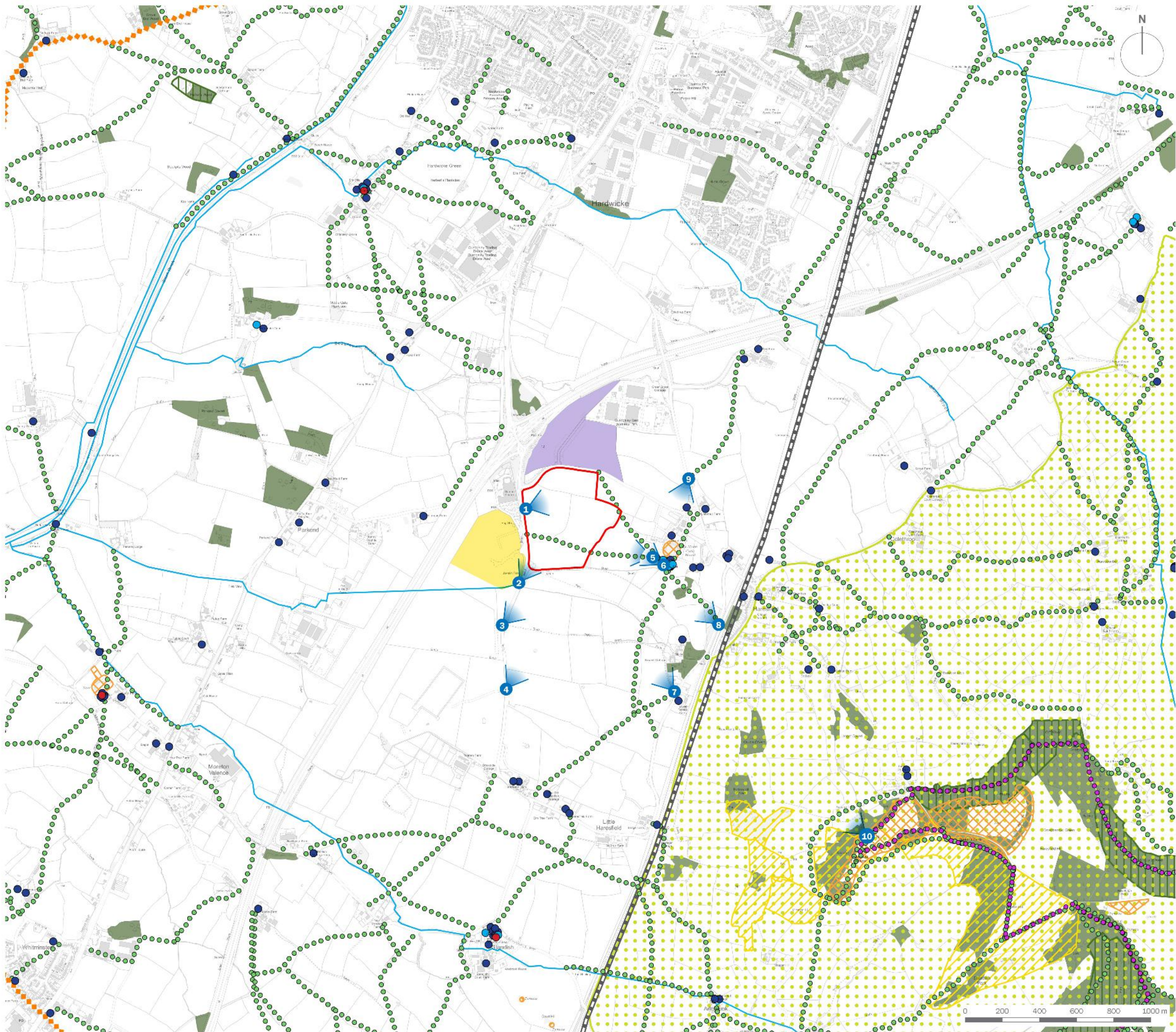


Photoviewpoint EDP A1.10: View from Haresfield Beacon on the Cotswolds Way on elevated ground to the south-east.

Plans

- Plan EDP 1** Environmental Planning Context
(edp5060_d003a 21 January 2020 GY/VP)
- Plan EDP 2** Landscape Character Context
(edp5060_d005a 21 January 2020 GY/VP)
- Plan EDP 3** Extended Phase 1 Habitat Survey
(edp5060_d007a 21 January 2020 ZH/ME)

This page has been left blank intentionally



- Proposal Site B
 - 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
 - 9 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

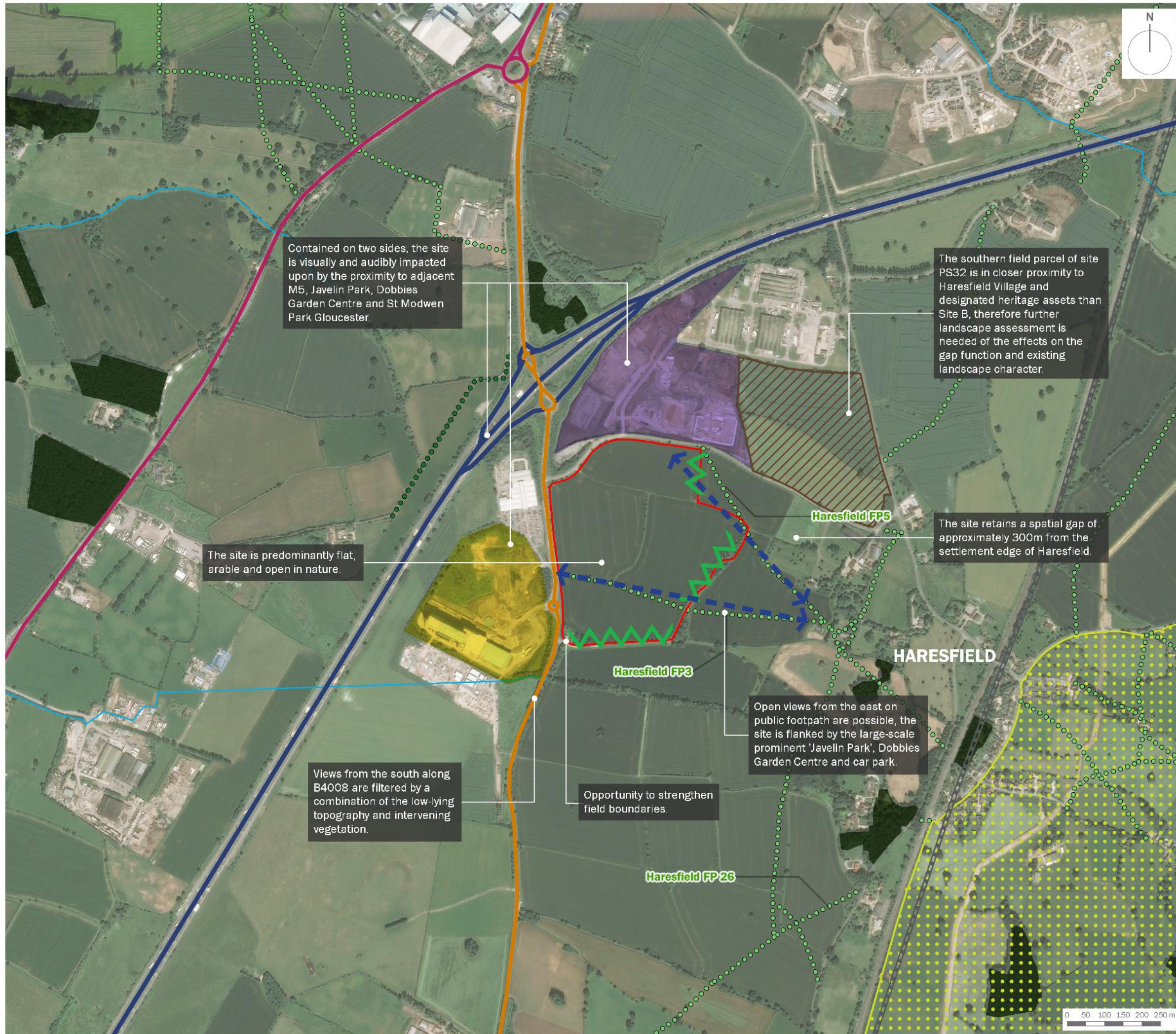
project title
Symmetry Park Gloucester East

drawing title
Plan EDP 1: Environmental Planning Context

date	21 JANUARY 2020	drawn by	GY
drawing number	edp5060_d003a	checked	VP
scale	1:20,000 @ A3	QA	CR



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



Contained on two sides, the site is visually and audibly impacted upon by the proximity to adjacent M5, Javelin Park, Dobbies Garden Centre and St Modwen Park Gloucester.

The southern field parcel of site PS32 is in closer proximity to Haresfield Village and designated heritage assets than Site B, therefore further landscape assessment is needed of the effects on the gap function and existing landscape character.

The site is predominantly flat, arable and open in nature.

The site retains a spatial gap of approximately 300m from the settlement edge of Haresfield.

Open views from the east on public footpath are possible, the site is flanked by the large-scale prominent 'Javelin Park', Dobbies Garden Centre and car park.

Views from the south along B4008 are filtered by a combination of the low-lying topography and intervening vegetation.

Opportunity to strengthen field boundaries.

- Proposal Site B
- Javelin Park Waste to Energy Plant and Gloucester 12
- Site Allocation SA4a - St Modwen Park Gloucester
- Draft Site Allocation PS32
- Cotswolds Area of Outstanding Natural Beauty (AONB)

- Public Rights of Way
- Footpath
 - Bridleway
- Access
- M5 Motorway
 - A Road
 - B Road
 - Railway
 - Water Course
 - National Forest Inventory
 - Retain and Strengthen Mature Native Vegetation
 - Retain Corridor Views to the Church of St Peter

client
Tritax Symmetry

project title
Symmetry Park Gloucester East

drawing title
Plan EDP 2: Landscape Character Context

date	21 JANUARY 2020	drawn by	GY
drawing number	edp5060_d005a	checked	VP
scale	1:10,000 @ A3	QA	CR



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



- Proposal Site B
- Scattered Trees (Broad-leaved)
- Scattered Trees/Parkland (Broad-leaved)
- Intact Species-poor Hedgerow
- | | | | Intact Species-poor Hedgerow and Trees
- Wet Ditch
- Broadleaved Semi-natural Woodland
- A Arable

client
Tritax Symmetry

project title
Symmetry Park Gloucester East

drawing title
Plan EDP 3: Extended Phase 1 Habitat Survey

date	21 JANUARY 2020	drawn by	ZH
drawing number	edp5060_d007a	checked	ME
scale	1:2,500 @ A3	QA	CR



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