## Land West of Pucklechurch

# **Environmental Briefing Paper**

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Dimension
Partnership Ltd (EDP)

On behalf of

Davison Family and

IM Land Ltd, a

subsidiary of IM

Properties plc

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(EDP3485/04 08 December 2016 WG/FM)

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# Section 1 Introduction

#### Introduction

- 1.1 This briefing paper has been prepared on behalf of the Davison Family and IM Land Ltd, a subsidiary of IM Properties plc by the Environmental Dimension Partnership Ltd (EDP), to provide an overview of the landscape and visual aspects of Land to the West of Pucklechurch ('the site'). Consideration is also given to Ecological and Heritage matters.
- 1.2 The purpose of EDP's work is to advance the current understanding of the landscape and visual considerations and provide evidence of the suitability of the site for sustainable development in this regard.
- 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 company operates throughout the UK from offices in Cirencester, Cardiff and Shrewsbury. Details can be obtained at www.edp-uk.co.uk.
- 1.4 This preliminary landscape and visual appraisal has been informed by a desk study and a brief site walkover, undertaken during December 2016. The information derived is discussed below.

#### The Site

- 1.5 The site boundary as defined on **Plan EDP 1** identifies the area of land that is currently within IM Properties plc control.
- 1.6 The site lies at the western edge of Pucklechurch and to the east of Bristol within South Gloucestershire District. The site contains a mixture of land uses, including agricultural land divided by tree belts and hedgerows, an underground reservoir, numerous farm buildings, residential dwellings (including those along Parkfield Rank and other urban fringe land uses including a landfill site and fields in equestrian use.
- 1.7 The site is enveloped by transport routes of varying grades and tree cover. The B4465 and the settlement edge of Pucklechurch form the site's eastern boundary, the B4465, Shortwood delineates the southern boundary of the site and the Bristol and Bath Railway Path defines the edge of the site to the west. The northern boundary is formed by the M4 motorway.
- 1.8 The character of the site is influenced by both settlement, transport routes (minor and major road) and the urban fringe land uses within the site itself.

#### **Planning Background**

1.9 The site was considered in the South Gloucestershire 'Strategic Green Belt Assessment' (December 2011) as part of Area 17. The document assesses each area against the five NPPF purposes and concluded in relation to Area 17 that:

"The ridgeline currently performs an important purpose in preventing urban sprawl and functions as the rural backdrop to the urban area, particularly as the Emersons Green East development area will abut it. The green belt area to the east of the ridgeline preserves Pucklechurch as a separate settlement, open views from the Cotswold Area of Outstanding Natural Beauty and prevents urban sprawl. Both of these areas are a considerable distance from significant employment or services in the existing urban area and if green belt was lost would result in urban sprawl and the loss of open countryside which provides a setting from Bristol and the Cotswold Area of Outstanding Natural Beauty."

1.10 The site was also considered in the West of England Joint Spatial Plan - Green Belt Assessment (November 2015) as Cell 26. The document assesses each cell against the five NPPF purposes and concluded in relation to Cell 26 that:

"The Green Belt in this cell directly serves purposes 1, 3 and 5;

Checks the sprawl of the urban area; and

Safeguards agricultural land and woodland from encroachment"

1.11 The site was promoted previously by Colliers as a potential strategic growth option at the issues and options consultation stage of the West of England Joint Spatial Plan. Representations at that time included a brief consideration of Green Belt Purposes in relation to the site as follows:

"Land to the West of Pucklechurch is constrained by the natural topography that drops steeply towards Lyde Green and forms a natural green and open boundary to the unrestricted sprawl of North East Bristol and allocation of Lyde Green;

The Bristol and Bath Cycle Path also provides an elevated barrier to Lyde Green and allows for a degree of separation to be legible.

The Green Belt Assessment identifies that the Land to the West of Pucklechurch also does not contribute to the purpose of preventing towns from merging into one another;

All areas of Green Belt are considered to assist in safeguarding the countryside from encroachment, however the land to the West of Pucklechurch is not unrestricted countryside, as the topography provides a natural barrier to development and the landscape therefore lends itself to protection towards the most westerly fringe of the site; ...".

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#### 1.12 It concludes that:

- "...the performance of the land to the west of Pucklechurch in respect of releasing it from the Green Belt, the site is the least worse case scenario as it performs the least amount of reasons for keeping land within the green belt."
- 1.13 The purpose of this assessment, undertaken by a Chartered Landscape Architect is to advance the current understanding of the performance in landscape and visual terms of the site against the five purposes of the Green Belt and provide a commentary on the suitability of the site for sustainable development in this regard.

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# Section 2 Landscape Related Designations and Policy

- 2.1 Landscape related designations are shown on **Plan EDP 1**.
  - The site falls within the Bristol Green Belt;
  - The boundary of the Cotswold Area of Outstanding Natural Beauty (AONB) lies approximately 3km to the east of the site;
  - The site does not lie within or directly adjacent to a registered park and garden. However, Dyrham Park Registered Park and Garden (RPG) falls some 4km to the east of the site;
  - Parts of the eastern and southern boundaries are adjacent to conservation areas, which contains a number of listed buildings;
  - The site contains two grade II\* listed buildings (Dennisworth Farmhouse and associated Barn);
  - There is a small area of ancient woodland within the site, as well as number of nondesignated ecological sites: Sites of Nature Conservation Interest (SNCI) and Regionally Important Geological Sites (RIGS);
  - There are no Tree Preservation Orders on or adjacent to the site; and
  - There is public right of access onto the site via Public Right of Way (PRoW) routes. However, none of the site is Open Access Land.

#### **National Designations**

2.2 The site lies within the Bristol Green Belt, where the Green Belt boundary meets the eastern settlement edge of Bristol. Pucklechurch itself is not 'washed over' by the Green Belt and the settlement currently falls outside the designation.

#### Green Belt

2.3 The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence. As such, Green Belt is a planning policy designation rather than a landscape designation based on landscape character and value.

- 2.4 The National Planning Policy Framework (NPPF) paragraph 80 sets out five purposes of the Green Belt, which are listed below:
  - "To check the unrestricted sprawl of large built-up areas;
  - To prevent neighbouring towns merging into one another;
  - To assist in safeguarding the countryside from encroachment;
  - To preserve the setting and special character of historic towns; and
  - To assist in urban regeneration, by encouraging the recycling of derelict and other urban land."
- 2.5 The NPPF sets out guidelines for local planning authorities in relation to Green Belts including: the desire to plan positively to enhance their beneficial use, looking for opportunities to provide access, outdoor sport, and recreation; and to retain and enhance landscapes, visual amenity, and biodiversity; or to improve damaged and derelict land.
- 2.6 Guidance in paragraphs 84 and 85 makes clear that, when reviewing Green Belt boundaries, local planning authorities (LPAs) should take account of the need to promote sustainable patterns of development; they should consider the consequences for sustainable development of channelling development towards urban areas, towns, and villages within the Green Belt or towards locations outside the Green Belt boundary. This will be considered further in the Planning Statement accompanying the consultation response.
- 2.7 Also of relevance to this report is guidance in paragraph 85 with regard to defining boundaries, which states that local authorities should *inter alia*:
  - Not include land that it is unnecessary to keep permanently open; and
  - Define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.
- 2.8 The site has not been included in the Joint Spatial Strategy with a number of reasons cited, namely transportation issues, access to major areas of employment, topographical, ecological and archaeological constraints, impression of potential sprawl and separation in the locality undermining the objectives of the Green Belt.
- 2.9 This report addresses the ecological, archaeological/heritage matters in relation to the site and also explores the site in landscape and visual terms, particularly in relation to the purposes of the Green Belt.

#### **Cotswolds Area of Outstanding Natural Beauty**

2.10 The site does not lie within or directly adjacent to the Cotswold AONB. However, it does lie within approximately 3km of the AONB's western boundary and the setting of the AONB is a consideration. However, it is noted that there are several tree belts and woodlands separating the site from the AONB boundary as does the settlement of Pucklechurch to the east and the M4 to the north.

#### Registered Park and Garden

2.11 Dyrham Park Registered Park and Garden (RPG) falls some 4km to the east of the site but is not visible from it. This RPG is separated from the site by a number of roads and intervening tree belts, fields and boundaries associated with these features. These features, are found to substantially limit, or detract from, the possibility of intervisibility between Dyrham RPG and the site.

#### Heritage and Archaeology

2.12 The site contains the Grade II\* Dennisworth Farmhouse and its associated Grade II listed barn and the Brandy Bottom Colliery scheduled monument. The Pucklechurch and Siston Conservation Areas are located to the east and south of the site. In terms of non-designated heritage assets (below-ground archaeology), there is a good potential of encountering Roman archaeology within the site, although this may only comprise 'low' interest items, such as field boundaries. In addition, there is a possible Bronze Age burial mound along the southern edge of the site.

#### **Ecology**

2.13 There are no statutory designations within the site. Some habitats on the site's peripheries (adjacent to the M4 and within the Pucklechurch Ridge) are subject to non-statutory SNCI designations. The site will likely contain a range of protected species for which surveys will be required, although it is anticipated that activity will be focused within the Pucklechurch Ridge. Within the western portion of the site habitat and biodiversity interest is largely vested within woodland blocks and the linked network of hedgerows and hedgerow trees, throughout most of the western portions of the site, 20<sup>th</sup> century agricultural intensification has likely reduced biodiversity. There is small area of semi-ancient natural woodland in the site's southwest corner.

#### **Local Policy**

2.14 Local landscape policy of relevance to the site is contained within South Gloucestershire Core Strategy (CS) 2006-2027, adopted 11 November 2013, as well as a number of saved policies from the South Gloucestershire Local Plan (SGLP) 2006. Policies relevant to this site are noted below.

#### These include:

- **Policy CS1 High Quality Design** Development will need to demonstrate that sitting, form, scale, and height is informed by the site and its wider context and that existing landscape, nature conservation, amenity and PRoW are safeguarded and enhanced through development;
- **Policy CS5 Location of Development**: This manages the location and scale of development. The policy states that in open countryside new development is to be limited and that the extent of the Green Belt will remain relatively unchanged to that shown in the South Gloucestershire Local Plan. It states that any development in the Green Belt should be small scale infill within existing settlement boundaries and that other proposals should comply with provisions within the NPPF and relevant saved local plan policies within the Core Strategy;
- Policy CS9 Managing the Environment and Heritage: This identifies that the
  natural and historic environment is finite and irreplaceable, new developments should
  therefore: conserve, respect and enhance heritage assets; conserve and enhance the
  natural environment, by avoiding or minimising impacts on biodiversity and
  geodiversity; and conserve and enhance the character, distinctiveness, quality and
  amenity of the landscape;
- **Saved SGLP Policy L1:** This states that "In order that the character, distinctiveness, quality and amenity of the landscapes of South Gloucestershire are conserved and enhanced, new development will be permitted only where:
  - (a) Those attributes of the landscape which make a significant contribution to the character of the landscape are conserved and where possible enhanced;
  - (b) Those features in or of the landscape which make a significant contribution to the character or distinctiveness of the locality are retained, protected and managed in a manner which ensures their long-term viability; and
  - (c) The amenity of the landscape is conserved and where possible enhanced."
- **Saved SGLP Policy GB1**: This aims to protect the Green Belt through limitations on the: a) construction of new buildings; and b) the change of use of land or existing buildings. The proposals include the replacement of one building and the extension of two buildings so that it is assumed that section b) is relevant. This section states that within the Green Belt permission will only be given for the change of use of land or existing buildings where:
  - "1. It would not have a materially greater impact than the present authorised use on the openness of the Green Belt and would not conflict with the purpose of including land in it;

- 2. the buildings are of permanent and substantial construction and are capable of conversion without major or complete reconstruction; and
- 3. the form, bulk and general design of the buildings are in-keeping with their surroundings.

Any proposals for development within or conspicuous from the Green Belt which would have an adverse impact on the visual amenity of the Green Belt will not be permitted."

- 2.15 Policy GB1, therefore, sets a number of tests for development or redevelopment within the Green Belt, which are of some relevance in landscape terms. These tests include:
  - The impact of the proposal on the 'openness' of the Green Belt;
  - The acceptability of the form, bulk and general design of the buildings in relation to their surroundings; and
  - That any proposals for development within the Green Belt should not have an adverse effect on its visual amenity.
- 2.16 The site also lies within the 'Forest of Avon' Community Forest within which it is an objective to achieve a range of woodland and open space uses;
- 2.17 There are no other material statutory or non-statutory constraints that would preclude development of the site.
- 2.18 However, local planning policy also contains general policy of relevance to the site, which seeks to ensure that proposals:
  - Safeguard and enhance amenity and PRoW;
  - Conserve, respect and enhance heritage assets;
  - Conserve and enhance the natural environment;
  - Conserve and enhance the character, distinctiveness, quality and amenity of the landscape;
  - Conserve and, where possible, enhance those attributes of the landscape which make a significant contribution to its character; and
  - Retain, protect and manage, in a manner which ensures their long-term viability, those features in or of the landscape which make a significant contribution to its character or distinctiveness.

#### **Policy Discussion**

- 2.19 As described above, the whole of the site lies within the designated Green Belt. This is a long-standing and well-established development control tool which is embodied within the saved SGLP at Policy GB1.
- 2.20 As noted in the Spatial Strategy Consultation Document:

"a sizeable proportion (48%) of the West of England is part of the Bristol-Bath Green Belt. This has significant implications for the spatial strategy, particularly reflecting the strategic priority to retain the overall function of the Green Belt. The advice in NPPF para 83 is 'Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. At that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period."

2.21 The Consultation document is clear that it is not possible to sustainably accommodate all the identified West of England growth needs entirely outside the Green Belt and thus some development will need to take place within the Bristol and Bath Green Belt. This report therefore assesses the site against the five purposes of the green belt from a landscape and visual perspective, to give some guidance as to the potential appropriateness of the site as a Green Belt Release Option. This assessment is summarised in **Section 4**.

# Section 3 Landscape Character and Visual Considerations

#### **National Character**

- 3.1 The site falls within Natural England's National Character Area (NCA) No 118 'Bristol, Avon Valleys and Ridges. The key characteristics of this NCA, of relevance to the site, are:
  - "Livestock rearing with arable on flatter land;
  - Motorways, commercial and residential areas occupy a significant area...;
  - A varied landform of low lying shallow vales that contrast sharply with high open downland ridges, and reflects the underlying varied geology including coal measures...".

#### South Gloucestershire Landscape Character Assessment

- 3.2 There are twenty-one separate landscape types (LT) within South Gloucestershire Unitary Authority, made up of individual landscape description units with a similar pattern of geology, topography, land use and settlements. The site falls across two character areas, with the larger eastern portions falling within the 'Pucklechurch Ridge & Boyd Valley' landscape area, and the western ridge comprising 'Westerleigh Vale & Olland Ridge' (relevant extracts contained as **Appendix EDP 2**).
- 3.3 The 'Pucklechurch Ridge & Boyd Valley' is described as "a diverse undulating rural landscape of mainly mixed farmland." The key characteristics of this area relevant to the site are:
  - "Large scale, generally undulating plateau and vale landscape, with Pucklechurch Ridge forming a scarp/ridge to the north and west and the enclosed River Boyd valley to the south with gently rolling hills;
  - The Pucklechurch Ridge has a distinctive landform and textured cover, forming a prominent backdrop and skyline to adjacent westerly character areas;
  - Land cover of medium sized pasture and arable fields, with some areas of large and small fields associated with plateau and steeper ground respectively;
  - Infrequent small broadleaved woodlands including ancient woodland or copses in the north and elsewhere, associated with the Pucklechurch Ridge and valley landform. These provide habitat for notable species including European Protected Species;

- Field boundaries are predominantly clipped hedges, with limited hedgerow trees and some post and wire fences;
- Settlement is concentrated at Pucklechurch and Wick with several small historic villages/hamlets dispersed throughout the area;
- Active and disused quarries lie within the area, with claypits and coal industry relics along the toe of the Pucklechurch Ridge;
- The M4 motorway forms a significant feature cutting across the area. Numerous narrow lanes also cross the area."

#### Physical Influences

- 3.1 The following physical influences within the landscape of the 'Pucklechurch Ridge & Boyd Valley' relevant to the site include:
  - "The Pucklechurch Ridge is a pronounced, medium scale landform rising from the Westerleigh Vale eastwards. The ridge has a prominent scarp edge which varies little in height along its length, at approximately 100 metres AOD., whilst its toe varies from between 80 metres a.o.d. in the north to 65 metres AOD. in the south. The northern scarp is thus more prominent. Throughout its length the landform is folded with occasional, small scale valley incisions fed by springs and tributaries of the Folly Brook, flowing generally north westwards;
  - The scarp peters out to the south of Shortwood Hill, forming gently rising ground and a curving ridgeline, which defines the Siston Brook valley; and
  - The plateau landscape to the east of the ridge rises barely perceptibly southwards, but is slightly more prominent in the area of Pucklechurch itself, forming a broad dome at around 130 metres AOD...".

#### Forces for Change

- 3.2 The following forces for change within the landscape of the 'Pucklechurch Ridge & Boyd Valley' are relevant to the site include:
  - "The landscape framework is largely intact, although there are signs of erosion of its integrity, following the removal of features or deterioration through limited management. Hedgerows are in places sporadic and intermittent, replaced by stock fencing, and there is subdivision of fields with alien boundary treatments resulting from horsekeep affecting a wide area. Hedgerow removal has been associated with arable land use, particularly in elevated flat areas and as a result of quarrying, landfill...;

- Other uses such as caravan storage, a traveller site to the west of Pucklechurch and the introduction of manmade landforms and ornamental planting associated with golf courses are further eroding the traditional rural character of this landscape area...;
- The Pucklechurch Ridge visually influences the adjacent Westerleigh Vale and Kingswood character areas lying to the west. It has areas susceptible to landscape change, with the rough grassland and scrub possibly subject to future changes in grazing practices, which would affect the visual texture and openness of the scarp;
- The Parkfield Rank facade of properties, along the ridgeline of the scarp, forms an unusual, distinctive and isolated built skyline feature. This intrudes upon the scarp face of the Pucklechurch Ridge;
- The abattoir and oil terminal buildings near the scarp toe in the adjoining character area, and M4 motorway, are built forms which dilute the rural character, due to their massing, scale or linearity, which contrasts with the rural landscape and landform of the scarp. The Emerson's Green East development site, covers an extensive area within the adjacent character area to the west and extends between the existing urban edge of Emerson's Green, to and along the toe of the Pucklechurch Ridge. Development of this scale will inevitably result in significant landscape change and loss of the existing rural character, which will be prominent from the Pucklechurch Ridge;
- ...Heavy traffic and overhead powerlines are local detractors to landscape character...;
- The central and eastern parts of this landscape character area are sensitive to change, which might erode its distinctive character, due to its open nature and visibility from the Cotswold Scarp; and
- The undulating topography and semi-enclosed nature of the western and southern parts of this landscape character area, coupled with a denser vegetation structure, makes it relatively less sensitive to change. However there is more sensitivity on the open hill tops and skyline locations, which are prominent within local and long views."
- 3.4 The 'Westerleigh Vale & Olland Ridge' is described as "a diverse and intricate mix of farmland, settlement, roads, commons and industrial heritage." The key characteristics of this area relevant to the western most portion of the site are:
  - "A gentle to rolling landscape, contained by the prominent Pucklechurch and Oldland Ridge to the east and influenced by the dominant and continuous urban edge of Bristol to the west;

- The relatively limited arable farmland provides ground nesting opportunities while the winter stubble provides foraging potential for farmland birds including Amber and Red listed species;
- Historic remains of coal industries are evident to the north and east of the area with disused tramways, railways, chimneys, scattered worker settlements, excavations and spoil mounds;
- Contained to the west by the residential urban edge, with large scale commercial/ industrial sheds in the north by M4;
- Major residential development between the M4 and the Ring Road is under construction and will become a prominent element in views from the Pucklechurch Ridge."

#### Forces for Change

- 3.5 The following forces for change within the landscape of the 'Pucklechurch Ridge & Boyd Valley' relevant to the site include:
  - "The Westerleigh Vale and Oldland Ridge landscape is influenced, both directly and indirectly, by the close proximity of Bristol to the west and the frequent points of access between the urban and rural areas, provided by the extensive road network. While significant change is taking place in a number of locations, particularly in the centre and north of the area, this character area retains pockets of distinctive rural landscape and areas in variable condition and sensitivity to change;
  - Emerson's Green East development site covers an extensive area, extending to and along the toe of the Pucklechurch Ridge, contained to the north by the M4; and
  - Increasing traffic on the adjacent roads has introduced significant visual and noise disturbance to Siston, Webb's Heath and Bridgeyate Commons. The new Avon Ring Road has relieved vehicle pressure on the minor roads and lanes adjacent to the commons, enhancing their potential for recreational use, linking to the new network of footpaths and cycleways associated with the new road."

#### **EDP Site Character and Visual Assessment**

3.6 The character of the site and its immediate surroundings is generally consistent with published assessments, outlined above, particularly in relation to the Pucklechurch Ridge, the reduced sensitivity of the land on the plateau to the east of the Pucklechurch Ridge and to the west of Pucklechurch and the numerous urbanising influences that impinge on the landscape.

- 3.7 The sites environmental constraints and opportunities have been identified by EDP following a site visit and data trawl and are presented on **Plan EDP 2.** The findings are broadly consistent with the above published character assessments and the further discussion below.
- The site can be separated into two distinct areas based on landscape character (**Plan EDP 3**) with the larger eastern portion forming a relatively flat plateau and the western portion forming the steeply sloping Pucklechurch Ridge. The site's high point in the south east (by the underground reservoir) is approximately 122m above Ordnance Datum (aOD) from where it slopes gently to the northern boundary with the M4 for around 1400m to 99m aOD (a gradient of less than 1:20). The eastern portion of the site is topographically comparable with that of Pucklechurch to the east. From the high point adjacent to the reservoir there is a marked slope over 300m to the site's southern boundary with the B4465, after which the land continues to slope gently southwards. Fields in the eastern portion of the site are generally large and rectilinear bounded by post and wire fences, and managed hedgerows with scattered hedgerow trees. Scattered farm buildings and tracks can be found across the site, as are small woodland blocks.
- 3.9 Although the predominant land use is agriculture, the site also includes an underground reservoir, numerous farm buildings, residential dwellings (including those along Parkfield Rank) and other urban fringe land uses including a landfill. At the site's interface with settlement, a number of field parcels are also in intensive equestrian use. The western portion of the site includes the remnants of extensive historical industrial activity as well as an operational landfill.
- 3.10 While the site may be regarded as 'open countryside' for planning purposes, its current land use and visual character is such that it does not form part of the more functionally intact agricultural landscape to the north, east (beyond Pucklechurch) and south. In addition, the M4 motorway to the north, Pucklechurch Village to the east and the B4465 to the south act to separate the site from the wider agricultural landscape and exert a significant urbanising influence on the sites character.
- 3.11 Large parts of the site are enclosed and inward looking, though visual enclosure is less prevalent in the site's southern portion, where further reaching views are available across a gently rolling plateau landscape. The Cotswold scarp defines the horizon from the southern portion of the site when looking to the southeast, hills to the south of Bristol form a distinct horizon when looking to the southwest. From these locations, the settlement edge of Pucklechurch, HM Young Offenders Institution and the busy B4665 are discernible detractors within the landscape. From the north-eastern portion of the site the Cotswold AONB scarp as well as parts of junction 18 of the M4 are visible over a gently rolling agricultural landscape. From much of the western portion of the site the Pucklechurch Ridge provides a definitive green wedge between the site, Pucklechurch and Bristol.
- 3.12 Were the entirety of the site to be developed, visual change would likely be extensive. However, if development were to respect the site's landscape (particularly topographical)

sensitivities, it is predicted that such change would be geographically limited. From the Cotswold scarp to the east, much of the site is screened by Pucklechurch. The Pucklechurch ridge that forms the western portion of the site and the City of Bristol beyond. Restricting development to the western portion of the site would also prevent visual encroachment to the west. There is the potential for views of the site from lanes and tracks to the north and south of the site where vegetation allows. Such views take in the context of Pucklechurch and the M4 motorway, and will be restricted due to vegetation and topography. Assuming development does not encroach onto the Pucklechurch Ridge development, it would remain relatively contained from urban areas in the eastern fringes of Bristol to the west. Development would be visible from the rights of way network in and around the ridge. Open views are afforded from residential receptors within the site (Parkfield Rank) and those within the settlement edge of Pucklechurch. Any views of site from the wider landscape would be perceived against the backdrop of existing development and infrastructure, which contribute to the sites semi urbanised character.

- 3.13 It should be noted that it is not necessary to hide new development in this landscape context; built development (including housing and significant infrastructure) is already an established and frequent component of the visual character of the area, so new development will not be inappropriate, unexpected or discordant as part of the views.
- 3.14 In summary, in visual terms, the site is relatively contained by Pucklechurch to the east, and by the Pucklechurch Ridge to the west. Longer distance views are available looking across transport routes to south and north and toward the Cotswold scarp from the north eastern areas of the site. Overall, there is limited cohesion across the site and between the site and the surrounding landscape due to the range of land uses and its containment by transportation routes.

# Section 4 Green Belt Assessment

4.1 This Green Belt Assessment has been undertaken by a Chartered Landscape Architect and follows the assessment criteria and methodology outlined below.

#### **Assessment Criteria**

4.2 As noted in the NPPF, paragraph 80 and **Section 2** above, the Green Belt serves five purposes. For each NPPF purpose, criteria have been determined that allows for a more comprehensive analysis to be undertaken, in landscape and visual terms, of the contribution the site makes to the function of the Green Belt in this location. The criteria for each purpose are described in more detail below.

#### Purpose 1: To Check the Unrestricted Sprawl of Large Built-up Areas

- 4.3 This is a test that considers whether any built form is contained within the site or if the site is able to prohibit further development. Commonly this is ribbon development, but may also be piecemeal development in isolated areas or along settlement edges. A site may have already have been compromised by some form of development, in which case it is relevant to consider the extent to which that development has eroded the sense of openness this being whether or not there is a sense that the site within the Green Belt is still open and absent of development.
- 4.4 Sprawl may also be discouraged by defensible boundaries that are either natural (e.g. topography, woodland, water course) or man-made features such as a road, railway line, or settlement edge. These may be within the site or share a boundary with it. Sites that do not contain defensible boundaries contribute towards greater openness.

#### Purpose 2: To Prevent Neighbouring Towns Merging into One Another

- 4.5 The wording of the NPPF refers to 'towns', but in the context of this assessment study area, the Green Belt affects a considerably smaller geographical scale, in which it is more relevant to consider the potential for merging of neighbouring settlement edges as well as distinct settlement areas which might be defined as towns. In essence, the purpose seeks to avoid coalescence of built form. This can be perceived in either plan view or 'on the ground' by intervening natural or man-made features.
- 4.6 The interpretation of 'merging', in terms of geographic distances, differs according to the study area. Whilst a review of distinct towns might need to account for distances over several kilometres, when considering gaps between smaller settlements, the range can be much smaller with distances reducing to as little as 100m in some cases. It is of note that susceptibility to 'merging' depends on the extent of openness between two settlements

and each situation needs to be reviewed in relation to the local landscape and visual context.

#### Purpose 3: To Assist in Safeguarding the Countryside from Encroachment

- 4.7 In terms of Green Belt, the 'countryside' is the landscape outside of the current development limits, and which is generally defined by key characteristics such as hedgerow networks, varying field patterns, presence/absence of woodland, downland character, topographical features or open space, etc. Countryside is likely to be undeveloped land that is typically rural and often managed for agriculture or forestry, or simply kept as an open natural or semi-natural landscape. It may, however, contain manmade features such as historic landmarks or isolated properties, or even larger areas of settlement.
- 4.8 This assessment is based on the key landscape characteristics of the site and its surroundings as well as the visual context as described above in **Section 3**.
- 4.9 Sites that are highly representative of the key landscape characteristics, and exhibit them in good condition, make a stronger contribution towards safeguarding the countryside than land that is less representative of the landscape character area or contains features that are in poorer condition. This allows a relative and qualitative 'value' element to be applied to landscapes.
- 4.10 The matter of 'encroachment' is also a judgement that considers whether or not built form (such as residential development and/or related urbanising features such as street lighting, road signs, road infrastructure, etc.) is found in the site or affects it and also the degree to which it has preserved the key characteristics or severed them from the wider countryside. A site which has limited or no urbanising influences has a stronger role in safeguarding countryside.
- 4.11 Finally, encroachment can also be prohibited by the presence or absence of particular natural or man-made features that separate existing settlement edges from the wider countryside. Typically, it is large man-made features such as dual carriageways, or motorways; natural features might include woodland, large water bodies such as lakes and rivers or deep, steeply sloped valleys. Such features may border a site or be contained wholly or partially within it.
- 4.12 However, natural features in particular, including woodland, rivers or ridgelines, may suffer a loss of their integrity as prominent features within the landscape if development is progressed upon, or near, them. These features should therefore be safeguarded.

#### Purpose 4: To Preserve the Setting and Special Character of Historic Towns

4.13 The subject of setting and special character in the context of historic towns should be examined on a site by site basis, by specialist heritage consultants. However, the

conservation area local heritage designation allows the assessment to acknowledge that historic cores exist.

## Purpose 5: to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

4.14 The consultation exercise considers sites within the Green Belt as well as the redevelopment of urban land with the presumption in favour of development opportunities outside the Green Belt.

#### Methodology

- 4.15 EDP have developed a methodology for Green Belt Assessment, which is based on landscape and visual assessment methodology with regard to the purposes of the Green Belt and our experience of Green Belt reviews.
- 4.16 The site is scored against the criteria listed for each purpose as shown in **Appendix EDP 1**, with criteria scoring set out in **Table EDP 4.1** below.

Table EDP 4.1: Scoring

Criteria Score	Contribution to the Green Belt Purpose
1	No contribution
2	Limited contribution
3	Strong contribution

- 4.17 The grading of overall scores reflect the contribution the site makes towards meeting the purposes of the Green Belt. This ensures that, whilst the NPPF does not require all five purposes, or tests, to be met simultaneously, the extent to which a site contributes to the criterion of a specific purpose will better inform the decision for it to be removed from the Green Belt, or retained within it.
- 4.18 The findings are presented in the Green Belt Assessment Table in **Appendix EDP 2**.
- 4.19 This assessment does not include consideration of the potential of the site to address all NPPF paragraphs relating to the Green Belt. This is, however, provided as part of the planning statement supporting the information submitted to the LPA.
- 4.20 The findings demonstrate that, out of a maximum score of 21, which would indicate that a site would be performing a strong role in achieving all Green Belt purposes, and a minimum score of 7), the site scores 12, which can be described as making a limited contribution.
- 4.21 A summary discussion of the findings in relation to each of the first four purposes is provided below.

#### Purpose 1: To Check the Unrestricted Sprawl of Large Built-up Areas

- 4.22 This assessment considers how the site and its features contribute towards the openness of the Green Belt and the potential to create a permanent boundary, should it be taken out of the designation. The site comprises a variety of land uses including built form, housing, urban fringe land uses, an underground reservoir and arable farmland with woodland, and hedgerows. The sense of openness is, therefore, already limited to some extent. Further development of the site would contribute towards increasing the built form and therefore reduce the sense of openness experienced in views across the site where available. However, that sense of openness has already been eroded.
- 4.23 The area is delineated by clearly definable boundaries that follow existing strategic roads to the north and south, the built edge of Pucklechurch to the east and the Bristol and Bath Railway Path to the west. Should development be delivered in the manner indicated above and as shown on **Plans EDP 2** and **3**, a defensible boundary would be created within the western portion of the site and defined by the Pucklechurch Ridge, which would provide definitive separation between Pucklechurch and Bristol. This would be further enhanced should the potential link road between the M4 and the A414 come forward as part of the proposal.

#### Purpose 2: To Prevent Neighbouring Towns Merging into One Another

- 4.24 Pucklechurch is a settlement in its own right and as such the proposals will seek to act as an extension to the settlement. Although on plan, development of the site would bring the settlement of Pucklechurch closer to Bristol, should the Pucklechurch Ridge be kept development free and retained as a green wedge within the Green Belt, a clear separation would be retained. This green ridge would provide functional as well as visual separation between the settlements.
- 4.25 It is therefore considered that, should the western portion of the site (Pucklechurch Ridge) be retained within the green belt, development of the eastern portion of the site will not contribute to 'unrestricted sprawl' or 'the merging of neighbouring towns'.

#### Purpose 3: To Assist in Safeguarding the Countryside from Encroachment

- 4.26 The site is abutted by existing development to the east and contained on all remaining sides by transport corridors. Should the Pucklechurch Ridge be retained as development free, the western portion of the site would provide land to the west of Pucklechurch that is physically separated from the wider open countryside to the north, east and south and could be developed as an extension to the settlement in a sustainable manner.
- 4.27 Furthermore, in landscape character terms, the site currently has a strong urban fringe character with a fragmented mosaic of built, urban fringe, and agricultural land uses; and urban influences from adjacent settlement and transport routes. Thus the site does not have a strong sense of countryside in which to encroach. As noted above, the lack of

connectivity with the wider open countryside, limits the potential for any further encroachment.

#### Purpose 4: To Preserve the Setting and Special Character of Historic Towns

4.28 The site is so far removed from the historic centres of any towns or cities in the area that it can have no function in relation to this purpose.

## Purpose 5: To Assist in Urban Regeneration, by encouraging the Recycling of Derelict and Other Urban Land

- 4.29 The site is entirely contained within the Green Belt and does therefore perform positively against this function. However, as demonstrated above, with the identified need for some development within the Green Belt, some development can occur in this location, while the Pucklechurch ridge continues to perform the essential functions of the Green Belt, preventing merging of settlements, encroachment and unrestricted sprawl.
- 4.30 It is considered that the site could reasonably be removed from the Green Belt and developed in accordance with the principles in the Proposed Land Use Masterplan without harm to the integrity of the Green Belt overall.

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# Section 5 Conclusions

- 5.1 This briefing paper has provided an overview of the landscape and visual aspects of the site, which lies within the Green Belt, and provided landscape evidence of the suitability of the site for sustainable development in this regard. In doing so, it has also explored matters relating to archaeology, heritage and ecology; the conclusions in respect of these matters is summarised below.
- 5.2 The site contains the Grade II\* Dennisworth Farmhouse and its associated Grade II listed barn and the Brandy Bottom Colliery scheduled monument within the Pucklechurch Ridge. The Pucklechurch and Siston Conservation Areas are located to the east and south of the site. These receptors will need careful consideration in the masterplan process to ensure a sensitive approach. In terms of non-designated heritage assets (below ground archaeology) there is a good potential of encountering Roman archaeology within the site, although this may only comprise 'low' interest items, such as field boundaries. In addition, there is a possible Bronze Age burial mound along the southern edge of the site. With appropriate strategies in place to accommodate preservation of non-designated heritage assets and to respond positively to any identified heritage setting issues in the wider landscape, a development at the site could comply with all relevant policy and guidance at local and national level.
- 5.3 There are no 'in principle' constraints on ecological grounds. There are no statutory designations within the site, nor any within the site's likely zone of influence, that would be adversely affected as a result of the proposed development. Some habitats on the site's peripheries (adjacent to the M4 and within the Pucklechurch Ridge) are subject to non-statutory SNCI designation; however, these have considerable scope for enhancement through more sympathetic management. The site will likely contain a range of protected species for which surveys will be required, although it is anticipated that activity will be focused within the Pucklechurch Ridge along the west of site. Furthermore, any protected species populations can be readily accommodated within an appropriate layout and associated green infrastructure.
- 5.4 This preliminary landscape and visual appraisal finds that the character of the site is more heavily influenced by the settlement edge than the surrounding countryside, particularly given the existing development on site and the range of visual and audible urban influences of the surrounding road network.
- 5.5 The landscape and visual based assessment of how the site and its features contribute towards the purposes of the Green Belt is summarised below:
  - Purpose 1 the site currently contains built development and is influenced by numerous detractors, which compromise its openness to a significant degree and

give parts of the site a suburban character. The site has clear defensible boundaries on all sides;

- Purpose 2 although development of the site would bring the settlement of Pucklechurch closer to Bristol, keeping the Pucklechurch Ridge development free prevents any perceived merging;
- Purpose 3 in landscape character terms, the site currently has a strong semi-urban character with a fragmented mosaic of built, urban fringe, and agricultural land uses; and urban influences from adjacent settlement and transport routes. Considered masterplanning as discussed above would safeguard the encroachment into the countryside;
- Purpose 4 there is no proximity or intervisibility with the historic core of a town and thus the area does not perform against this function;
- Purpose 5 The site is entirely contained within the Green Belt and does therefore
  perform positively against this function. However, as demonstrated above, with the
  identified need for some development within the Green Belt, some development can
  occur in this location while, the Pucklechurch ridge continues to perform the essential
  functions of the Green Belt, preventing merging of settlements, encroachment and
  unrestricted sprawl.
- 5.6 Thus, it is considered that the site could reasonably be removed from the Green Belt and developed in accordance with the principles in the Concept Masterplan without harm to the integrity of the Green Belt overall.

# Appendix EDP 1 Assessment Methodology and Criteria

NPPF Para 80 Green Belt Purpose	Criteria	Application of Criteria to Site and Criteria Score
Purpose 1 To check the unrestricted sprawl of large built-up areas	Creates a clear, recognisable distinction between urban fringe and open countryside.	Does the site form a contiguous open buffer between the existing settlement edge and the wider countryside?  a. Yes, the site is free of development and associated influences and strongly contributes to the openness of the Green Belt (score: 3);  b. There is an absence of development within the site but it is overlooked by adjacent/nearby development (score: 2); and  c. No, the site contains development and/or does not clearly define a distinction between the settlement edge and the open countryside (score: 1).
	Defensible boundaries have a role in limiting unrestricted sprawl as they create the boundaries to Green Belt parcels. These may be within the site or form part of its boundary. Such boundaries can be permanent, such as roads, steep topography, woodland or require additional reinforcement such as hedgerows and streams. Fences do not form defensible boundaries.	Does the site have a defensible boundary which can prevent sprawl?  a. The site does not have a defensible boundary and therefore openness is greater (score: 3);  b. The site has a defensible boundary/boundaries, which would need additional reinforcement (score: 2); and  c. The site has a defensible boundary/boundaries, which do not require additional reinforcement (score: 1).
Purpose 2 To prevent neighbouring towns merging into one another	Settlements maintain a clear and sinuous edge.	<ul> <li>Is the site well associated with the existing settlement edge?</li> <li>a. The site is isolated from the settlement boundary and appears divorced from it (score: 3);</li> <li>b. The site abuts one settlement boundary but is not divorced from it (score: 2); and</li> </ul>

NPPF Para 80 Green Belt Purpose	Criteria	Application of Criteria to Site and Criteria Score
		c. The site abuts two or more settlement boundaries and therefore forms part of an indent (score: 1).
	Prevent loss or noticeable reduction in distance between towns/settlement edges; this may also be affected by agricultural land use or topography: a larger distance or more prominent topographical change would be better capable of accommodating change than a narrow gap.  The gaps may contain different elements, be it natural (e.g. topography, woodland, agricultural land or large open spaces) or man-made features, which prevent merging.	Given the distance between the whole of the site and next nearest settlement edge, what is the effect of the perceived and actual intervisibility or potential for coalescence?  a. Immediate and clear intervisibility with next nearest settlement edge (score: 3);  b. Partial visual association with next nearest settlement edges (score: 2); and  c. Limited or no visual association with next nearest settlement edges (score: 1).
Purpose 3 To assist in safeguarding the countryside from encroachment	The countryside comprises 'key characteristics' which define the landscape and the way it is perceived, both visually and physically.	To what extent does the site represent the key characteristics of the countryside?  a. The site is strongly representative of the key characteristics and clearly connects with off-site key characteristics. (score: 3);  b. The site comprises some representative key characteristics but there are few connections with off-site characteristics (score: 2); and  c. The site comprises little or no key characteristics and there is limited or no connection with off-site characteristics (score: 1).
	Encroachment: features such as speed signage and street lighting affect the extent to which the countryside changes from rural to urban.	To what extent is the site urbanised, either by on-site or off-site features?  a. There are no urbanising features within the site or directly influencing it (score: 3);  b. There are several urbanising features affecting the site (score: 2); and

NPPF Para 80 Green Belt Purpose	Criteria	Application of Criteria to Site and Criteria Score
		c. There are many urbanising features affecting the site, which reduces its representativeness of the countryside (score: 1).
Purpose 4 To preserve the setting and special character of historic towns	In the absence of professional judgement on setting and special character on a site-by-site basis by heritage consultants, the criteria considers the proximity of the site to the historic core of a town.	What is the spatial and visual relationship between the site and the historic core of the nearest towns?  a. The site shares a boundary with the historic core of the town, is partially or wholly within it or has clear intervisibility with the historic core (score: 2);  b. The site does not share a boundary with the town and/or there is no intervisibility with its historic core (score: 1).
Purpose 5 To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.	By association with the Green Belt designation, would assist in urban regeneration by directing development away from it.	<ul><li>a. The site is in the Green Belt (score: 2)</li><li>b. The site is not in the Green Belt (score: 1)</li></ul>

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# Appendix EDP 2 Green Belt Analysis

NPPF Para 80 Green Belt Test	Application of Criteria	Assessment	Criteria Score
Purpose 1: To check the unrestricted sprawl of large built-up areas	Does the site form a contiguous open buffer between the existing settlement edge and the other settlement areas/wider countryside?	The site contains a mixture of land uses, including agricultural land divided by tree belts, hedgerows and, the reservoir, numerous farm buildings, residential dwellings (including those along Parkfield Rank and other urban fringe land uses including extensive horse use and a landfill. The eastern portion of the site provides a definitive buffer to development and this assessment assumes it would be kept free from development.	1
	Are there any defensible boundaries?	As shown on <b>Plan EDP 3</b> , this newly proposed boundary follows strong defensible features such as roads and the Pucklechurch Ridge, with only short sections where some boundary reinforcement could be carried out to assimilate the development within its setting.	1
Purpose 2: To prevent neighbouring towns merging into one another	Is the site well- associated with the existing settlement edge?	The site lies adjacent to the western settlement edge of Pucklechurch. The Pucklechurch Ridge along the length of the western boundary provides separation from Emersons Green in Bristol. The site is well associated with the settlement edge of Pucklechurch to the east.	2
	What is the intervisibility with the next nearest settlement edge?	There is potential for limited intervisibility with Siston to the south. There will be intervisibility between the site and Pucklechurch.	2
Purpose 3: To assist in safeguarding the countryside from encroachment;	How representative is the site of the key characteristics of the countryside?	The site currently has a strong semi- urban character with a mix of built, urban fringe, agricultural and recreational uses as well as urban influences from adjacent settlement and transport routes. There is also some deterioration of landscape fabric where	2

NPPF Para 80 Green Belt Test	Application of Criteria	Assessment	Criteria Score
		hedgerows have been replaced with post and wire fences for horse paddocks and with complete removal of field boundaries associated with arable land use particularly in the central and northeastern portions of the site. Man-made landforms (such as the reservoir) have associated non-native planting to provide screening but is rather incongruous within the landscape. Comparatively, the countryside to the east is far more distinctive and representative of the host landscape character and makes a clear contribution to the setting of the AONB.	
	What is the influence of urbanising features?	The influence of urbanising features can be seen from all areas of the site. The settlement edge along the eastern boundary has a strong urbanising effect with the visual influence of residential dwellings, roads and street lighting. The central and north-east area of the site comprises a number of residential dwellings. The south and north-east area of the site abut both B4465 and the northern boundary abuts the M4, these areas are heavily influenced by the transport corridors, which are audible and visually legible as is the associated signage and junction with the A46. This site provides an area of land on the western edge of Pucklechurch that is physically and visually separated from the wider open countryside to the north, east and south.	1
Purpose 4: To preserve the setting and special character of historic towns;	What is the nature of the spatial and visual relationship between the site and the historic core of the nearest town?	There is no proximity or intervisibility with the historic core of a town and thus the area does not perform against this function.	1

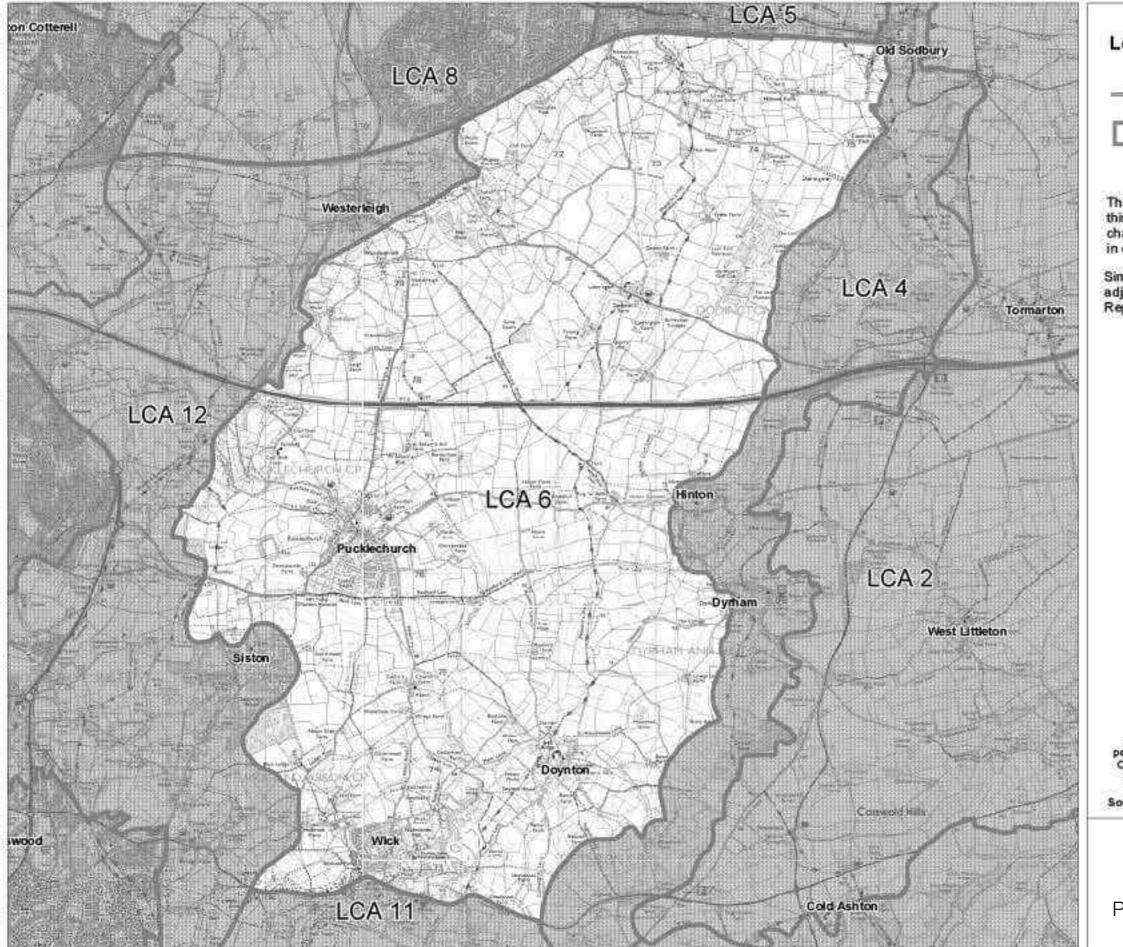
Purpose 5: To assist in urban regeneration, by encouraging the recycling of derelict and other urban land	Is the land within the Green Belt	The site is entirely within the Green Belt	2
			12

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# Appendix EDP 3 Landscape Character Extracts

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### LANDSCAPE CHARACTER AREAS



## Legend

South Gloucestershire Boundary

Landscape Character Area

The Landscape Character Area boundary shown on this map is indicative, sometimes marking a distinct change, but more often representing a transition in character with adjacent areas.

Similar attributes may therefore be evident within adjacent areas. (For further information refer to Report Section 4.1)



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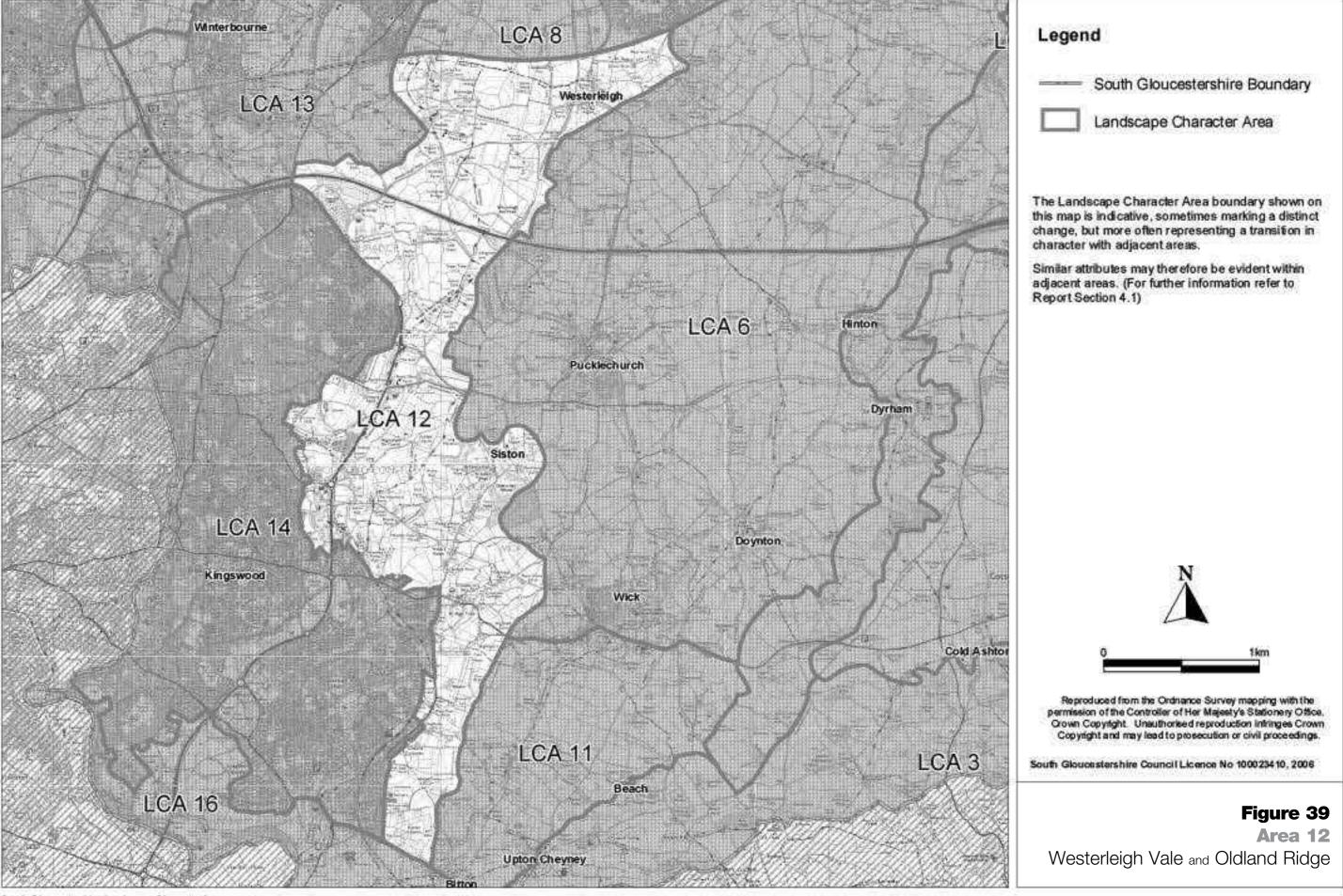
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## Figure 21

Area 6

Pucklechurch Ridge and Boyd Valley

### LANDSCAPE CHARACTER AREAS



South Gloucestershire Landscape Character Assessment

### **Plans**

Plan EDP 1 Environmental Planning Context

(EDP3485/04 08 December 2016 WG/FM)

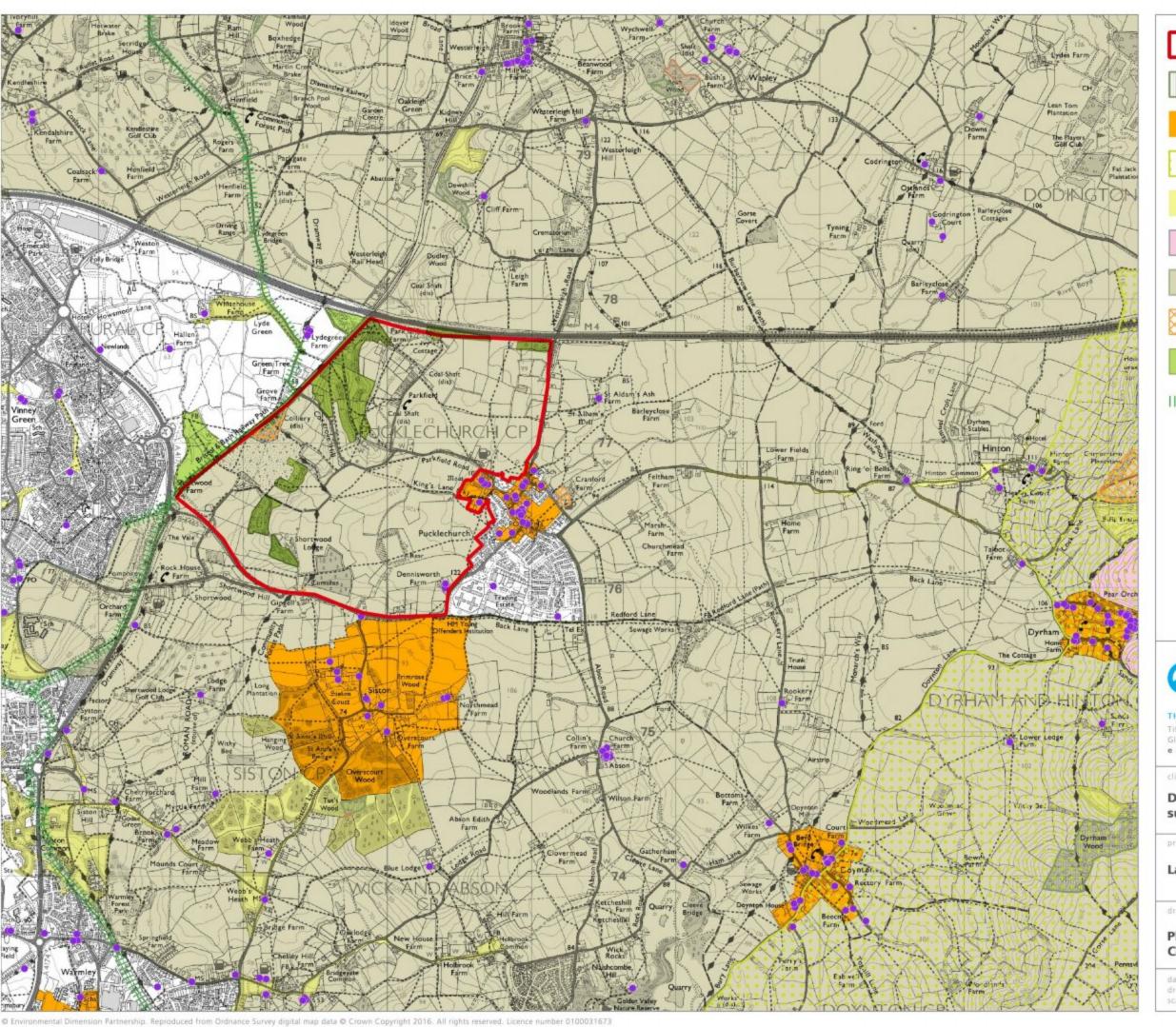
**Plan EDP 2** Constraints and Opportunities

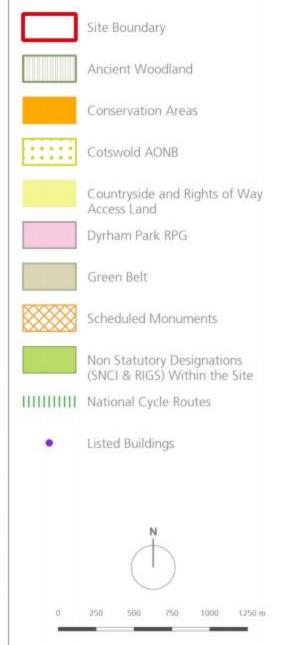
(EDP3485/10 14 December 2016 WG/FM)

Plan EDP 3 Topography Plan

(EDP3485/01 08 December 2016 WG/FM)

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Davison Family and IM Land Ltd, a subsidiary of IM Properties PLC

project title

Land to the West of Pucklechurch

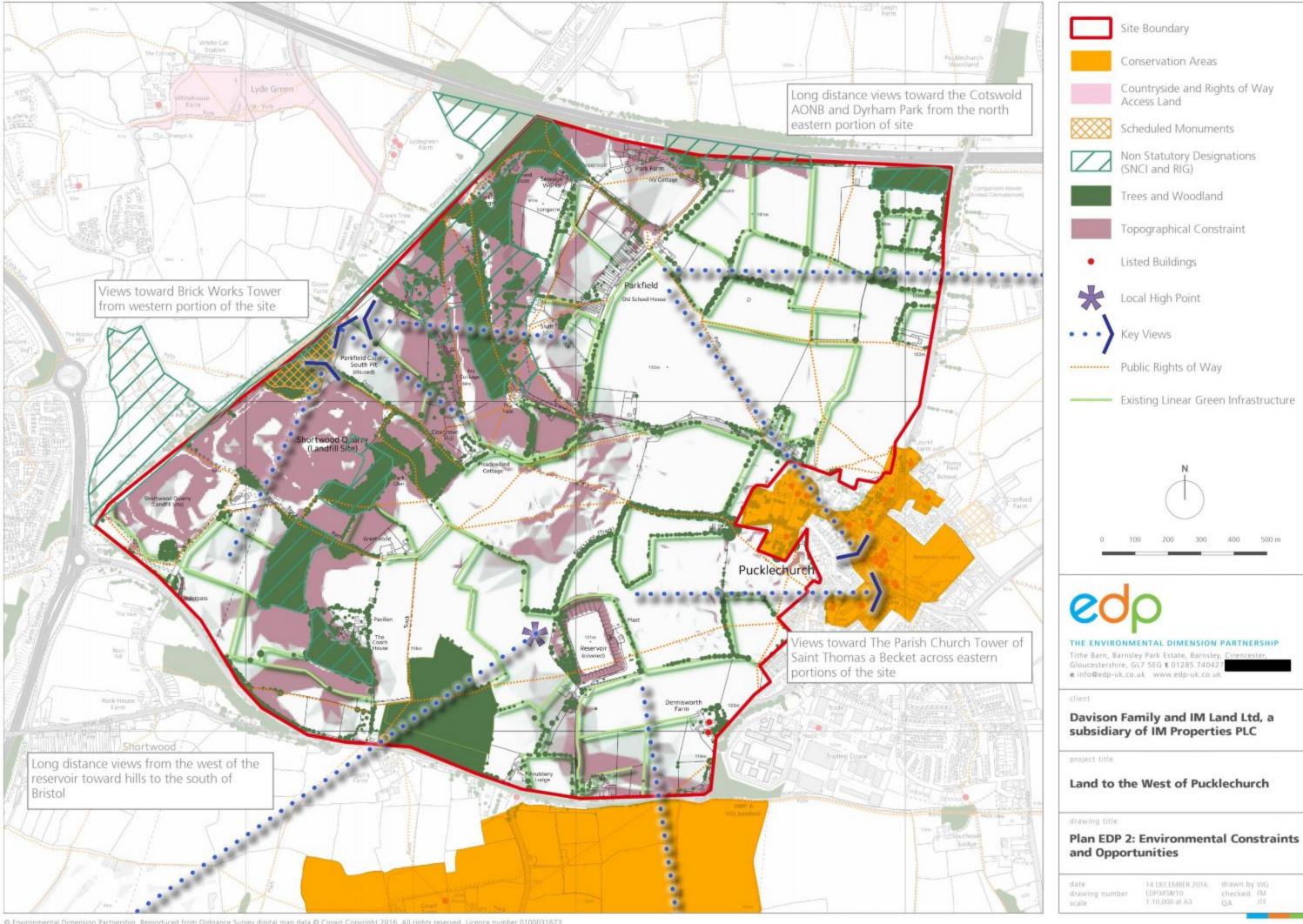
drawing title

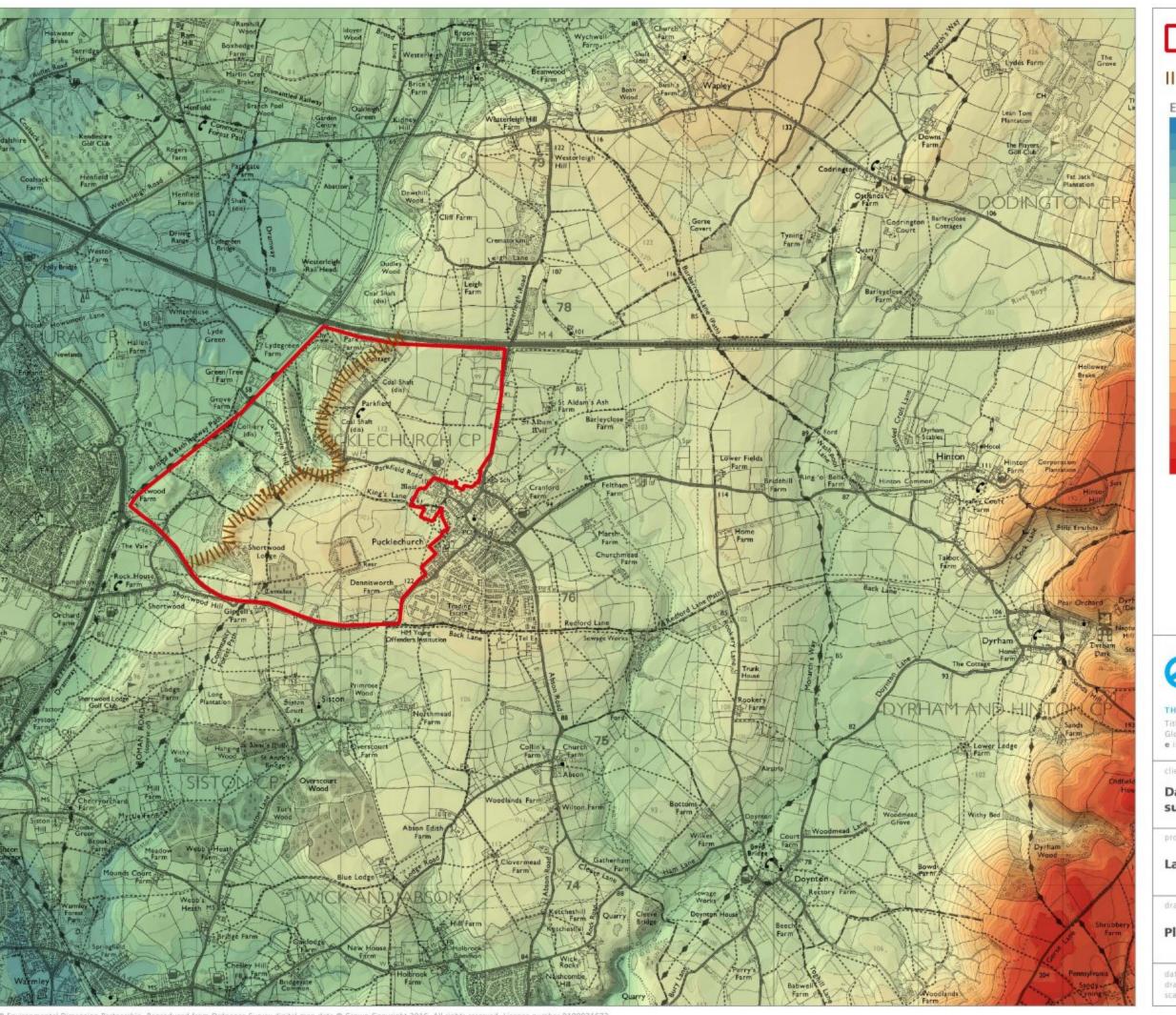
Plan EDP 1: Environmental Planning Context

drawing numbe scale

EDP3458/04 1:25,000 at A3

08 DECEMBER 2016 drawn by WG EDP3458/04 checked PM 1:25,000 at A3 QA JTF









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Davison Family and IM Land Ltd, a subsidiary of IM Properties PLC

project title

Land to the West of Pucklechurch

drawing title

Plan EDP 3: Topography Plan

drawing r scale

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