



LAND SOUTH OF A46 SHURDINGTON ROAD, CHELTENHAM

Landscape and Visual Response on the Leckhampton with Warden Hill Neighbourhood Development Plan

by

Hankinson Duckett Associates

for

Miller Homes Ltd

HDA ref: 436.16/CM

Issue: 01

Date: March 2024

hankinson duckett associates

t 01491 838175 **f** 01491 838997 **e** consult@hda-enviro.co.uk **w** www.hda-enviro.co.uk

The Stables, Howbery Park, Benson Lane, Wallingford, Oxfordshire, OX10 8BA

Hankinson Duckett Associates Limited Registered in England & Wales 3462810 Registered Office: The Stables, Howbery Park, Benson Lane, Wallingford, OX10 8BA

1 INTRODUCTION

1.1 Scope of Work

1.1.1 This response considers landscape and visual (L&V) aspects of the Regulation 16 Version (titled Regulation 15 Submission) of the Leckhampton with Warden Hill Neighbourhood Plan (LWHNP, dated June 2023). The LWHNP has been prepared by Leckhampton with Warden Hill Parish Council (LWHPC) and submitted to Cheltenham Borough Council (CBC) for public consultation.

1.1.2 This response reviews the landscape and visual aspects of the following policies within the LWHNP:

- Policy LWH3 – Managing and Enhancing Local Green Space (page 37);
- Policy LWH4 – Green Infrastructure (page 40); and
- Policy LWH5 – Conserving and Enhancing Valued Landscape (page 46).

2 DOCUMENTS AND DRAWINGS REVIEWED

2.1 The Neighbourhood Plan

2.1.1 The LWHNP includes the following Appendices and Annexes which are considered relevant to this L&V response:

- 1) Appendix 2: Green Infrastructure List;
- 2) Appendix 3: Statement on valued landscape;
- 3) Annex 1: Consultation Report, including the following appendices:
 - a. Appendix A – Consultation Report for First Regulation 14 Draft Neighbourhood Plan September 2021;
 - b. Appendix F – Response from Miller Homes to Regulation 14 Consultation, April 2023; and
 - c. Appendix G – Lepus Consulting Landscape Consultation Response;
- 4) Annex 4: Landscape Character Assessment update and evaluation of Landscape Value 2022.

3 RECOMMENDATIONS

3.1 Suggested Changes

3.1.1 Policy LWH3 – Delete this policy, which is considered to be redundant, or re-word it as proposed at paragraph 4.1.8 of this response.

3.1.2 Policy LWH4 – Delete this policy, which is considered to be redundant.

3.1.3 Policy LWH5 – Either delete this policy as the evidence is flawed, or “undertake a detailed assessment of each of the areas of the wider study area” to realistically reflect the “variety in the quality of the landscape across the area” (quotes taken from the Inspector’s report for the appeal for the ‘land south of A46 Shurdington Road’).

4 REVIEW OF POLICY LWH3

4.1 Policy LWH3 – Managing and Enhancing Local Green Space

4.1.1 National policy on 'Local Green Space' (LGS) is set out in paragraphs 105 to 107 of the NPPF (December 2023). Paragraph 105 states:

The designation of land as Local Green Space through local and neighbourhood plans allows communities to identify and protect green areas of particular importance to them. Designating land as Local Green Space should be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services. Local Green Spaces should only be designated when a plan is prepared or updated, and be capable of enduring beyond the end of the plan period.

4.1.2 Paragraph 106 states:

The Local Green Space designation should only be used where the green space is:

- a) In reasonably close proximity to the community it serves;*
- b) Demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and*
- c) Local in character and is not an extensive tract of land.*

4.1.3 Paragraph 107 states:

Policies for managing development within a Local Green Space should be consistent with those for Green Belt.

4.1.4 As stated in paragraph 149 of the LWHNP, the defined area of Leckhampton Fields (as shown on Figure 11 at page 36 of the NP) has been designated by CBC (at the request of the LWHPC) as LGS within the Cheltenham Plan (CP, adopted July 2020), under **Policy GI1** (page 82 of the CP), which states the following:

Development will not be permitted within a Local Green Space, designated either within the Cheltenham Plan or an approved Neighbourhood Plan, unless there are very special circumstances which outweigh the harm to the Local Green Space. Particular attention will be paid to the views of the local community in assessing any development proposals that affect a designated Local Green Space.

4.1.5 It is considered unnecessary to duplicate the CBC policy on LGS with Policy LWH3 in the LWHNP. The use of the planning application process to regulate control within (and adjacent to) LGSs is demonstrated by the point made by the Inspector, Ms Zoe Raygen, in her report on the appeal for the 'land south of A46 Shurdington Road', as allowed by the Secretary of State on 27 February 2024. Paragraph 115 of her report states the following

Part of the appeal site extends into the neighbouring LGS beyond the allocation in Policy MD4. However, this area would be developed as community orchard and allotments. The area would therefore still operate as LGS. Consequently, there would be no harm caused and no conflict with Policy GI1 of the CP.

- 4.1.6 In addition, according to Table 7 in the CP (page 83), of all the sites designated as LGS, the Leckhampton LGS is by far the largest at 26.4ha, and certainly cannot be considered to be a “fairly small parcel(s) of land” (paragraph 151 of the LWHNP). The continued inclusion of Policy LWH3 within the LWHNP is purported on the following basis:

“...it is important now to ensure that the LGS is managed and enhanced so that its use is promoted and its importance as a local resource for green infrastructure and as an important component of the local Valued Landscape is protected”.

- 4.1.7 The management and enhancement of the LGS is not solely the responsibility of the LWHNP and would more likely rest with CBC and/or the landowners. Policy G11 states that “attention will be paid to the views of the local community in assessing any development proposals that affect a designated LGS” but this does not specifically extend to development proposals outside the boundaries of the LGS. In contrast, Policy LWH3 of the LWHNP specifically looks to control development outside the boundaries of the LGS by referring to “proposals associated with proposals for new development on sites adjoining the LGS”, which, logic would suggest, is the allocated land under Policy MD4, as this is the only site allocated for development that lies adjacent to the LGS. In short, the purposes of one policy should not extend into the boundaries of another area covered by a different policy. It is specifically recognised in paragraph 154 of the LWHNP that the site adjoining the LGS is the housing allocation site identified under Policy MD4. The control of development on the allocated housing site adjoining the LGS should be within the scope of Policy MD4 and there should be no need to have secondary controls placed upon the site by this proposed Policy LWH3.

- 4.1.8 Policy LWH3 should therefore be removed as it is considered to be redundant, or the wording of the second part of the policy should be amended so it refers only to land within its boundaries, as follows:

Landscaping, planting, biodiversity mitigation and net gain, and pedestrian/cycle access proposals within the boundaries of the Local Green Space should have regard to the history, landscape and rural nature of the Local Green Space and to management and improvement objectives developed for the Leckhampton Fields Local Green Space.

5 REVIEW OF POLICY LWH4

5.1 Policy LWH4 – Green Infrastructure

- 5.1.1 Three of the sites identified on Figure 12: ‘Green Infrastructure Sites’ (page 39) and described in Appendix 2: ‘Green Infrastructure List’ of the LWHNP coincide with the site allocated for housing in the Cheltenham Plan (CP, adopted July 2020) under Policy MD4. The three sites are:

- Site 6 – Line of Hatherley Brook and neighbouring flood zone;
- Site 7 – Field parcels R2 and R3 (as identified during the Joint Core Strategy (JCS) process);

- Site 17 – Hedgerows and trees in and around fields and smallholdings (and identified during the JCS process as NE fields). These fields are bound to the east by Moored Stream and the old parish boundary, to the north by A46 Shurdington Road, to the south by the LGS boundary south of Footpath CHL6, and to the west by a small access road.

5.1.2 The proper mechanism for positively considering the retention and provision of new green infrastructure is through the planning application process for the allocated site through Policy MD4 in the CP. To introduce a second level of control or regulation is therefore unnecessary, making the inclusion of Sites 6, 7 and 17 as shown on Figure 12 of the LWHNP superfluous.

5.1.3 References to Fields R2 and R3, which lie within the allocated site under Policy MD4, should not now be included within the descriptions for Sites 6 and 7 in Appendix 2 of the LWHNP. The way the green infrastructure features, such as accompanying hedges, would be accommodated within the allocated site has been summarised by the Inspector, Ms Zoe Raygen, in her report on the appeal for 'land south of A46 Shurdington Road', as allowed by the Secretary of State on 27 February 2024. Paragraphs 116 and 117 of her report state the following:

116. *In the context of the history of the appeal site I have outlined above [33-38], I understand residents' concerns regarding development of this area, which they consider to be an erosion of their local valued landscape, particularly of parcels of land R2 and R3. However, I have explained above that these are part of an allocation for housing [Policy MD4 of the CP]. Notwithstanding this I saw at my site visit that the two fields have some local quality. Both are strongly delineated by hedgerows and R3 in particular contains a number of trees as well as hardstanding and derelict greenhouses. However, the degree of containment means that they are not prominent in local views. The hedges form pleasant edges to Kidnappers Lane and the PRow alongside the field boundaries.*
117. *The proposal would see the field at R3 form an area of open space with a well treed boundary to Kidnappers Lane retaining existing features. This would ensure that the landscape appearance of the area would be little changed. Field R2 would be developed with housing but with a greenspace and landscaping at its southern boundary retaining the existing hedge. Outwardly therefore, although R2 would have housing on it, it would retain its green edge.*

5.1.4 The ability for green infrastructure to be adequately addressed through the planning application process is a view reinforced in the Inspector's report for the appeal for 'land south of A46 Shurdington Road'. Paragraph 119 of her report states the following:

The appellant's Green Infrastructure Strategy (GIS) means that the predominant green area viewed from the AONB, which forms the Hatherley Brook corridor, would be largely retained. This together with additional planting and the high quality architecture and design means that the housing would not be viewed as one large mass from the AONB but would integrate satisfactorily into the existing landscape. Consequently, views from the AONB would not be harmed and its setting would be preserved thereby conserving its landscape and scenic beauty. Therefore, I am satisfied that the proposal has taken onboard the JCS Inspector's finding as required by Policy MD4 as this was a key concern of that Inspector at that time.

- 5.1.5 As demonstrated by this appeal decision, the roles and functions of existing green infrastructure can be adequately considered within the planning application process for sites that are already allocated within the local development framework for Cheltenham. As stated at paragraph 159 of the LWHNP, the bulleted list of “*a number of components which together have the potential to make up an important network of habitats, open spaces, green corridors and wildlife habitats*” is already “*covered by general policy protections in adopted local plans*”. Thus by its own admission, Policy LWH4 of the LWHNP is superfluous and should be deleted.

6 REVIEW OF POLICY LWH5

6.1 Policy LWH5 – Conserving and Enhancing Valued Landscape

- 6.1.1 National policy on ‘valued landscape’ is provided by Policy 180 of the NPPF, the first part of which states:

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

- a) *Protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan).*

- 6.1.2 The extent of the allocated site (including the areas R2 and R3) covered by Policy MD4 of the adopted Cheltenham Plan (allocated for 350 dwellings) has no statutory landscape designations attached to it.

- 6.1.3 The wording of adopted Policy MD4: ‘Leckhampton’ is provided at page 7 of Annex 1 - Consultation Report. A map showing the boundary of the site allocation for Policy MD4 is provided at page 13 of Annex 1. This map also shows the ‘indicative area for secondary school’, which has already been built out.

- 6.1.4 The evidence presented on ‘valued landscape’ as part of the NP includes the following:
- Annex 4 – ‘Landscape Character Assessment Update with and evaluation of Landscape Value’, by Lepus Consulting, dated September 2022 (113 page PDF).
 - Appendix 3 – ‘Statement on valued landscape’, September 2022 (3 page PDF, primarily with summary quotes from Annex 4).
 - Annex 1 (Regulation 15 Consultation Report, June 2023), specifically Appendix G – Technical Note: Landscape Consultation Response, by Lepus Consulting, 24 May 2023 (10 page PDF).

- 6.1.5 Issues with Annex 4 were flagged up in previous representations prepared by Miller Homes to the NP (for the Regulation 14 consultation stage, dated 11 April 2023). The issues with Annex 4 included its “*broad-brush approach to assessment, based on considering the study area as a single large Landscape Character Area (LCA)*” (paragraph 7.4, page 11).

A response to the representations received from Miller Homes has been made in the form of Appendix G (by Lepus Consulting) within Annex 1.

- 6.1.6 Within Appendix G, Lepus Consulting continue to maintain that “*it would not be appropriate to sub-divide the study area into smaller assessment units which would erode the nature of this mosaic*” of land uses (paragraph 1.4.6, page 2). This approach fails to recognise that the study area (74ha in extent – paragraph 1.5.1), by virtue of its mosaic of land uses, does not have “*consistent landscape characteristics*” (para 1.4.3) across its full extent and certainly could not be considered to have the same landscape value across its full extent. The most obvious difference in the value of the landscape, is that the southern part of the study area lies within the nationally designated landscape of the Cotswolds. The Cotswolds National Landscape (formerly AONB) is, by definition, a valued landscape (in terms of paragraph 180a) of the NPPF) and thus should be separated from the remaining landscape within the study area, when considering judgements of landscape value.
- 6.1.7 Appendix G also uses the ‘Landscape Characterisation Assessment and Sensitivity Analysis’ prepared to support the preparation of the JCS (2011), as justification for not subdividing its study area. The study area defined in the Annex 4 report lies within a single Landscape Character/Study Area A: ‘Leckhampton’, which is also referred to as Landscape Sensitivity Area C1: ‘Leckhampton (north)’, in the JCS assessment (pages 50 and 61). The area within the Cotswolds National Landscape is excluded from the JCS assessment, however, it is evident that the ‘High-Medium Sensitivity’ for Area C1 is exaggerated due to the influence of, and proximity to, the National Landscape and the study area being “*readily viewed from the AONB*”, which the Miller Homes site is not.
- 6.1.8 It is recognised within the JCS assessment that this is a “*broad scale classification*” (page ii), and that “*areas will be subject to further layers of constraint and sensitivity analysis*” which “*might highlight additional constraints making parts of less constrained areas unsuitable for development*” though that may conversely make parts of constrained areas suitable for development. This was evidently the case with the allocation of the site covered by Policy MD4, which, despite lying within the ‘High-Medium Sensitivity’ of Area C1, was still considered suitable as a housing allocation.
- 6.1.9 The presence of the derelict and disused greenhouses and associated hardstanding across the northern part of the study area, together with the proximity of urbanising influences such as the A46 and existing residential areas, are inevitably going to have some influence in reducing the value of the landscape within the area covered by Policy MD4, particularly when compared to the landscape value of those parts of the study area further to the south and more heavily influenced by the rising landform of the Cotswolds. Whilst it may be recognised that the study area, as a whole, is locally valued (paragraph 1.5.2 of

Appendix G), it is not a valued landscape in the terms of paragraph 180a), where value is specifically qualified as being “*in a manner commensurate with their statutory status or identified quality in the development plan*”. The northern part of the study area is identified as a housing allocation site under Policy MD4.

- 6.1.10 The issues with Annex 4 have been succinctly summarised in the Inspector’s report to the appeal for ‘land south of A46 Shurdington Road’, with paragraph 113 stating the following:

Part of the evidence for the NP is formed by a report by Lepus Consulting carried out using the LI TGN21 guidelines (should be TGN 02-21) in September 2022. However, the report does not, in my view, undertake a detailed assessment of each of the areas of the wider study area rather finding the whole area has value. It was clear to me at my site visit that while much of the area displayed valued landscape characteristics, these were more apparent in some areas than others creating variety in the quality of the landscape across the area as found during the JCS and CP process.

- 6.1.11 The Landscape Institute’s Technical Guidance Note ‘TGN 02-21 Assessing Landscape Value Outside National Designations’ (February 2021) provides a range of factors ¹ that can be considered when identifying ‘landscape value’. These factors are not presented in any order of importance, and are not intended to be exhaustive. Landscape value, along with susceptibility to change, is one of two components of landscape sensitivity.

- 6.1.12 TGN 02-21 states:

“GLVIA3 ² recognises that landscape value is not always signified by designation: “the fact that an area of landscape is not designated either nationally or locally does not mean that it does not have any value” (paragraph 5.26). GLVIA3 recommends that when undertaking a LVIA/LVA in an undesignated area, landscape value should be determined through a review of existing assessments, policies, strategies and guidelines and, where appropriate, by new survey and analysis (paragraphs 5.27 and 5.28). It is recommended that the process for identifying landscape value outside nationally designated areas is based upon a structured and transparent assessment process including community-based evidence where practical to do so”.

- 6.1.13 TGN 02-21 also states that the key points to note are as follows:

- *“It would be expected that a ‘valued landscape’ would demonstrate the presence of a number of indicators of landscape value, as set out in Table 1 (of TGN 02/21, pages 7 to 11), although it is possible for one indicator to be of such importance (e.g., rarity, association or perceptual aspects) that the landscape is judged to be a ‘valued landscape’ even if other indicators are not present.*
- *The identification of landscape value needs to be applied proportionately ensuring that identification of ‘valued landscape’ is not over used.”*

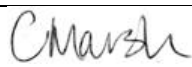
¹ Refer to Table 1 on pages 7-11 of the TGN, and also included as Appendix E in the Lepus 2022 report which is Annex 4 of the Reg 16 NP Submission.

² ‘Guidelines for Landscape and Visual Impact Assessment’ Third Edition, by the Landscape Institute and Institute for Environmental Management & Assessment, April 2013.

6.1.14 The table in **Appendix A** of this response presents an evaluation of the site allocated under Policy MD4 and its context against the factors identified in TGN 02-21, drawing on a range of evidence such as that indicated as examples in TGN 02-21 and surveys undertaken specifically for the site.

HDA Document Control and Quality Assurance Record

Project Title: Shurdington Road, Cheltenham, LS
Project Reference: 436.16
Document Title: Landscape and Visual Response on the LWHNP
Commissioning Party: Miller Homes Ltd

Issue	Description	Date of Issue	Signed
1	First draft Version 1	March 2024	
2			

	Personnel	Position
Author	Christine Marsh	Associate
Approved for issue	Tanya Kirk	Director

© Hankinson Duckett Associates. All rights reserved

No part of this report may be copied or reproduced by any means without prior written permission from Hankinson Duckett Associates. If you have received this report in error, please destroy all copies in your possession or control and notify Hankinson Duckett Associates.

This report has been prepared for the exclusive use of the commissioning party and unless otherwise agreed in writing by Hankinson Duckett Associates no other party may use, make use of or rely on the contents of the report. No liability is accepted by Hankinson Duckett Associates for any use of this report, other than for the purposes for which it was originally prepared and provided.

Opinions and information provided in the report are on the basis of Hankinson Duckett Associates using reasonable skill, care and diligence, taking into account the manpower, resources, investigations and testing devoted to it by agreement of the client, and no explicit warranty is provided as to its accuracy. It should be noted and it is expressly stated that no independent verification of any of the documents or information supplied to Hankinson Duckett Associates has been made.

The report and any dispute or claim arising out of or in connection with it or its subject matter shall be governed by the law of England and the courts of England shall have exclusive jurisdiction to settle any dispute or claim that arises out of or in connection with the report, or its subject matter.

APPENDIX A

Evaluation of Landscape Value

APPENDIX A

Evaluation of Landscape Value

1.1 Introduction

- 1.1.1 This appendix sets out an evaluation of the site allocated under Policy MD4 and not the full extent of the LCA Study Area Boundary considered by Lepus Consulting in its 2022 report (refer to Figure 1.1 Location Plan on page 10 of the Lepus report, which is also Annex 4 of the LWHNP).

Definition	Indicators/Evaluation
Factor: Natural Heritage	
Landscape with clear evidence of ecological, geological, geomorphological or physiographic interest which contribute positively to the landscape.	<p><u>Indicators:</u> The site contains a number of features that contribute positively to the ecology of the landscape, which are as follows:</p> <ul style="list-style-type: none"> The Ecological Appraisal (by HDA, March 2020) identified several hedgerows on the site (16no boundaries listed as hedges at paragraph 4.5.1), though only two (on the southern site boundary) were identified as 'important' under the ecological criteria of the Hedgerow Regulations 1997. The Tree Survey Report and Arboricultural Impact Assessment (by HDA, August 2021) identified one tree within the site as warranting Category A status (BS5837:2012) (paragraph 4.3.2), however, no trees on the site were classified as 'veteran' or ancient. The Tree Survey Report also identified 58 trees, 37 groups of trees and 17 hedgerows within the Site, as being of Category B. Six trees are the subject of a Tree Preservation Order, and the site is not within a Conservation Area. <p>The Ecological Appraisal states that the site is not designated (statutory or non-statutory) for its ecology, nature conservation or biodiversity value, and nor is any of the land immediately adjacent to the site. Features observed on the site of moderate local nature conservation value (traditional orchard, semi-improved grassland and woodland corridors) do not warrant any local or national statutory designation, though "wherever possible, the proposed development should include the retention and protection of these habitats" (paragraph 8.3.11).</p> <p><u>Evaluation:</u> The features identified within the site are generally commonly found within the surrounding landscape. Whilst they contribute to the character of the site and its immediate surroundings, they are not of any wider importance or value.</p>
Factor: Cultural Heritage	
Landscape with clear evidence of archaeological, historical or cultural interest which contribute positively to the landscape.	<p><u>Indicators:</u> OS mapping from 1811 indicates the land of the site as being part of a large, open field system (paragraph 4.27 of the Heritage Statement by RPS, September 2020), with some internal subdivisions evident by 1903, associated with market gardening (paragraph 4.30). The site retains some characteristics present since this time, with the continued use by market gardening, areas of allotments and a plant nursery. The Heritage Statement identifies no assets within the site,</p>

Definition	Indicators/Evaluation
	<p>though a Grade II Listed Building (Hampton House) lies within 75m of the site boundary, on the north side of the A46. A Scheduled Monument, comprising a moated site with two adjacent fishponds, is located 570m to the south of the site. The Heritage Statement states “that the proposed development would not affect the significance of the SM” (paragraph 4.4).</p> <p>No other historic landmark structures or designed landscape elements, historic parks and gardens, or heritage assets are recorded or evident within the site.</p> <p><u>Evaluation:</u> The features identified within the site contribute to its historic character, however, none of the assets identified are considered to be more than local value.</p>
Factor: Landscape Condition	
Landscape which is in a good physical state both with regard to individual elements and overall landscape structure.	<p><u>Indicators:</u> The site has a relatively intact historic field pattern, although some internal field boundaries have been lost. However, the built edges of Leckhampton, on three of the site’s four sides, to west, north (defined by the A46) and east, do have a detracting influence on the site and its surroundings.</p> <p><u>Evaluation:</u> The landscape within the site is very variable in condition (Lepus refer to “a few informal buildings and structures associated with the small holdings and former nurseries, particularly towards the north of the site, which are used, although may benefit from greater maintenance” (page 53 of 2022 report), some of it good, but much is poor. The surveys undertaken of the site do not suggest that its condition should be considered of higher value than other areas of land of a similar nature elsewhere in the local area.</p>
Factor: Associations	
Landscape which is connected with notable people, events and the arts.	<p><u>Indicators:</u> Whilst views from Leckhampton Hill may have been included within known art works, these do not specifically highlight the site (small part of a much wider view). Any association between Dr Edward Wilson and the site is tenuous. No records have been identified to indicate that the site has any associations with notable people, literature, art or events.</p> <p><u>Evaluation:</u> There is no indication that the site should be considered of higher value than other areas of land of a similar nature elsewhere in the local area.</p>
Factor: Distinctiveness	
Landscape that has a strong sense of identity.	<p><u>Indicators:</u> The character of the site contrasts with that of the prevailing land-uses around Leckhampton, which, in the immediate vicinity of the site, is mainly residential development, although with some open space uses to the south of the site (Lotts Meadow). There are no distinctive, rare or unusual features that confer a strong sense of place or identity. It is recognised that the site forms a gateway or approach to Cheltenham, but one that could be improved with proposed development on the site.</p> <p><u>Evaluation:</u> There is no evidence to indicate that the site should be considered of higher value than other areas of land of a similar nature elsewhere in the local area.</p>

Factor: Recreational	
Landscape offering recreational opportunities where experience of landscape is important.	<p><u>Indicators:</u> Public access to the site is limited at present, with Footpath CHL/6 running along the south-eastern site boundary (and proposed to be retained along the northern edge of the Local Green Space). Public access is possible to the landscape to the south of the site, across the Cheltenham designated Local Green Space.</p> <p><u>Evaluation:</u> Given the lack of public access to the site and the small number of PRowWs in the immediate vicinity of the site, there is no indication that recreational value should be any greater than Limited.</p>
Factor: Perceptual (Scenic)	
Landscape that appeals to the senses, primarily the visual sense.	<p><u>Indicators:</u> The site is relatively well contained by existing residential development on three of its four sides. The site forms a small part of panoramic views from Leckhampton Hill but is seen in the context of other developments lying to the south of the site (the new secondary school). The site does not comprise any striking landforms or memorable landmarks. Whilst the site has some rural context, it is typical of commercial market garden uses, with associated urbanising structures and proximity to existing residential areas.</p> <p><u>Evaluation:</u> There is no evidence to indicate that the site contains any distinctive features or scenic qualities that appeal to the senses any more than the surrounding context.</p>
Factor: Perceptual (Wildness and Tranquillity)	
Landscape with a strong perceptual value notably wildness, tranquillity and/or dark skies.	<p><u>Indicators:</u> A degree of tranquillity is experienced in the southern part of the site (adjacent to the LGS). However, the presence of adjacent residential areas, and the transport corridor of the A46 along the northern site boundary affects both tranquillity and any potential for dark skies. The market garden uses within the site have altered the landscape so that it cannot be considered wild.</p> <p><u>Evaluation:</u> There is no evidence to indicate that the site and its context experience dark skies or consist of areas of wildness, and there is limited tranquillity within the site.</p>
Factor: Functional	
Landscape which performs a clearly identifiable and valuable function, particularly in the healthy functioning of the landscape.	<p><u>Indicators:</u> The site is crossed by the Hatherley Brook and adjoins the Moorend Stream along its eastern boundary. Whilst the floodplains associated with these watercourses could be considered to be part of the 'healthy functioning' of the landscape, they are a constraint to development which has to be accommodated within any proposals that come forward as part of Policy MD4. Apart from this identifiable function, there is no evidence to indicate that the rest of the site (or its landscape elements) are important to the 'healthy functioning' of the landscape. Given the past uses for the site (as market gardening) there is the potential for areas of improved soil within the site, though there are unlikely to natural areas of undisturbed soils or areas that form carbon sinks, such as peat bogs, or extensive tracts of woodlands.</p> <p><u>Evaluation:</u> The site comprises limited features that could contribute to the 'healthy functioning' of the landscape, but it should not be considered to be of higher value to other areas of land of a similar nature elsewhere in the local area.</p>

- 1.1.2 TGN 02/21 makes clear at paragraph A4.2.12 that “*where possible the development plan should be referenced to support the value placed on the landscape. Where the development plan is silent, evidence should be provided in the form of professional analysis*”. In the case of the site, the development plan does not contain evidence that the landscape has particular value (hence its designation for development under Policy MD4).
- 1.1.3 On the basis of the evaluation above, the landscape value of the site and its immediate context should not be considered as a ‘Valued Landscape’ in terms of the NPPF paragraph 180a), though it is recognised that it has some value to the community. The allocated site is an ‘everyday’ landscape which is appreciated by the local community but has little or no wider recognition of its value.