JOINT LOCAL PLAN

EVIDENCE BASE DOCUMENT

Heritage Impact Assessment
February 2017
Plymouth and South West Devon Joint Local Plan Heritage Impact Assessment

Introduction

1. This document explores the impact of the site allocations in the Plymouth and South West Devon Joint Local Plan (the JLP) on the historic environment in respect of the area covered by Plymouth City Council, West Devon Borough Council and South Hams District Council (excluding Dartmoor National Park) until 2034. The Joint Local Plan includes two policies directly related to the historic environment, namely: Policy DEV21 (Conserving the Historic Environment) and Policy DEV22 (Development affecting the historic environment). The Joint Local Plan seeks to ensure that it will protect and encourage the enhancement of heritage assets including Scheduled Monuments, statutorily and locally listed buildings, Registered Parks and Gardens and Conservation Areas.

2. The historic environment covers a wide range of resources, including buildings, structures, archaeological remains, landscape features and historic open spaces, which come under the umbrella term of ‘heritage assets’. For the purpose of this document, heritage assets are separated into those that have been designated, and those that are ‘non-designated’. Designated heritage assets include:
   a. World Heritage Sites
   b. Listed buildings
   c. Registered parks and gardens
   d. Scheduled monuments
   e. Conservation areas
   f. Protected wrecks

3. Non-designated heritage assets are buildings, sites, places and landscapes that have been identified as having a degree of significance meriting consideration in planning decisions because of their heritage interest that are not currently designated.

4. Plymouth, South Hams and West Devon all benefit from a rich and varied historic environment, much of which is characteristic of the area in which it has evolved and whilst some aspects of the historic environment is afforded national protection in law, other aspects are protected by local policy.

The JLP area

5. Within the plan area, there are a great number of heritage assets with over 1100 Scheduled Ancient Monuments, 86 Conservation Areas and 5,900 Listed Buildings, providing important cultural, economic and environmental benefits.

The challenges for the historic environment

6. The strategy for the JLP area seeks an ambitious programme of growth for new homes and jobs, recognising the role each area plays in creating a strong and successful sub-region. This poses a challenge in how to ensure this growth can be successfully and sensitively accommodated in the area without having a detrimental impact on the heritage assets which contribute to the attractiveness of the south west Devon area.

Purpose and scope of the Heritage Impact Assessment

7. In order to meet the growth requirements in Plymouth, South Hams and West Devon (outside of the Dartmoor National Park), the Joint Local Plan needs to allocate land for development over the plan period. This strategy of sustainable development is based on evidence, including this Heritage Impact Assessment.

8. The focus of growth in the JLP is in the Plymouth Policy Area, recognising the City as the most sustainable location for growth and with more opportunities for development on brownfield sites.
However, it is also important that the Thriving Towns and Villages (the areas of South Hams and West Devon outside of the Plymouth Policy Area) continue to be successful places to live and work, and appropriate development is also proposed in this area in the main towns, smaller towns and key villages to meet locally identified needs.

9. The purpose of this Heritage Impact Assessment (HIA) is to support the Joint Local Plan by demonstrating how the historic environment has been considered in the site selection process and to assess the likely impact on heritage assets, both designated and non-designated, and whether any impact can be mitigated. Both designated and non-designated heritage assets are considered in the assessment.

10. All sites, both housing and employment, which are being considered for allocation in the JLP have been assessed. The assessment informed site specific allocations as well as policy DEV21 and DEV22 of the JLP and to draw attention to heritage considerations and how they could be mitigated for.

Policy Sources

11. Protection of the historic environment comes from:
   (ii) The Ancient Monuments and Archaeological Areas Act 1979; and
   (iii) Policy expressed in the National Planning Policy Framework (paragraphs 126-141, 169-170) that is explained in the Planning Practice Guidance (“Conserving and enhancing the historic environment”)

National Planning Policy requirements

12. The National Planning Policy Framework acknowledges the significance of the historic environment by identifying it as one of the key features of sustainable development in that ‘pursuing sustainable development involves seeking positive improvements in the quality of the built, natural and historic environment, as well as in people’s quality of life’ (paragraph 9). It notes that one of the twelve core principles of the planning system is to “conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations.” (paragraph 17)

13. Paragraph 126 of the NPPF requires Local Plans to set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. This strategy should recognise that heritage assets are an irreplaceable resource and conserve them in a manner appropriate to their significance.

“**In developing this strategy, local planning authorities should take into account:**

- the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
- the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;
- the desirability of new development making a positive contribution to local character and distinctiveness; and
- opportunities to draw on the contribution made by the historic environment to the character of a place”

14. To conserve and enhance heritage assets the Councils must first identify their historical or architectural significance. Policy relating to development proposals that may affect heritage assets,
including their settings, must support decisions that balance the benefits of proposals for development against the significance of the asset involved.

15. When considering the impact of proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation. The more important the asset, the greater the weight should be applied (paragraph 132). This does not prevent development that may, or may not, impact on the heritage assets but it ensures that the significance of that asset is recognised and that any decision is weighed appropriately.

16. When considering the significance of elements of the historic environment, the Councils should recognise the distinction between substantial harm and less than substantial harm;

17. Where a proposed development will lead to **substantial harm** to or **total loss of** significance of a designated heritage asset, the Councils should refuse consent unless it can be demonstrated that the substantial harm or loss is necessary in order to achieve significant public benefits that outweigh that harm or loss, or all of the following apply:
   - The nature of the heritage asset prevents all reasonable uses of the site; and
   - No viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and
   - Conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible; and
   - The harm or loss is outweighed by the benefit of bringing the site back into use.

18. Where a development proposal will lead to **less than substantial harm** to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.

19. The NPPF sets out National Planning Policy in terms of the retaining, restoring and re-using heritage assets and protecting the historic environment from harm. The Councils are responsible for seeking, through their Local Plan, to protect the historic environment, but also to ensure that the delivery of development is not at the expense of harm to their historic environment and the positive contribution that it can make to local character and distinctiveness.

20. This HIA should be used as evidence to support the site allocations process as well as being a valuable tool for use during detailed consideration of planning applications.

**Historic England requirements**

21. Historic England states that site allocations within the Local Plan ‘establishes locations for types of development within the authority’s administrative area. A positive strategy for the historic environment in Local Plans can ensure that site allocations avoid harming the significance of both designated and non-designated heritage assets, including effects on their setting.' It is through a pro-active approach to such a process that new opportunities relating to the historic environment can be identified, for example through tackling heritage at risk by identifying new and viable uses for listed buildings and scheduled monument, and through new development providing a high quality setting for heritage assets.

22. This evidence research has drawn upon the advice provided in Historic England’s *The Historic Environment in Local Plans (GPA 1)* and *The Historic Environment and Site Allocations in Local Plans (AN 3)*, in order to understand the significance of heritage assets within and in the proximity of the site allocations within the Joint Local Plan area, both known and potential in order to future proof the

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3 Historic England (2015) *The Historic Environment and Site Allocations in Local Plans*
plan. This will provide officers and developers with a better understanding of the potential of relevant sites, which may contain or impact upon the setting of heritage assets.

**Key Evidence Sources**

23. As part of the evidence to inform the Joint Local Plan, the Plymouth City Council and Devon County Council Historic Environment Records provided much of the information for each of the areas considered.

24. Information and evidence has also been taken from previous plans and policies, including
   b. Site Allocation DPDs in South Hams (Dartmouth, Ivybridge, Kingsbridge, Totnes and Rural Areas 200)
   c. Masterplan SPDs in West Devon (Okehampton and Tavistock 2012)
   d. Conservation Area Appraisals and Management Plans
   e. The National Heritage List for England
   f. Characterisation Studies (Plymouth City Council)

**Methodology**

25. All of the proposed sites for allocation in the JLP have been subject to an assessment in accordance with the suggested approach in *The Historic Environment and Site Allocations in Local Plans (AN 3)*. The key stages of the assessment are:

   a. **STEP 1: Identify which heritage assets are affected by the potential site allocation**
      • Informed by the evidence base, local heritage expertise, and where needed, site surveys
   b. **STEP 2: Understand what contribution to the site (in its current form) makes to the significance of the heritage assets(s), including:**
      • Understanding the significance of heritage assets, in a proportionate manner, including contribution made by its setting considering its physical surroundings, the experience of the asset and its associations (e.g. cultural or intellectual)
      • Understanding of the relationship of the site to the heritage asset, which is not solely determined by distance or inter-visibility (for example, the impact of noise, dust or vibration)
      • Recognising that additional assessment may be required due to the nature of the heritage assets and the lack of existing information
      • For a number of assets, it may be that a site makes very little or no contribution to the significance.
   c. **STEP 3: Identify what impact the allocation may have on that significance including:**
      • Location and siting of development, e.g. proximity, extent, position, topography, relationship, understanding, key views
      • Form and appearance of development e.g. prominence, scale, massing, materials, movement
      • Other effects of development e.g. noise, odour, vibration, lighting, changes to general character, access and use, landscape, context, permanence, cumulative impact, ownership, viability, communal use
• Secondary effects, e.g. increased traffic movement through historic town centres as a result of new development
d. **STEP 4: Consider maximising enhancements and avoiding harm through:**

  **Maximising enhancement**
  • Public access and interpretation
  • Increasing understanding through research and recording
  • Repair/regeneration of heritage assets
  • Removal from the Heritage at Risk Register
  • Better revealing of significance of assets e.g. through introduction of new viewpoints and access routes, use of appropriate materials, public realm improvements, shop front design

  **Avoiding harm**
  • Identifying reasonable alternative sites
  • Amendments to site boundary, quantum of development and types of development
  • Relocating development within the site
  • Identifying design requirements including open space, landscaping, protection of key views, density, layout and heights of buildings
  • Addressing infrastructure issues such as traffic management

e. **STEP 5: Determine whether the proposed allocation is appropriate in light of the NPPF’s test of soundness**

  • Positively prepared in terms of meeting objectively assessed development and infrastructure needs where it is reasonable to do so, and consistent with achieving sustainable development (including the conservation of the historic environment)
  • Justified in terms of any impacts on heritage assets, when considered against reasonable alternative sites and based on proportionate evidence
  • Effective in terms of deliverability, so that enhancement is maximised and harm minimised
  • Consistent with national policy in the NPPF, including the need to conserve heritage assets in a manner appropriate to their significance

**Summary of Assessment Outcomes**

26. Each of the site assessments for the proposed site allocations can be viewed at Appendix A (Plymouth Policy Area) and Appendix B (Thriving Towns and Villages Policy Area). Mitigation measures have been identified for inclusion within the site allocation policies.

27. The assessments describe how development is likely to impact on heritage significance for each site and makes recommendations for avoiding and/or mitigating the impact. This is likely to involve careful, thoughtful design and consideration of context. In no case has the proposed development been assessed to have substantial harm to a heritage asset that would result in its allocation being unacceptable and no sites have been deleted as a result of the HIA process. In all cases, even those in the most sensitive locations, it is considered that it is likely to be possible to mitigate the harm to heritage assets through detailed consideration of the quantum and form of development together with sensitive design and use of materials whilst reflecting the historic character of the area.
Site Selection Methodology:
Step 1: Are any heritage assets affected by the potential site allocation?
There are no designated heritage assets within the site itself, but the Grade II listed post-war Pannier Market stands to the north east of the site. This section of the city centre was realised as part of Abercrombie and Paton Watson’s 1943 Plan for Plymouth, and its subsequent revision in 1952. As a result, the layout would be considered as a non-designated heritage asset in terms of providing a positive contribution to the local character and distinctiveness of the city centre. The Art Deco Colin Campbell House, which survived the post-war re-development of the area, and a number of other high quality buildings (as shown on the map above), are considered as non-designated heritage assets.

The area itself was originally developed during the early 18th century, but is currently used as a car park, and has remained as such since its redevelopment during the 1950s/60s. There is high archaeological potential within this area, therefore, any proposed below ground work would require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.
Step 2: **What contribution does the site make to the significance of the heritage assets?**
The most important contribution that this site makes is to the significance of the Abercrombie and Paton Watson plan in terms of layout. It is evident that the space, as it currently stands, is poorly maintained and unattractive, with the central area providing car parking for local shoppers. The surrounding buildings, including the ‘Easiform’ prefabricated building system facing onto Frankfort Gate to the north of the site, present negative rear elevations overlooking the car parking area, ensuring there is little natural surveillance. Colin Campbell House itself has been poorly maintained over the years and has had a number of unattractive and insensitive additions, which have had a detrimental effect on its outer appearance. However, the site respects, certainly to the east and south, the layout of the 1943 Abercrombie and Paton Watson plan, and to the west follows the agreed alignment along Western Approach, as per the 1952 revision. In particular, this site currently retains the principles of the precincts, zoning and rectilinear geometry of the plan. The Pannier Market, which is symmetrical to Cornwall Street and New George Street and aligned to the townscape space within Frankfort Gate, reflects the Beaux-Arts style as applied to all the major streets in the 1943 and 1952 plans. As a result, it provided that element of order and planning missing from the previous organic development of the city centre during the Georgian, Regency and Victorian periods. In the grid plan, the corner buildings were important in that they established the scale of the adjacent streets. Because the layout of the Abercrombie and Paton Watson plan has remained relatively unscathed, the site, which is part of that overall layout, is of significance.

Step 3: **What impact will the site allocation have on that significance?**
Any proposal that significantly alters the broad layout of buildings on the site could potentially cause harm to the non-designated layout of this part of the Abercrombie and Paton Watson plan. Careful consideration will need to be made to the layout of any new build proposals, in order to avoid harm to the asset. This includes the positioning of any new ‘landmark’ buildings. All heritage assets are irreplaceable, and thus any harm or loss to those non-designated assets including Colin Campbell Court and the broad plan layout will require clear and convincing justification.

Step 4: **What can be done in mitigation to maximise enhancements and avoid harm?**
Any work carried out to this area must have a positive impact on the remaining heritage assets, including the broad layout of Abercrombie and Paton Watson’s *Plan for Plymouth*. If Colin Campbell Court is to be retained then it must be repaired and regenerated appropriately. This should also include its setting, so that its significance can be better revealed. If the proposal is to demolish it and justification for this can be demonstrated, then the new development must be one of higher quality to that existing. Since currently the area is an unattractive and negative space within the city centre, replacing existing buildings of poor quality with high quality new buildings and public realm would be desirable but this should be done in a sensitive way, recognising the heritage assets.

Step 5: **Is the proposed site allocation appropriate in light of the NPPF’s tests of soundness?**
By developing a positive strategy for this site, there is an opportunity to retain and enhance the significance of the heritage assets within both the site itself and abounding it. It is likely that this will enable them to be put to viable uses as part of a wider development proposal. The site currently represents a negative space, which remains underused as a result. By identifying the area with the potential for development and making specific reference in the policy to the desired retention of the heritage assets including the grid layout (bullet 5) and Colin Campbell House (bullet 6) a new positive strategy is identified that will enhance this underused resource. The plan should be deliverable over the period of the Plan and would enable the delivery of sustainable development in accordance with the policies of both the NPPF (points 126, 129, 131-135, 137, 139, 141) and the Local Plan.
Site reference: PLY8

**Site:** Royal Parade, east of Armada Way and Old Town Street

**Allocation:** Retail-led mixed use (opportunities for refurbishment and extension)

**NGR:** SX 47867 54529

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**Site Selection Methodology:**

**Step 1: Are any heritage assets affected by the potential site allocation?**

Although there are no listed buildings within the site itself, there are a number of listed buildings in the vicinity, which include the Grade I St Andrews Church and the Grade II Guildhall to the south, the Royal Bank of Scotland building to the south east and the Grade II Civic Centre and Council House to the south west. The site also stands opposite the Barbican conservation area and the Grade II Civic Registered Park. There are also a number of non-designated heritage assets within the site itself. These represent some of the first buildings to have been built in support of Abercrombie and Paton Watson’s 1943 Plan for Plymouth, which were realised prior to the 1952 revision. As a result, the layout would be considered as a non-designated heritage asset in terms of providing a positive contribution to the local character and distinctiveness of the city centre. The House of Fraser building was the first department store in the country to be rebuilt after the War. Although a fire seriously damaged it during the 1980s and its roof redesigned (as a result ensuring that it is not considered worthy of designation), it represents one of the first key buildings within the Abercrombie and Paton Watson plan.

Given that the area was originally developed around the beginning of the 19th century there is high archaeological potential within the site, therefore, any proposed below ground work would require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.
Step 2: **What contribution does the site make to the significance of the heritage asset?**

The most important contribution that this site makes is to the significance of the Abercrombie and Paton Watson plan in terms of layout, height and the materials used. The buildings within it are considered as important heritage assets. They include the line of the buildings sweeping up Old Town Street (to the east of the site) in what Professor Gould hails as ‘one of the most dramatic gestures of the early ’fifties’. The House of Fraser building being ‘more or less symmetrical in form but not in detail to Pearl Assurance’\(^1\), the building that stands opposite it on Armada Way. However, many of the buildings on this site are suffering from poor maintenance.

Step 3: **What impact will the site allocation have on that significance?**

The proposal is to refurbish and update the retail space with potential for extending the buildings in order to create additional floor area for a mix of uses. If this work is carried out sensitively then there will be less than significant harm to the heritage assets, and indeed the appearance of these buildings should be enhanced, particularly where improvement of the public realm is also secured.

Step 4: **What can be done in mitigation to maximise enhancements and avoid harm?**

The most important and dramatic aspect of these buildings can be found on their principal elevations, contributing as they do to the setting of the streetscape as a whole. If any vertical extensions are proposed then regard should be paid to the height of surrounding buildings, including the recently extended 4-5 St Andrews Cross, which stands on the other side of Old Town Street and to the width and significance of adjoining streets. Vertical extensions should only be done if the development relates well in terms of scale, massing, proportions and materials. Repair and regeneration of the heritage assets should be a main aim of the development, improving the existing rooms to create more useable and viable spaces of high quality that will ensure that there is less than substantial harm. It is suggested that additional work should also be carried out to improve the public realm surrounding this whole site, so that a continuity of high quality streetscape is produced, which will improve the setting of the heritage assets.

Step 5: **Is the proposed site allocation appropriate in light of the NPPF’s tests of soundness?**

In terms of sustaining and enhancing the significance of the non-designated heritage assets and putting them to viable uses, the proposed sensitive refurbishment and extension of these buildings is appropriate. The policy makes specific reference to need for recognition of the high heritage value of the buildings in any alterations, provides guidance for vertical extensions (including recommended building heights in accordance with the City Centre Strategic Masterplan), and requires respect for existing building lines and improvements to shop fronts and canopies. This is considered to be the most appropriate strategy for these important heritage assets within the City Centre, that the plan will be deliverable over its period and that it not only ensures the delivery of sustainable development but is also consistent with the conservation of these non-designated heritage assets in line with points 126, 129, 132, 135 and 140 of the NPPF. The retention of the Abercrombie and Paton Watson 1943 layout is to be welcomed.

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\(^1\) Jeremy Gould *Plymouth Planned*
Site Selection Methodology:
Step 1: Are any heritage assets affected by the potential site allocation?
There are no designated heritage assets within the site itself. This site stands within the footprint of the 1943 Abercrombie and Paton Watson Plan for Plymouth and its 1952 revision, so the layout would be considered as a non-designated heritage asset in terms of providing a positive contribution to the local character and distinctiveness of the city centre. It is acknowledged that the buildings at the top end of the City Centre area are not of such high quality as those at the south end; however, any proposed redevelopment must acknowledge the existing layout, in particular respecting existing building lines and maintaining the vista from North Cross to the Hoe along Armada Way.

The area is likely to be of high archaeological potential given that it was heavily developed prior to its inclusion as part of the Abercrombie and Paton Watson plan, therefore any proposed development would require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation. There is a possibility of a remaining air raid shelter under this section of the city centre, and if discovered a full photographic evaluation will be required.

Step 2: What contribution does the site make to the significance of the heritage asset?
The most important contribution that this site makes is to the significance of the Abercrombie and Paton Watson plan in terms of layout.
Step 3: What impact will the site allocation have on that significance?

The impact of the site allocation is very much dependent on what kind of development would be built here. In terms of the demolition of the existing buildings, since the actual buildings, whilst not unpleasant, are not of particularly high quality there is an opportunity to create higher quality development within this site. However, no demolition should occur until the proposed re-development, of higher quality to that which is currently in place is approved, and will proceed after the loss has occurred (as per point 135 of the NPPF). Any new development would need to conform to the actual street layout, and the maintenance of the vista from North Cross to the Hoe is retained.

Step 4: What can be done in mitigation to maximise enhancements and avoid harm?

Any development within this area should improve the frontage to both Armada Way and Mayflower Street (in line with the Plymouth City Centre Strategic Masterplan), which were both key components of the Abercrombie and Paton Watson 1943 Plan for Plymouth and its 1952 revision. Careful consideration will need to be made to the layout of new buildings in order to avoid harm to the asset.

Step 5: Is the proposed site allocation appropriate in light of the NPPF’s tests of soundness?

The retention of the broad layout of the Abercrombie and Paton Watson 1943 plan and the 1952 revision is of importance. The proposal to develop this site with specific reference in the policy to the need to provide high quality building design to the sites prominent street frontages, to recommend building heights in accordance with the City Centre Strategic Masterplan and promote enhance public realm is an appropriate strategy for the site. The allocation is considered deliverable and, if the proposals ensure that no harm comes to the layout of this part of the city centre, will ensure that sustainable development is achieved in accordance with the policies as set out in the NPPF (points 126, 129, 132, 135 and 140), by causing less than substantial harm to the non-designated heritage asset, in this case the layout of the Plan.
Site reference: PLY10

Site: Cornwall Street East

Allocation: Mixed use - retail / housing / parking

NGR: SX 47838 54756

Site Selection Methodology:
Step 1: Are any heritage assets affected by the potential site allocation?
There are no designated heritage assets within the site or in close proximity to it, however this site is part of the Abercrombie and Paton Watson 1943 Plan for Plymouth and its subsequent revision in 1952, so the layout would be considered as a non-designated heritage asset in terms of providing a positive contribution to the local character and distinctiveness of the city centre.

The area is likely to be of high archaeological potential given that it had part of the Mill leat and aqueducts running through it as well as part of the Sugar Refinery, prior to its inclusion in the Abercrombie and Paton Watson proposal for the area, therefore any proposed development would require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.

Step 2: What contribution does the site make to the significance of the heritage asset?
The most important contribution that this site makes is to the significance of the Abercrombie and Paton Watson 1943 Plan for Plymouth and its subsequent 1952 revision in terms of layout.

Step 3: What impact will the site allocation have on that significance?
The impact of the site allocation is very much dependent on what kind of development would be built here. In terms of the demolition of the existing buildings, there would need for robust justification for those facing onto Armada Way, since whilst not of the highest quality, these buildings are considered of good quality and in keeping with the Plan for Plymouth. However, no demolition should occur until the proposed redevelopment, of higher quality to that which exists, is approved and will proceed after the loss has occurred (as per point 135 of the NPPF). Any new development would need to conform to the external street layout and the maintenance of the building lines and vista from North Cross to the Hoe along Armada Way.
Step 4: **What can be done in mitigation to maximise enhancements and avoid harm?**

Any development within this area should improve the frontage to Armada Way, Cornwall Street and Mayflower Street East (in line with the Plymouth City Centre Strategic Masterplan), which were all key components of the Abercrombie and Paton Watson 1943 *Plan for Plymouth* and its 1952 revision. Considering the layout of the city centre as a whole, it is necessary to ensure that the plan layout is not eroded. Careful consideration will need to be made to the layout of new buildings to avoid harm to the asset.

Step 5: **Is the proposed site allocation appropriate in light of the NPPF’s tests of soundness?**

The retention of the layout of the Abercrombie and Paton Watson 1943 plan and the 1952 revision is of importance. The proposal to develop this site with specific reference in the policy to the need to provide high quality building design, to recommend building heights in accordance with the City Centre Strategic Masterplan and promote enhance public realm is an appropriate strategy for the site. The allocation is considered deliverable and, if the proposals ensure that no harm comes to the layout of this part of the city centre, will ensure that sustainable development is achieved in accordance with the policies as set out in the NPPF (points 126, 129, 132, 135 and 140), by causing less than substantial harm to the non-designated heritage asset, in this case the layout of the Plan.
Site Selection Methodology:

Step 1: Are any heritage assets affected by the potential site allocation?
There are no designated heritage assets within the site itself but the block does stand to the north east of the Grade II listed Pannier Market. This site is part of the Abercrombie and Paton Watson 1943 *Plan for Plymouth* and its subsequent 1952 revision, so the layout itself is identified as a non-designated heritage asset in terms of providing a positive contribution to the local character and distinctiveness of the city centre.

The area is likely to be of high archaeological potential given that this area was predominantly developed as housing from at least 1856 and therefore any proposed development would require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.

Step 2: What contribution does the site make to the significance of the heritage asset?
The most important contribution that this site makes is to the significance of the Abercrombie and Paton Watson 1943 *Plan for Plymouth* and its subsequent 1952 revision in terms of layout.

Step 3: What impact will the site allocation have on that significance?
The impact of the site allocation is very much dependent on what kind of development would be built here. In terms of the demolition of the existing buildings, it is considered that there would be no harm since the actual buildings in this part of the city centre are not of particularly good quality. However, no demolition should occur until the proposed re-development, of higher quality to that existing is approved and will proceed after the loss has occurred (as per point 135 of the NPPF). Any new development would need to conform to the external street layout, thus avoiding harm to the non-designated heritage asset, as well as creating a sympathetic relationship with other buildings within the area.
Step 4: **What can be done in mitigation to maximise enhancements and avoid harm?**
Any development should retain the alignment of the buildings with Cornwall Street and Mayflower Street West, which were key streets in the Abercrombie and Paton Watson 1943 *Plan for Plymouth* and its subsequent 1952 revision. Careful consideration will need to be made to the layout of new buildings in order to avoid harm to the asset. It is noted that a re-developed multi-storey car park access via Mayflower Street with pedestrian access directly to street frontage improving the experience of arriving by car and providing convenient parking for the West End is proposed as part of the Plymouth City Centre Strategic Masterplan. It is not considered that this will impact detrimentally on the layout.

Step 5: **Is the proposed site allocation appropriate in light of the NPPF’s tests of soundness?**
The retention of the layout of the Abercrombie and Paton Watson 1943 plan and the 1952 revision is of importance. The proposal to develop this site with specific reference in the policy to the need to provide high quality building design, to recommend building heights in accordance with the City Centre Strategic Masterplan and promote enhance public realm is an appropriate strategy for the site. The allocation is considered deliverable and, if the proposals ensure that no harm comes to the layout of this part of the city centre, will ensure that sustainable development is achieved in accordance with the policies as set out in the NPPF (points 126, 129, 132, 135 and 140), by causing less than substantial harm to the non-designated heritage asset, in this case the layout of the Plan.
Site Selection Methodology:

Step 1: Are any heritage assets affected by the potential site allocation?
There are no designated heritage assets within the site itself but the block stands to the east of the Grade II listed Pannier Market. This site is part of the Abercrombie and Paton Watson 1943 Plan for Plymouth and its subsequent 1952 revision, so the layout itself is identified as a non-designated heritage asset in terms of providing a positive contribution to the local character and distinctiveness of the city centre.

The area is likely to be of high archaeological potential given that it was heavily developed prior to its inclusion as part of the Abercrombie and Paton Watson plan for this area, therefore any proposed below ground development would require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.

Step 2: What contribution does the site make to the significance of the heritage asset?
The most important contribution that this site makes is to the significance of the Abercrombie and Paton Watson 1943 Plan for Plymouth and its subsequent 1952 revision in terms of layout.

Step 3: What impact will the site allocation have on that significance?
The site makes a positive contribution to the existing city centre representing, as it does, a principal part of Abercrombie and Paton Watson's 1943 Plan for Plymouth. The decision to retain and refurbish the existing units is to be welcomed particularly as many of the buildings on this site are suffering from poor maintenance.
Step 4: **What can be done in mitigation to maximise enhancements and avoid harm?**
Repair and regeneration of the non-designated heritage asset, in this case the layout of the original Abercrombie and Paton Watson 1943 *Plan for Plymouth* should be a main aim of the site allocation, improving the existing places to create attractive living spaces of high quality that will ensure that there is less than substantial harm to the existing buildings. It is suggested that additional work should also be carried out to improve the public realm, so that a high quality streetscape is achieved, which will improve the setting of the site.

Step 5: **Is the proposed site allocation appropriate in light of the NPPF’s tests of soundness?**
In terms of retaining and refurbishing this aspect of the non-designated heritage asset and seeking to put the existing buildings to viable uses is consistent with meeting the objectively assessed development and infrastructure requirements. This is considered to be the most appropriate strategy for these buildings within the City Centre, and that the plan will be deliverable over its period and that it not only ensures the delivery of sustainable development but is also consistent with the conservation of this non-designated heritage asset in line with points 126, 129, 132, 135 and 140 of the NPPF. The retention of the Abercrombie and Paton Watson 1943 layout is to be welcomed.
Site reference: PLY14

Site: 19 The Crescent

Allocation: Mixed use opportunity site which could support a range of uses including a range of housing, hotel and enabling student accommodation

NGR: SX 47423 54308

Site Selection Methodology:
Step 1: Are any heritage assets affected by the potential site allocation?
This site is currently in part derelict and in part used as additional car parking for visitors to/workers within the city centre. Whilst there are no listed buildings within the site itself, there are listed buildings to the south including the Grade II* No 1 The Crescent and the Grade II Nos 2-12 The Crescent, Nos 15-19 Athenaeum Street and to the west the Grade II New Continental Hotel. There are also a number of non-statutory heritage assets, identified as buildings of the highest quality within the City Centre. In terms of the Abercrombie Plan, this section of the city centre was realised as part of the 1952 revision of Abercrombie and Paton Watson’s 1943 Plan for Plymouth.

Step 2: What contribution does the site make to the significance of the heritage asset?
Currently the site, being derelict, is unsightly and in need of development, providing a negative backdrop as it does to the attractive Grade II* and Grade II terrace, The Crescent, facing it from the south. The vast majority of the site is derelict, including a partially demolished wall and derelict buildings along the south and east boundary of the site. This area is currently unsightly and has a detrimental impact on the heritage assets overlooking the site.

Step 3: What impact will the site allocation have on that significance?
Any development on this site will have an impact on the surrounding heritage assets, and therefore it is important that due consideration is made to creating something that will be sympathetic to those adjacent listed buildings and non-designated heritage assets. The site allocation suggests a large development, both in terms of height and density, which could cause significant harm to the Georgian listed Crescent opposite.
Step 4: **What can be done in mitigation to maximise enhancements and avoid harm?**

It is important that a well-conceived and well-designed development is installed here, sympathetic to the listed buildings nearby and adjacent non-designated heritage assets, and taking into consideration the materials used, height, building alignment and layout and use of the site in order that the development will not have a detrimental impact on the adjacent heritage assets. It is welcomed that the Plymouth City Centre Strategic Masterplan proposes that the streets, spaces and settings of the buildings of higher quality in the area will be improved because of this development.

An archaeological trench evaluation will be an essential requirement prior to any proposed development in order to determine the presence or otherwise of burials associated with the Royal Naval Hospital cemetery or other such remains as may survive. Note that in the event of burials of the RNH cemetery being present, these will require removal under burial licence conditions by a qualified archaeological contractor with a further commitment for research and publication of findings. The RNH cemetery Plymouth is one of only two Royal Naval Hospital cemeteries of the period of Trafalgar which have survived with intact burials (the other being Haslar, Portsmouth).

Step 5: **Is the proposed site allocation appropriate in light of the NPPF’s tests of soundness?**

The proposed site allocation is considered appropriate, in that as well as presuming in favour of sustainable development, it will also ensure that the site, which currently has a detrimental effect on the area is developed into a flourishing and dynamic aspect of the city centre. However, it is important that the new development relates well to what is already in situ, both in terms of heritage assets and new build and is in line with points 126, 129, 132, 135 and 140 of the NPPF. The policy makes specific reference to the need to respond appropriately to the local context, including the Listed Crescent, and seeks to site taller buildings where they have the least detrimental impact. The policy also promotes improved public realm.
Site reference: PLY15

Site: Civic Centre

Allocation: Mixed use refurbishment of Civic Centre building and erection of new building on car park site. The site is suitable for a range of uses including most particularly residential, offices, restaurant, leisure and civic functions, as well as retail space commensurate with its edge of centre location.

NGR: SX 47682 54362

Site Selection Methodology:

Step 1: Are any heritage assets affected by the potential site allocation?

There are a number of designated heritage assets within the site itself including the Grade II listed Civic Centre and Council House and the Grade II Civic Square Registered Park. There are also a number of designated heritage assets close-by including the Grade II Bank Public House and Derry’s Clock to the west and the Grade II 1-4 Lockyer Street terrace to the south. The site also stands between the Hoe Conservation Area to the south and the Barbican Conservation Area to the east.

There are a number of non-designated heritage assets surrounding the site, which are predominantly post-war buildings, built as part of the Abercrombie and Paton Watson 1943 Plan and its subsequent 1952 revision; the Theatre Royal, which was built between 1979 and 1982, is also considered as high quality and therefore providing a positive contribution to the local character and distinctiveness of the city centre.

There is some known archaeology within the area, including two burial sites, one under the Civic Square Registered Park, possibly extending under the Civic Centre and Council House and another burial site to the south of the Athenaeum Theatre. As a result it is considered that there is high archaeological potential in this area.
Step 2: What contribution does the site make to the significance of the heritage assets?

The site includes the Civic Centre and Council House and the proposal is to refurbish the Civic Centre building, which is currently standing empty and is in a poor state of repair. This building is currently one of the tallest within the city centre and as such is considered to be a landmark building. The site also includes the car park to the west of the Civic Centre and Council House, and its contribution to the significance of the Civic Centre and Council House is by providing a vista across which the listed buildings, specifically the Civic Centre, the Council House, Derry’s Clock and the Bank can be viewed from Royal Parade, thus enhancing their setting. However, taken on its own merits, the car park is not an attractive part of the streetscape and in some respects could be considered as a negative space, creating an unattractive frontage onto the pleasant tree-lined Royal Parade.

Step 3: What impact will the site allocation have on that significance?

The proposal will, in part, make a positive contribution to the city centre, ensuring that the Civic Centre and Council House are brought back to a high quality standard. However, the proposal to erect a new building on the car park site to the west of the Civic Centre and Council House would inevitably impact on the setting of all the listed buildings surrounding it including the Civic Centre, the Council House, Derry’s Clock and the Bank Public House and certainly in the case of the Bank and Derry’s Clock, any building could impact negatively on their setting as viewed from Royal Parade.

Step 4: What can be done in mitigation to maximise enhancements and avoid harm?

In terms of the heritage assets and the impact of building in the car park to the west of the Civic Centre and Council House, any building would need to be of a high quality to ensure that its presence would not influence detrimentally on the surrounding heritage assets including those buildings identified as being of the highest quality build. Close attention would need to be paid to height, positioning, design and the materials used for any new building, including the amount of public space set around any proposed new development. If these aspects are carefully considered, the resulting building is likely to contribute to the streetscape of the Royal Parade. Clearly, any building in the car park will have an impact on the Bank and Derry’s Cross in terms of the setting from the Royal Parade angle. There has been substantial work carried out to the public space around the Theatre Royal, Derry’s Clock and the front aspect of the Bank building, and it would be important to ensure that any additional public space around any proposed new development ties in effectively with this existing public space, establishing a continuity of design in terms of quality and material that would ensure that the flow-through from Royal Parade to the Bank and Derry’s Cross would be enhanced. If positioned correctly, there could be some dramatic viewpoints established whereby the two designated heritage assets to the west are visible from Royal Parade.

In terms of the archaeological resource, it would be vital to have a full archaeological assessment, inclusive of trench evaluation, provided within any Environmental Impact Assessment report in order to have a greater understanding of what may still remain below ground in this particular area of the City Centre. Such archaeological assessment and evaluation would assist in identifying the appropriate levels of mitigation to be put in place should development proceed. Note that in the event of burials, these will require removal under burial licence conditions by a qualified archaeological contractor with a further commitment for research and publication of findings.
Step 5: Is the proposed site allocation appropriate in light of the NPPF’s tests of soundness?
In terms of sustaining and enhancing the significance of the heritage asset and putting it to viable uses, the proposed sensitive restoration of the Civic Centre will ensure that the asset is improved and that the building will become a desirable property within the city centre, likely to provide viable mixed use accommodation, consistent with its conservation. This is in line with points 126, 128-136 and 140 of the NPPF.

The proposed new building should enhance this key street within the city centre as long as its design, both in terms of the building itself and the public space surrounding it relates well to the existing buildings and public space already established within the streetscape in accordance with point 129 of the NPPF. Close attention should be made to the positioning, height, design and materials of any proposed new build, to ensure that it will make a positive contribution to the area, creating a more attractive contribution compared to the current car park. The proposal to ensure that the area becomes dedicated to mixed use will guarantee a positive impact on the wider social, cultural, economic and environmental aspects of the city centre, and will also make sure that the remaining historic environment will make a contribution in terms of enhancing the space and creating an attractive ‘place’ in line with point 126 of the NPPF.
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<th>Site  ref</th>
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<tr>
<td>PLY16</td>
<td>Plymouth Railway Station and Intercity House and land adjacent (SX 47704 55272)</td>
<td>Mixed use development, to transform the railway station and surrounding land into a high quality gateway to the city. Uses to include radical improvements to the station's facilities (including complementary retail), university educational facilities, student accommodation, offices and residential.</td>
<td>There are no designated or non-designated heritage assets within the site, however, the Grade II listed Portland Villas stand within the University campus to the south. In 1856, the Stonehouse leat ran across the full site, with the South Devon railway along its northern boundary. By 1892, the North Road Station had been built, with associated tracks lying across the full site, and this layout remained until post-war when the current layout was established. There is no known archaeology in the area, however, any proposed development would require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.</td>
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Site Selection Methodology:

Step 1: Are any heritage assets affected by the potential site allocation?
There are a number of designated buildings within the University campus, which are all under the care/maintenance of the University. These include the Grade II Portland Villas (including a number of TPOs within this street), the Grade II Reservoir and associated structures, and the Grade II* Sherford Church and associated structures. There are also a number of non-designated buildings including the Coburg building and Reynolds building, both of which face onto Coburg Street, and 23 Endsleigh Place, 26-24 Endsleigh Place, 1 Kirkby Place, 12 Kirkby Place and 83-87 North Road East. In terms of PCAD there are the Grade II listed Museum and St Luke’s Church in close proximity to the site and the undesignated 2-14 Drake Circus. This area was developed during the early part of the 19th century.

There is no known archaeology, however, any proposed development would require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.

Step 2: What contribution does the site make to the significance of the heritage assets?
The site includes the University campus, the area to the south of the Plymouth Museum and the Plymouth College of Art campus. Since the 1960s, the University campus has been developed in an ad-hoc fashion, with little or no coherent or holistic sense as to how the new developments related to existing buildings. This has subsequently caused substantial harm to many of the remaining heritage assets. However, since 2000, the University’s Strategic Campus Masterplan has ensured that new buildings do relate to the existing layout of the campus. It is noted, too, that the redevelopment works to the Plymouth College of Art has included an attractive refurbishment of the public realm to the front of the renovated principal elevation of PCAD.
Step 3: What impact will the site allocation have on that significance?
It is difficult to know what the impact of the site allocation will have on the significance of the heritage assets, since it is couched in such generic terms, however, if new buildings relate to the masterplans prepared by Plymouth University and PCAD respectively, development will be more coherent with attractive spaces that respect the heritage assets.

Step 4: What can be done in mitigation to maximise enhancements and avoid harm?
For any proposed new development, careful consideration will need to be made to the quality of design, height, positioning, massing and use of materials in order to avoid harm to the local designated and non-designated heritage assets.

Step 5: Is the proposed site allocation appropriate in light of the NPPF’s tests of soundness?
This is, by necessity, a generic allocation. If the terms of mitigation are approved, then it is likely to have a more positive impact on how the campuses develop over time, and will ensure that the impact on the heritage assets become less than significant in terms of harm. It will ensure that sustainable development is achieved, whilst not to the detriment of the remaining heritage assets and will enable the evolving site to be deliverable whilst remaining in line with points 126, 128-136 and 140 of the NPPF and the Local Plan policies.
Site Selection Methodology:

Step 1: **Are any heritage assets affected by the potential site allocation?**

This site is currently in the process of being developed and the historic environment officers have provided consultation responses to the proposals to ensure that the significance of the heritage assets have been recognised. The site includes the Grade II listed City Museum and Church of St Luke’s, and the two terraced houses to the north of St Luke’s that were part of the terracing on Tavistock Place and remain a key feature of this site and as such are identified as non-designated heritage assets. The site is also surrounded by a number of attractive terraces, all of which contribute to the character of the place and are considered as non-designated heritage assets.

There is no known archaeology, with the area appearing as agricultural prior to the current housing being developed on the site however, any proposed development would require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.

Step 2: **What contribution does the site make to the significance of the heritage asset?**

Currently, the site remains unchanged in terms of layout since the Museum was built at the beginning of the 20th century. However, because of lack of maintenance the Church and the two terraced houses to the north of the church have been allowed to fall into a poor state of disrepair. The two terraced houses to the south of the church have been substantially altered through insensitive alterations that do not relate well to their original proportions.
Step 3: What impact will the site allocation have on that significance?
Whilst the proposed works to the Museum will cause some harm to the rear of the building, overall the demolition involves the removal of part of the later extension. In terms of the work to be carried out to the Church of St Luke’s which has been poorly maintained for many decades, the proposal, which seeks to refurbish the building, with great care to its restoration will have a positive impact on the building. The proposal is to demolish the two terraced cottages to the south. The development of student flats in their stead could have a detrimental impact if these buildings are not designed to be sympathetic to their juxtaposition with the historic church and therefore great care will be required for their design in terms of positioning, mass, height and materials used.

Step 4: What can be done in mitigation to maximise enhancements and avoid harm?
A balanced judgement has been made on the harm/substantial harm of the listed Museum and the two non-designated terraced cottages to the north of the church respectively. The proposal is to develop this area into a History Centre, retaining and sensitively restoring the principal elevation and the more positive aspects of the City Museum and the Church of St Luke’s, whilst recognising that this will result in the loss of part of the rear of the Museum and the two cottages. It is considered that clear and convincing justification for this harm has been provided.

In terms of the development of student flats in place of the two terraced cottages, however, it is important that any proposed development here should match the historic layout of the street, and should stand no closer to the church than the existing buildings; and due consideration should be paid to the positioning, height, design, massing and materials used to ensure that there is less than significant harm to the setting of the church. It is also important that the public realm around this building matches that surrounding the church and the rear of the Museum building.

Step 5: Is the proposed site allocation appropriate in light of the NPPF’s tests of soundness?
In terms of sustaining and enhancing the significance of the designated heritage assets and putting them to viable uses, the proposed sensitive refurbishment and extension of these buildings is consistent with meeting the objectively assessed development and infrastructure requirements. This is considered to be the most appropriate strategy for these important heritage assets, and whilst the loss of the non-designated heritage assets on this site are regrettable, as long as the design of the new flats follow the mitigation proposals above then substantial harm to the setting of the church will be avoided. It is considered that the plan will be deliverable over its period and that it not only ensures the method of sustainable development is achievable but is also consistent with the conservation of the designated heritage assets in line with points 126, 128-136 and 140 of the NPPF and the Local Plan policies.
Site reference: PLY23

Site: Plymouth Fruit Sales, Sutton Road

Allocation: Mixed use - housing / offices / commercial / leisure

NGR: SX 48540 54468

Site Selection Methodology:

Step 1: Are any heritage assets affected by the potential site allocation?
Although there are no designated or non-designated heritage assets within the site itself, there is the Grade II listed China House standing approximately 87m to the west. The Barbican conservation area is on the opposite side of Sutton Harbour, and this area contains numerous listed buildings and the scheduled Citadel overlooks the site from the south west. The site was, by the 1890s, occupied by the Plymouth Saw and Planing mills and the Sutton Road Cement Works.

There is no known archaeology however given the area’s evolution since medieval times, it has high archaeological potential, therefore any proposed development would require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.

Step 2: What contribution does the site make to the significance of the heritage asset?
The site is overlooked by a number of designated and non-designated heritage assets. The site has been left undeveloped following the demolition of a number of low quality warehouses in the mid-90s, to make way for the Lockyer Tavern and the Premier Inn developments to the north and south of the site.
Step 3: **What impact will the site allocation have on that significance?**

This is a brownfield site that has been left undeveloped for several decades. If it is to be developed, then its development must ensure that it does not cause significant harm to the setting of the surrounding designated and non-designated heritage assets. There have been a number of new buildings built recently in this area of Sutton Harbour, which are subject to a variety of mixed uses including to the west, the University of Plymouth’s Graduate School of Management, which stands 3-5 storeys in height, and to the north a 10-storey residential block of flats. By using a variety of different materials, many of which reflect the traditional materials of the area including natural stone, wood and metal, the impact of these developments, and the distance that they stand across the water from the Barbican conservation area ensure that they do not cause significant harm to the setting of the heritage assets. In particular, work has been carried out to improve the public realm around these buildings and improve the Sutton Harbour Heritage trail so that an attractive walk has been developed around the Harbour, providing viewing areas allowing an uninhibited view from the east side of the Harbour into the conservation area opposite.

Step 4: **What can be done in mitigation to maximise enhancements and avoid harm?**

It is vital that a well-conceived and well-designed development is built here, sympathetic to the designated and non-designated heritage assets nearby. Careful consideration will need to be made to the quality of design, height, positioning, massing and use of materials in order to avoid harm to the asset.

Step 5: **Is the proposed site allocation appropriate in light of the NPPF’s tests of soundness?**

This is considered to be a positively prepared plan and the most appropriate strategy in ensuring sustainable development whilst creating less than substantial harm to the nearby designated and non-designated heritage assets. It is considered that the plan will be deliverable over its period and that it not only ensures the method of sustainable development is achievable but is also consistent with the conservation of the designated and non-designated heritage assets in the area in terms of setting and is in line with points 126, 128-136 and 140 of the NPPF and the Local Plan policies.
Site Selection Methodology:

Step 1: **Are any heritage assets affected by the potential site allocation?**
Although there are no heritage assets within the site itself, there is the Grade II listed China House standing approximately 124m to the south, Mayflower House (Grade II) standing approximately 126m to the west and the Church of St John the Evangelist (Grade II) standing 132m to the east. The Barbican conservation area stands to the west, south west and this area contains numerous listed buildings and Ebrington Street conservation area stands to the north. There is an attractive old Church hall building standing at the north east corner of Harbour Avenue, which has been identified as a non-designated heritage asset, albeit there has been an extension added to its east elevation more recently. The site was, by the 1890s, occupied by the Store Dressing Yard and the Brunswick Building Yard.

There is no known archaeology however given the area’s evolution since medieval times, it has high archaeological potential, therefore any proposed development would require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.

Step 2: **What contribution does the site make to the significance of the heritage asset?**
The site is overlooked by a number of designated and non-designated heritage assets. The north east of the site is currently occupied by a number of single storey light industrial buildings, with the contemporary Foot Anstey at the north side of the site, and the Pinnacle building on the west corner where North Quay turns onto Harbour Avenue.
Step 3: **What impact will the site allocation have on that significance?**
This is a brownfield site that has evolved according to requirements. If it is to be further developed, then its development must ensure that it does not cause significant harm to the setting of the surrounding designated and non-designated heritage assets. There have been a number of new buildings built recently in this area of Sutton Harbour, which are subject to a variety of mixed uses. By using a variety of different materials, many of which reflect the traditional materials of the area including natural stone, wood and metal, the impact of these developments, and the distance that they stand across the water from the Barbican conservation area ensure that they do not cause significant harm to the setting of the heritage assets. In particular, work has been carried out to improve the public realm around these buildings and improve the Sutton Harbour Heritage trail so that an attractive walk has been developed around the Harbour, providing viewing areas allowing an uninhibited view from the east side of the Harbour into the conservation area opposite.

Step 4: **What can be done in mitigation to maximise enhancements and avoid harm?**
It is vital that a well-conceived and well-designed development is built here, sympathetic to the designated and non-designated heritage assets nearby. Careful consideration will need to be made to the quality of design, height, positioning, massing and use of materials in order to avoid harm to the asset.

Step 5: **Is the proposed site allocation appropriate in light of the NPPF’s tests of soundness?**
This is considered to be a positively prepared plan and the most appropriate strategy in ensuring sustainable development whilst creating less than substantial harm to the nearby designated and non-designated heritage assets. It is considered that the plan will be deliverable over its period and that it not only ensures the method of sustainable development is achievable but is also consistent with the conservation of the designated and non-designated heritage assets in the area in terms of setting and is in line with points 126, 128-136 and 140 of the NPPF and the Local Plan policies.
Site reference: PLY25

Site: Sugar House, Sutton Harbour

Allocation: Mixed use (residential, offices and active ground floor uses)

NGR: SX 48566 54358

Site Selection Methodology:

Step 1: Are any heritage assets affected by the potential site allocation?
Although there are no designated or non-designated heritage assets within the site itself, the Barbican conservation area, which contains a large number of designated and non-designated heritage assets, lies to the west of the site, with the scheduled Citadel beyond. The Grade II China House Public House stands to the south west.

In terms of the archaeology, an open area excavation was carried out throughout this site in 2008, prior to its becoming a car park. A significant find was discovered indicating the layout of the Sugar House, with boundary walls, cobbled streets, and stone floors uncovered. These non-designated heritage assets were left in situ under the car park.

Step 2: What contribution does the site make to the significance of the heritage asset?
The site is overlooked by a number of designated and non-designated heritage assets. The site is currently brownfield following the demolition of a number of low quality warehouses in 2007/08, to make way for a new development to the north and a small car park to the south east, but with a large portion of the site left undeveloped. The site allocation is related specifically to this and the car park area.
Step 3: **What impact will the site allocation have on that significance?**
This is a brownfield site that has been left undeveloped for a few years. If it is to be developed, then its development must ensure that it does not cause significant harm to the setting of the surrounding designated and non-designated heritage assets. There have been a number of new developments built recently on either side of this site, which are subject to a variety of mixed uses including to the south, a 10-storey (at its highest point) residential block of flats and to the north, a 9-storey office block, with restaurants/commercial units to the ground floor. By using a variety of different materials, many of which reflect the traditional materials of the area including natural stone, wood and metal, the impact of these developments, and the distance that they stand across the water from the Barbican conservation area ensure that they do not cause significant harm to the setting of the heritage assets. In particular, work has been carried out to improve the public realm around these buildings and improve the Sutton Harbour Heritage trail so that an attractive walk has been developed around the Harbour, providing viewing platforms providing uninhibited views from the east side of the Harbour into the conservation area opposite.

Step 4: **What can be done in mitigation to maximise enhancements and avoid harm?**
It is vital that a well-conceived and well-designed development is erected here, sympathetic to the designated and non-designated heritage assets nearby. Careful consideration will need to be made to the quality of design, height, positioning, massing and use of materials in order to avoid harm to the asset.

Step 5: **Is the proposed site allocation appropriate in light of the NPPF’s tests of soundness?**
This is considered to be a positively prepared plan and the most appropriate strategy in ensuring sustainable development whilst creating less than substantial harm to the nearby designated and non-designated heritage assets. It is considered that the plan will be deliverable over its period and that it not only ensures the method of sustainable development is achievable but is also consistent with the conservation of the designated and non-designated heritage assets in the area in terms of setting and is in line with points 126, 128-136 and 140 of the NPPF and the Local Plan policies.
Site reference: PLY26

Site: Sutton Harbour Fish Quay

Allocation: This site is considered for Fish Market improvements (exploring opportunities for complementary leisure use)

NGR: SX 48550 54087

Site Selection Methodology:

Step 1: Are any heritage assets affected by the potential site allocation?
There are no designated or non-designated heritage assets within the site itself, however there are a number of heritage assets within the proximity of this site including The Barbican conservation area, which stands to the north and west and which contains a large number of heritage assets including a scheduled ancient monument and numerous listed buildings. To the west/south west the scheduled Citadel overlooks the site. There is also a number of Grade II listed buildings to the east of the site.

There is no known archaeology however given the area’s evolution since medieval times, it has high archaeological potential, therefore any proposed below ground development would require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.

Step 2: What contribution does the site make to the significance of the heritage asset?
Currently the buildings occupying the site are single storey and industrial in design. Their impact on the heritage assets cause less than significant harm however, they do not contribute to those assets in terms of their setting.
Step 3: **What impact will the site allocation have on that significance?**
The continued use of this site as a fish market should not have any detrimental impact on the surrounding heritage assets. However, if the site is to be developed to improve its economic contribution to the area, then its development must ensure that it does not cause significant harm to the setting of the surrounding designated and non-designated heritage assets. There have been a number of new developments recently built on this side of Sutton Harbour, which are subject to a variety of mixed uses including to the north, the University of Plymouth's Graduate School of Management, which stands 3-5 storeys in height, and further to the north a 10-storey (at its highest point) residential block of flats. By using a variety of different materials, many of which reflect the traditional materials of the area including natural stone, wood and metal, the impact of these developments ensure that they do not cause significant harm to the setting of the heritage assets. In particular, work has been carried out to improve the public realm around these buildings and improve the Sutton Harbour Heritage trail so that an attractive walk has been developed around the Harbour, providing viewing platforms providing uninhibited views from the east side of the Harbour into the conservation area opposite.

Step 4: **What can be done in mitigation to maximise enhancements and avoid harm?**
It is vital that a well-conceived and well-designed development is built on this site, which is sympathetic to the designated and non-designated heritage assets nearby. Careful consideration will need to be made to the quality of design, height, positioning, massing and use of materials in order to avoid harm to the asset.

Step 5: **Is the proposed site allocation appropriate in light of the NPPF’s tests of soundness?**
This is considered to be a positively prepared plan and the most appropriate strategy in ensuring sustainable development whilst retaining less than substantial harm to the nearby designated and non-designated heritage assets. It is considered that the plan will be deliverable over its period and that it not only ensures the method of sustainable development is achievable but is also consistent with the conservation of the designated and non-designated heritage assets in the area in terms of setting and is in line with points 126, 128-136 and 140 of the NPPF and the Local Plan policies.
Site Selection Methodology:

**Step 1: Are any heritage assets affected by the potential site allocation?**
There are no designated or non-designated structures within the site, however this area stands within the Hoe conservation area and abuts the Hoe Registered Park and Garden. On Lockyer Street, to the north of the site stands a number of Grade I listed villas, and to the south of the site there is the 1923 Plymouth war memorial and to the south west further designated buildings. The area was developed as Windsor Terrace during the Georgian period, but these buildings were destroyed during the Blitz.

There is a high archaeological potential within this area and thus although there is no known archaeology any proposed development would require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.

**Step 2: What contribution does the site make to the significance of the heritage asset?**
The current building, which is a single storey 1970s building in red brick, has a negative impact on the street scene, because of its lack of compatibility with the surrounding designated structures. However, it has a number of trees within its surrounding garden space, which provide a modest buffer between it and the street scene thus there is currently less than substantial harm on the listed structures.

**Step 3: What impact will the site allocation have on that significance?**
The site allocation is for mixed-use redevelopment including hotel and housing. This could have substantial harm on the setting of the surrounding listed buildings, the war memorial opposite it, the neighbouring Registered Park, and the conservation area if any redevelopment is not of the highest standards or design and architecture with car parking appropriately accommodated and screened from the streets. However, the policy requires development to be of high architectural quality and to respond positively to the Hoe Conservation Areas historic character with active ground floor frontages to public streets and enhanced public realm.
Step 4: **What can be done in mitigation to maximise enhancements and avoid harm?**

It is vital that a well-conceived and well-designed development is built on this site, which in accordance with the policy is of high architectural quality and responds positively to the Hoe Conservation Area and other designated heritage assets nearby. Careful consideration will need to be given to the quality of design, height (referencing the 11-storey Holiday Inn opposite the site), positioning, massing and use of materials in order to avoid harm to the asset.

Step 5: **Is the proposed site allocation appropriate in light of the NPPF’s tests of soundness?**

The existing building has a negative impact on the street scene and proposals to replace the building with something that responds positively to the Hoe Conservation Area and other heritage assets is an appropriate strategy for the site and will ensure that any proposed development is in line with points 126, 128-136 and 140 of the NPPF and the Local Plan policies.
Site Selection Methodology:
Step 1: Are any heritage assets affected by the potential site allocation?
This site is currently being marketed for suitable development opportunities and the historic environment officers will provide appropriate consultation responses to the proposals to ensure that the significance of the heritage assets have been recognised. Although there are no designated or non-designated heritage assets within the site, there are a number of listed buildings to the east of the site and the site abuts the Hoe conservation area and the Hoe Registered Park and Garden. This site was developed between 1856 and 1892, with a series of terraces across the site, which were completed by 1906. These were replaced by the hotel post-war, which was subsequently demolished in 2016. Given its prominence, any new development must be a landmark building, which makes a positive contribution to local character and distinctiveness.

There is no known archaeology, however, any proposed development would require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.

Step 2: What contribution does the site make to the significance of the heritage asset?
This is a brownfield site, which could be considered as one of the key sites in Plymouth, overlooking the Hoe, West Hoe and the Sound and it is in dire need of development, currently providing a negative backdrop to the attractive Grade II* and Grade II terraces and the Grand, which stand close to it to the east. This area needs to be developed as soon as possible.
Step 3: **What impact will the site allocation have on that significance?**

Any development on this site will have an impact on the surrounding heritage assets, and therefore it is important that due consideration is made to creating something that will be sympathetic to those adjacent designated and non-designated heritage assets. The site allocation suggests a large development, both in terms of height and density, which could cause significant harm to the Georgian buildings to the east if the development is not built to a very high standard of design.

Step 4: **What can be done in mitigation to maximise enhancements and avoid harm?**

It is vital that a well-conceived and well-designed development is installed here, sympathetic to the setting of the designated heritage assets nearby. Due consideration should be paid to the positioning, height, design, massing and materials used of any new development to ensure that there is less than significant harm to the setting of the designations nearby. Following the demolition of the derelict and less than attractive Quality Hotel, it is important to take this opportunity to build a structure that will relate well to the designations and will become a key landmark building for this important site on the Hoe.

Step 5: **Is the proposed site allocation appropriate in light of the NPPF’s tests of soundness?**

The proposed site allocation is considered appropriate, in that as well as presuming in favour of sustainable development, it will also ensure that the site, which currently has a detrimental effect on the area is developed into a flourishing and dynamic landmark building on the Hoe, contributing in a positive way to the setting of the designations within the area and becoming a key feature of the Hoe. As a result, it is important that the new development relates well to all the designations and is in line with points 126, 128-136 and 140 of the NPPF and the Local Plan policies.
Site Selection Methodology:

Step 1: Are any heritage assets affected by the potential site allocation?

This site is currently being marketed for suitable development opportunities and the historic environment officers will provide appropriate consultation responses to the proposals to ensure that the significance of the heritage assets have been recognised. Although there are no designated or non-designated heritage assets within the site itself, there are a number of listed buildings surrounding and overlooking the site and the site abuts the Inner Basin wall of Millbay Dock, which is Grade II. The Hoe conservation area and the Hoe Registered Park and Garden are to the east of the site and the Stonehouse Peninsula conservation area stands and overlooks this site from the west. The Union Street conservation area stands to the north. This site, which incorporates part of the Millbay docks accredited with being designed by I.K. Brunel between 1852 and 1856. These were replaced by the hotel post-war, which was subsequently demolished in 2016.

There is no known archaeology, however, any proposed development would require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.

Step 2: What contribution does the site make to the significance of the heritage asset?

This is a brownfield site, which could be considered as one of the key sites in Plymouth, overlooking Millbay harbour. Although part of the site has been developed, the rest lies as brownfield, with most of the structures having been demolished to make way for the proposed development.

Step 3: What impact will the site allocation have on that significance?

Any development on this site will have an impact on the surrounding heritage assets, and therefore it is important that due consideration is made to creating something that will be sympathetic to those adjacent designated and non-designated heritage assets.
Step 4: **What can be done in mitigation to maximise enhancements and avoid harm?**

It is vital that well-conceived and well-designed developments are installed here, sympathetic to the setting of the designated and non-designated heritage assets nearby. Due consideration should be paid to the positioning, height, design, massing and materials used of any new development to ensure that there is less than significant harm to the setting of the designations nearby.

Step 5: **Is the proposed site allocation appropriate in light of the NPPF’s tests of soundness?**

The proposed site allocation is considered appropriate, in that as well as presuming in favour of sustainable development, it will also ensure that the site, which currently has a detrimental effect on the area is developed into a flourishing and dynamic landmark building on the Hoe, contributing in a positive way to the setting of the designations within the area and becoming a key feature of the Hoe. As a result, it is important that the new development relates well to all the designations and is in line with points 126, 128-136 and 140 of the NPPF and the Local Plan policies.
Site Selection Methodology:
Step 1: Are any heritage assets are affected by the potential site allocation?
Although there are no designated heritage assets within the site, the building at the junction of Bath Place East and Bath Place, an old warehouse, which appears on the 1856 OS map, would be considered a non-designated heritage asset. The site abuts the Union Street conservation area to the north and west and is close to the Hoe conservation area to the south west. In terms of the non-designated heritage assets, these have been identified in the Union Street Conservation area. These are buildings that were part of John Foulston’s development of Union Street, which was commissioned in 1810 to be a link road between Plymouth, Stonehouse and Devonport.

There is no known archaeology, however, any proposed development would require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.

Step 2: **What contribution does the site make to the significance of the heritage asset?**
This is a brownfield site, some of which contains existing buildings, and some of which has already been cleared and is currently being used as a car park. Because the site abuts the Union Street conservation area, an area of the city developed during the Georgian period to connect Plymouth with Stonehouse and Devonport, many of the buildings backing onto this site are Georgian. The allocated site, given its proximity to the conservation area, contributes in terms of setting.
Step 3: **What impact will the site allocation have on that significance?**
The site allocation is for housing-led mixed use, which suggests that this area could be heavily developed. Any development on this site could have an impact on the surrounding non-designated heritage assets, and therefore it is important that due consideration is made to creating something that will be sympathetic to those adjacent non-designated heritage assets. There would also be additional issues caused by an inevitable increase of car parking, which could also have a detrimental impact on the setting of the non-designated heritage assets.

Step 4: **What can be done in mitigation to maximise enhancements and avoid harm?**
It is vital that well-conceived and well-designed developments are built on this site, which are sympathetic to the setting of the designated and non-designated heritage assets nearby. Due consideration should be made to the positioning, height, design, massing and materials used in any new development to ensure that there is less than significant harm to the setting of the designated and non-designated heritage assets that overlook the site.

Step 5: **Is the proposed site allocation appropriate in light of the NPPF’s tests of soundness?**
This is considered to be a positively prepared plan and the most appropriate strategy in ensuring sustainable development whilst retaining less than substantial harm to the nearby designated and non-designated heritage assets. It is considered that the plan will be deliverable over its period and that it not only ensures the method of sustainable development is achievable but is also consistent with the conservation of the designated and non-designated heritage assets in the area in terms of setting and is in line with points 126, 128-136 and 140 of the NPPF and the Local Plan policies.
Site Selection Methodology:
Step 1: **Are any heritage assets affected by the potential site allocation?**
Although there are no designated heritage assets within the area itself, there are two standard lamp bases that date from the time that this area was the South Devon Railway Station (later becoming Millbay Station) which was built prior to 1856. The railway station was eventually demolished post-war and was developed as the Pavilions in the 1980s but the standard lamp bases remain within the public space and are identified as non-designated heritage assets. There are also a number of heritage assets overlooking the site, including the New Continental Hotel and the Duke of Cornwall Hotel, which stand to the east and south of the site respectively. The area stands between the Union Street conservation area to the west and the Hoe conservation area to the east.

There is no known archaeology, however, any proposed development would require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.

Step 2: **What contribution does the site make to the significance of the heritage asset?**
This is a brownfield site, which contains the Pavilions, built during the 1980s, which represent a poor relationship with the existing buildings on Union Street and Bath Street. Because the site abuts the Union Street conservation area, an area of the city developed during the Georgian period to connect Plymouth with Stonehouse and Devonport, many of the buildings that overlook this site to the west are Georgian, whilst the two listed hotels to the east and south are Victorian. The allocated site, given its proximity to the conservation area, contributes in terms of setting. The two standard lamp bases have currently been left in ad hoc positions within the site, which do not relate to their original position.
Step 3: **What impact will the site allocation have on that significance?**
The site allocation is for mixed use, which suggests that this area could be heavily developed. This could cause substantial harm on the setting of the surrounding designated and non-designated heritage assets and the setting of the adjoining conservation areas unless sensitively conceived. There could also be additional issues caused by an inevitable increase of car parking, which could also affect the setting of the designated and non-designated heritage assets.

Step 4: **What can be done in mitigation to maximise enhancements and avoid harm?**
It is vital that well-conceived and well-designed developments are built on this site, which are sympathetic to the setting of the designated and non-designated heritage assets nearby. Due consideration should be made to the positioning, height, design, massing and materials used in any new development to ensure that there is less than significant harm to the setting of the designated and non-designated heritage assets that overlook the site. The two lamp standard bases should be incorporated into the newly developed public realm surrounding this site.

Step 5: **Is the proposed site allocation appropriate in light of the NPPF’s tests of soundness?**
This is considered to be a positively prepared plan and the most appropriate strategy in ensuring sustainable development whilst retaining less than substantial harm to the nearby designated and non-designated heritage assets. It is considered that the plan will be deliverable over its period and that it not only ensures the method of sustainable development is achievable but is also consistent with the conservation of the designated and non-designated heritage assets in the area in terms of setting and is in line with points 126, 128-136 and 140 of the NPPF and the Local Plan policies.
Site reference: PLY32

Site: Stonehouse Barracks, Stonehouse

Allocation: Housing-led mixed use (residential and sports/playing pitch)

NGR: SX 46480 53856

Site Selection Methodology:

Step 1: Are any heritage assets are affected by the potential site allocation?

As well as standing within the Stonehouse Peninsula conservation area, the site contains a large number of designated heritage assets including the scheduled Eastern King battery at the south end of the site, and a variety of buildings, which are listed at Grade II* and Grade II. The barracks were developed from the mid-18th century and present a rare survival of a complete, non-fortified, barracks of great historic value.

There is no known archaeology, however, any proposed development would require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.

Step 2: What contribution does the site make to the significance of the heritage asset?

The allocated site involves the whole barracks and their associated lands, buildings and structures. The site is of group value, in that it has evolved as a barracks since its inception from 1779, and provides a setting to the many listed buildings and the scheduled monument that stand within it.

Step 3: What impact will the site allocation have on that significance?

The site allocation will need to be carried out with great sympathy to the layout of the barracks in order to avoid substantial harm to the heritage assets, both in terms of their individual renovation, but also to their setting. Officers have already been invited to examine the area in order to gain some understanding of what features the site holds.
Step 4: **What can be done in mitigation to maximise enhancements and avoid harm?**
Any development/regeneration should be informed by a historic character assessment and form part of the estate's Historic Management Overview to ensure a holistic and co-ordinated approach across the estate. This should include repair and regeneration of the heritage assets; ensuring that any new developments are built sympathetically within the site so that they cause no harm in terms of setting to the existing buildings; removing inappropriate additions to the existing buildings; extending the coastal path through the site and providing interpretation boards/history apps to assist with understanding the importance of the area, this can tie into the other major site on this peninsula at the Royal William Yard.

Step 5: **Is the proposed site allocation appropriate in light of the NPPF’s tests of soundness?**
It is desirable in ensuring that the significant heritage assets within this site are sustained and enhanced and that they are put to viable uses consistent with their conservation, however, this can only be carried out through sympathetic restoration and design works. This is considered to be a positively prepared plan and the most appropriate strategy in ensuring sustainable development whilst retaining less than substantial harm to the nearby designated and non-designated heritage assets. It is considered that the plan will be deliverable over its period and that it not only ensures the method of sustainable development is achievable but is also consistent with the conservation of the designated and non-designated heritage assets in the area in terms of setting and is in line with points 126, 128-136 and 140 of the NPPF and the Local Plan policies.
Site reference: PLY35

Site: Drakes Island

Allocation: Heritage-led regeneration with controlled community access HOTEL / LEISURE

NGR: SX 46899 52831

Site Selection Methodology:

Step 1: Are any heritage assets affected by the potential site allocation?
With reference to the current proposal, the LPA historic environment officers and representatives of Historic England have provided consultation responses to the proposals to ensure that the significance of the heritage assets have been recognised and have confirmed that the proposal is acceptable in heritage terms. The site includes a number of designated heritage assets, including the scheduled coastal fortifications across much of the site and the Grade II barracks, ablution blocks, Commanding Officer’s House and the Guardhouse.

There is no known archaeology but the island has a history of occupation prior to the current structures and therefore there is a high archaeological potential on this site, therefore any proposed development would require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.

Step 2: What contribution does the site make to the significance of the heritage asset?
The site allocation will need to be carried out with great sympathy to the layout of the existing heritage assets in order to avoid substantial harm to them including their setting, as the island is developed to accommodate its allocation.

Step 3: What impact will the site allocation have on that significance?
The site allocation will need to be carried out with great sympathy to the layout of the barracks in order to avoid substantial harm to the heritage assets, both in terms of their individual renovation, but also to their setting. Officers have already been invited to examine the area in order to gain some understanding of what features the site holds.
Step 4: **What can be done in mitigation to maximise enhancements and avoid harm?**

Any development/regeneration should be informed by a historic character assessment and form part of the island’s Historic Management Overview to ensure a holistic and co-ordinated approach is established across the island. This should include conservation, repair and regeneration of the heritage assets; ensuring that any new developments are built sympathetically within the site so that they conserve and enhance the setting of the existing buildings; and removing inappropriate additions to the existing buildings.

Step 5: **Is the proposed site allocation appropriate in light of the NPPF’s tests of soundness?**

It is desirable in ensuring that the significant heritage assets within this site are sustained and enhanced and that they are put to viable uses consistent with their conservation, however, this can only be carried out through sympathetic restoration and design works. This is considered to be a positively prepared plan and the most appropriate strategy in ensuring sustainable development whilst retaining less than substantial harm to the designated heritage assets. It is considered that the plan will be deliverable over its period and that it not only ensures the method of sustainable development is achievable but is also consistent with the conservation of the designated heritage assets on the island in terms of setting and is in line with points 126, 128-136 and 140 of the NPPF and the Local Plan policies.
Site Selection Methodology:

Step 1: **Are any heritage assets affected by the potential site allocation?**

This site has been approved in terms of planning permission and the LPA historic environment officers and representatives of Historic England have provided consultation responses to the proposals to ensure that the significance of the heritage assets have been recognised. The Royal William Victualling Yard is one of the most remarkable and complete early 19th century industrial complexes in the country, and a unique English example of Neo-Classical planning of a state manufacturing site. Designed and built between 1824 and 1835 by Sir John Rennie, the yard includes a tidal basin, wharf walls, brewery, cooperage, storehouses, slaughterhouse, offices, mill and bakery as well as residences for senior Naval officers with Melville as the centrepiece of the composition. The Grade I listed building and most of the other buildings surrounding it within the Royal William Yard are listed, for the most part at the highest level of protection. The area itself was built upon reclaimed land at the end of the Stonehouse Peninsula, and therefore it is unlikely that, other than the Victualling Yard itself, there is any additional archaeology on the site. The area is also part of the Stonehouse Peninsula conservation area. The current developers have carried out sensitive conversions to many of the buildings within the yard enhancing the significance of the heritage assets and putting them to viable uses consistent with their conservation by converting them to mixed use, with shops, offices and restaurants with, for the most part, residential above. The main challenge has been the restricted space for parking available within the Yard, and indeed within the Peninsula area itself.

Step 2: **What contribution does the site make to the significance of the heritage asset?**

This is a Grade I listed building, built between 1823-32, of limestone ashlar with granite dressings under slate and concrete tile hipped mansard roofs, with some copper sheet. It is quadrangular in plan with a central gateway and flanking offices and has a square clock tower under a copper dome. It is of huge significance to the yard, being the key centrepiece building.
Step 3: **What impact will the site allocation have on that significance?**
The Royal William Yard has been carefully and sensitively converted over a number of years by various developers, although Urban Splash has carried out the main conversions. Melville is one of the last buildings to be developed in the yard. Currently the only part of the site being used is the area at the centre of the building, which is used for car parking. The proposal to convert this building to a hotel is welcomed as long as the conversion is carried out in a sensitive way so as not to detrimentally impact on both the building itself but also on the yard as a whole. One impact to the building will be the removal of parking facilities within the central square of the building. Parking within the Yard has been a hugely controversial aspect of this conversion with the visual impact of parked cars on all the buildings within the yard being seen as a negative but essential aspect of the conversion. Additional parking facility has, however, been identified outside the Yard, which will alleviate the alteration to availability of space within the Yard.

Step 4: **What can be done in mitigation to maximise enhancements and avoid harm?**
Because the building is protected by the highest possible grading, all work carried out to it, as with all the buildings that have been converted within the Yard, is being overseen by the historic environment officers at the Council as well as representatives of Historic England. All proposals for the conversion of this building to mixed use have been scrupulously analysed to ensure that there will be no/minimal harm to the historic fabric of the building and to its setting as well as to that of its neighbours.

Step 5: **Is the proposed site allocation appropriate in light of the NPPF’s tests of soundness?**
The proposed site allocation is to be welcomed in that it seeks to put the building to viable use consistent with its conservation. The longer the building is left empty and derelict, the longer and more expensive the project will be and therefore the less likelihood of finding a viable use. Once the building is put to use, it will contribute to the continued improvement of the Yard and indeed to the Stonehouse Peninsula as a whole, developing its sense of place and attractiveness and gaining prestige as a place to visit in Plymouth. This is considered to be a positively prepared plan and the most appropriate strategy in ensuring sustainable development whilst retaining less than substantial harm to the designated heritage asset. It is considered that the plan will be deliverable over its period and that it not only ensures the method of sustainable development is achievable but is also consistent with the conservation of the designated heritage asset in terms of setting and is in line with points 126, 128-136 and 140 of the NPPF and the Local Plan policies.
Site Selection Methodology:

Step 1: Are any heritage assets affected by the potential site allocation?
Although there are no designated heritage assets within the proposed site itself, the Grade II remains of New Bastion including part of the countercarp wall partially abuts the east side of the site and the Grade II listed Old Gun Wharf Wall stands to the south east. The site also stands within the Devonport Conservation area. There is a WWII and Cold War bunker standing within the site itself, which is considered as a non-designated heritage asset. Richmond Walk, too, which is likely to have been built in the late 18th/early 19th century and which is depicted on the 1838 map of the area, retains a steeply-battered limestone rubble wall along its northern boundary, and part of the southern boundary as well, stretching from the ditch of the Devonport Lines westwards towards Mutton Cove, and it is therefore identified as a non-designated heritage asset.

It is an area of high archaeological potential with the known route of the Devonport Lines (built c 1780) running through and around part of the site, and some additional boundary walls that may be of some significance to the earlier role of the area as part of the Plymouth Dock defences.

Step 2: What contribution does the site make to the significance of the heritage asset?
The site has some important key features relating to the Plymouth Dock defences and as such would be considered significant to the area as a whole.

Step 3: What impact will the site allocation have on that significance?
The impact of site allocation on the remaining heritage assets could cause substantial harm to their survival, but much is dependent on a desk-based assessment and possible field evaluation to appraise the full potential of the site. Because of these investigations, the site boundaries may need to be re-evaluated.
Step 4: **What can be done in mitigation to maximise enhancements and avoid harm?**

If the housing is not too dense and is arranged in such a way as to least impact on the remaining heritage assets then there may be some mitigation in approving development in this area. If careful consideration is made to the quality of design, height, use of materials and massing, it may be possible to avoid some detrimental harm to the remaining assets.

In the case of the World War II/Cold War bunker, if it were decided to demolish this assembly a full justification for its demolition would be required. If this justification were accepted, then a full photographic and historic analysis of this structure would need to be produced by a qualified archaeological contractor and approved by the LPA Historic Environment officers. All historic walling should be retained with measures taken to protect their fabric in the event of development proceeding.

Step 5: **Is the proposed site allocation appropriate in light of the NPPF’s tests of soundness?**

In terms of the presumption in favour of sustainable development, it may be that the proposed site allocation is appropriate; however, it will be at the expense of the loss of a unique heritage asset (i.e. the World War II/Cold War bunker). If the developer can provide evidence that this loss is inevitable and justifiable in order to provide sufficient economic and social benefits to the local economy then it is acknowledged that this may take precedence over retaining the structure, which could be difficult to convert to a viable use. In terms of the other heritage assets within and in the proximity of the site, these could potentially positively contribute to the character of the place and through careful maintenance and repair, would ensure that these heritage assets are not detrimentally impacted upon because of the proposed site allocation.
Site Selection Methodology:

Step 1: Are any heritage assets affected by the potential site allocation?
Although there are no designated heritage assets within this site, it stands within the Devonport conservation area and there are some attractive boundary walls to the north of the site, which would be considered as non-designated heritage assets. There are also a number of designated heritage assets within the proximity of the site.

This is an area of high archaeological potential because it is within the known route of the Devonport Lines (built c 1780). As such any proposed development would require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.

Step 2: What contribution does the site make to the significance of the heritage asset?
The archaeological potential suggests that the site does contribute to the significance of the heritage assets below ground and surrounding the site.

Step 3: What impact will the site allocation have on that significance?
The impact of site allocation on the remaining heritage assets could be detrimental to their survival but until full knowledge of the course of the Devonport Dock Lines is known it is not possible to understand the full impact. Because of identifying this course, the site boundaries may need to be re-evaluated.
Step 4: **What can be done in mitigation to maximise enhancements and avoid harm?**
If the housing is not too dense and is arranged in such a way as to least impact on the remaining heritage assets then there may be some mitigation in approving development in this area. Careful consideration will need to be made to the quality of design, height, use of materials and massing, in order to avoid some detrimental harm to the remaining assets.

The retention of all the walls would also be required, with minimal damage during development. The course of the Devonport Dock Lines should be plotted from known information and its remains avoided in the event of development being approved.

Step 5: **Is the proposed site allocation appropriate in light of the NPPF’s tests of soundness?**
In terms of the presumption in favour of sustainable development, it may be that the proposed site allocation is appropriate. In terms of the non-designated heritage assets within the site, these would positively contribute to the character of the place through continued careful and appropriate maintenance and repair. This is considered to be a positively prepared plan and the most appropriate strategy in ensuring sustainable development whilst retaining less than substantial harm to the designated heritage assets. It is considered that the plan will be deliverable over its period and that it not only ensures the method of sustainable development is achievable but is also consistent with the conservation of the designated heritage assets in terms of setting and is in line with points 126, 128-136 and 140 of the NPPF and the Local Plan policies.
Site reference: PLY36(4)

Site: Millfields Trust, 278 Union Street, Stonehouse

Allocation: Mixed use (community hub for Stonehouse, including employment and office use, community space, health and residential)

NGR: SX 46637 54376

Site Selection Methodology:
Step 1: Are any heritage assets are affected by the potential site allocation?
There are no designated heritage assets within the site, however there is the public house (originally known as the Lord High Nelson) which has been in situ since at least 1856, and this would be considered as a non-designated heritage asset. It stands opposite Rock Salt (which was The Mechanics Arms Public House), and they, alongside two other buildings, remain a unique reminder of the character of this area.

There is no known archaeology, however, any proposed development would require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.

Step 2: What contribution does the site make to the significance of the heritage asset?
The site, which is a brownfield site currently being developed as part of a community-based regeneration scheme, is to be welcomed in that it will ensure that Union Street fulfils its role in connecting surrounding neighbourhoods in line with the Plymouth Waterfront Strategic Masterplan. The proposal is to create a mixed-use site, and it is possible that this small public house could make a positive contribution to the site, given that it remains as a public house and Rock Salt opposite is now a small restaurant.

Step 3: What impact will the site allocation have on that significance?
The site allocation is for mixed use, which suggests that this area could be heavily developed. This could have some harm on the setting of the non-designated heritage assets. There would also be additional issues caused by an inevitable increase of car parking, which would also have a detrimental impact on the setting of the non-designated heritage assets.
Step 4: **What can be done in mitigation to maximise enhancements and avoid harm?**
It is important that well-conceived and well-designed developments be built on the site that are sympathetic to the setting of the non-designated heritage assets nearby. Careful consideration will need to be made to the quality of design, height, use of materials and massing, in order to avoid some harm to the remaining heritage assets.

Step 5: **Is the proposed site allocation appropriate in light of the NPPF’s tests of soundness?**
This is considered to be a positively prepared plan and the most appropriate strategy in ensuring sustainable development whilst retaining less than substantial harm to the nearby non-designated heritage assets. It is considered that the plan will be deliverable over its period and that it not only ensures the method of sustainable development is achievable but is also consistent with the conservation of the non-designated heritage assets in the area in terms of setting and is in line with points 126, 128-136 and 140 of the NPPF and the Local Plan policies.
Site Selection Methodology:
Step 1: Are any heritage assets affected by the potential site allocation?
Although there are no designated heritage assets within the site itself, there is the listed Grade II New Bastion including part of counterscarp wall overlooking the site from the south. This counterscarp wall continues behind part of the site to the west, with the high quarry walls of Richmond Walk Quarries, which were in use in 1864, but disused by 1892 along the rear of the site. The remaining houses that comprised Bakers Place, an early Victorian terrace, stand on this site and would be considered as non-designated heritage assets.

There is no known archaeology, however, any proposed development would require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.

Step 2: What contribution does the site make to the significance of the heritage asset?
This site is considered part of the wider expansion of the area when the defence lines around Plymouth Dock were being established. As a result, this site would have contributed in part to some of the more historically sensitive areas around it.

Step 3: What impact will the site allocation have on that significance?
The topography of this site will ensure that there will be less than substantial harm on most of the adjacent buildings and no harm to the Devonport lines, however, there is likely to be harm to the counterscarp wall if the proposed development of marine employment resources are not designed sensitively.
Step 4: **What can be done in mitigation to maximise enhancements and avoid harm?**
Careful consideration will need to be made to the quality of design, height, use of materials and massing, in order to avoid some harm to the remaining heritage assets and in particular not too close to the actual listed structure will ensure that the setting of the listed counterscarp wall is uninhibited. The listed wall should be maintained and enhanced appropriately with LPA Historic Environment officer guidance to ensure that there is no possible detrimental impact on its setting.

Step 5: **Is the proposed site allocation appropriate in light of the NPPF’s tests of soundness?**
This area is already currently being used for light industrial works. If the area is to be developed, further it will ensure that this area remains a viable economic contributor to the local economy. If the existing counterscarp wall is refurbished and maintained, then it would contribute in terms of the character of place around Richmond Walk.

This is considered to be a positively prepared plan and the most appropriate strategy in ensuring sustainable development whilst retaining less than substantial harm to the nearby designated and non-designated heritage assets. It is considered that the plan will be deliverable over its period and that it not only ensures the method of sustainable development is achievable but is also consistent with the conservation of the designated and non-designated heritage assets in the area in terms of setting and is in line with points 126, 128-136 and 140 of the NPPF and the Local Plan policies.
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<td>Brickfields Recreation Ground (SX 45807 54689)</td>
<td>Key multi-sport hub</td>
<td>Although there are no designated heritage assets within the site itself, there is the Grade II gatehouse to Raglan barracks overlooking the west side of the site. The site itself lies within the zone of the Devonport Dock Lines, a system of walls, ditches and bastions set up in the mid-18th century to defend the strategically important naval dockyard at Devonport from inland attack. However, the site allocation is considered to cause no harm to the setting or significance of the heritage asset. In terms of the archaeology, an evaluation exercise of the area was unable to identify with certainty any features relating to the Devonport Dock Lines. This was due to the level of landscaping that had occurred after the defences went out of use. The similarity of the deposits across the site suggests widespread levelling and landscaping from the 19th onwards, however, any proposed development requiring below ground excavation would require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.</td>
</tr>
</tbody>
</table>
Site reference: PLY38

Site: Derriford Commercial Centre

Allocation: Mixed use - new commercial and district centre, including health uses, retail uses, a range of housing including provision for health workers and students, officers and B1 workshops, education related uses and community uses

NGR: SX 49332 59479

Site Selection Methodology:

Step 1: Are any heritage assets affected by the potential site allocation?
There are no designated or non-designated heritage assets within the site itself. The scheduled Crownhill Fort overlooks the south west side and the Grade II* listed The Ship stands alongside the south east corner of this site. The area was originally agricultural land prior to 1895, when the Seaton Barracks were built between 1895 and 1906. These were demolished post-war, at the south west corner; the area has remained undeveloped since. The remaining area stayed undeveloped until after the wars, when Tavistock Road, and the roundabout was developed and Derriford Hospital was built on the site of Derriford House.

There is no known archaeology, however, any proposed development would require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.

Step 2: What contribution does the site make to the significance of the heritage asset?
This is a large expanse of land, some of which is already used as employment land and some of which has been left as undeveloped since the dismantling of the Seaton Barracks. Despite the relative closeness to the site, it is unlikely to have substantial harm on the setting of the scheduled monument because it is sufficiently distant from it and on the opposite side of the main road from this site. In addition, a modern hotel blocks the view across to the majority of the space. In terms of the listed building, however, great care will need to be taken to ensure that any proposed development to the south east side of the site, does not harm the setting of the Grade II* listed building.

Step 3: What impact will the site allocation have on that significance?
The site allocation is for mixed use, which suggests that this area could be heavily developed. This could have substantial harm on the setting of the adjacent designated heritage assets and the setting of the scheduled monument if it is not carried out sensitively.
Step 4: **What can be done in mitigation to maximise enhancements and avoid harm?**

It is important that well-conceived and well-designed developments be built on the site that are sympathetic to the setting of the designated heritage assets nearby. Careful consideration will need to be made to the quality of design, height, use of materials and massing, in order to avoid harm to the remaining designated heritage assets in the area.

Step 5: **Is the proposed site allocation appropriate in light of the NPPF’s tests of soundness?**

This is considered to be a positively prepared plan and the most appropriate strategy in ensuring sustainable development whilst retaining less than substantial harm to the nearby-designated heritage assets. It is considered that the plan will be deliverable over its period and that it not only ensures the method of sustainable development is achievable but is also consistent with the conservation of the designated heritage assets in the area in terms of setting and is in line with points 126, 128-136 and 140 of the NPPF and the Local Plan policies.
Site reference: PLY39

Site: South West Water Site, Glacis Park

Allocation: Mixed use development - including housing, office / B1, community and education uses

NGR: SX 48794 59587

Site Selection Methodology:
Step 1: Are any heritage assets affected by the potential site allocation?
Whilst there are no designated or non-designated heritage assets within the site, it abuts the scheduled Crownhill Fort to its southern boundary. The nearest listed building is the Grade II* listed Ship (Western Morning News building), which stands to the south east. Part of the line of the Plymouth and Devonport leats runs along the east side of the site, and these have been identified as non-designated heritage assets.

There is no known archaeology but it is likely to have high archaeological potential and therefore any proposed development would require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.

Step 2: What contribution does the site make to the significance of the heritage asset?
Currently the site is already partially developed with offices, commercial enterprises, car parking and sewage works. The developed area is not particularly attractive but is low-lying, with the tallest building on the site being the three-storey Windsor House to the north. The impact, therefore, on the scheduled monument in terms of setting is currently not excessive.

Step 3: What impact will the site allocation have on that significance?
The impact of any proposed new development will be wholly dependent on the design of the proposal, but if development is sensitively carried out then the impact on the fort should be relatively insignificant.
Step 4: **What can be done in mitigation to maximise enhancements and avoid harm?**
The glacis slope to the north of Crownhill Fort is predominantly covered in woodland, mainly deciduous but with some coniferous growth, in particular around the reservoir. Careful consideration will need to be made to the quality of design, height, use of materials and massing of any new development, in order to avoid some detrimental harm to the remaining assets. Continued consultation with Historic England building upon pre-application advice would be a requirement of any potential development proposal coming forward.

Step 5: **Is the proposed site allocation appropriate in light of the NPPF’s tests of soundness?**
The proposed site allocation is considered appropriate, in that as well as presuming in favour of sustainable development, it will also ensure that the proposed site is developed into what could make a flourishing and dynamic contribution to the area to the north of the city centre. However, it is important that the new development relates well to the fort and does not have a negative impact on its setting. This is considered to be a positively prepared plan and the most appropriate strategy in ensuring sustainable development whilst retaining less than substantial harm to the nearby-designated heritage assets. It is considered that the plan will be deliverable over its period and that it not only ensures the method of sustainable development is achievable but is also consistent with the conservation of the designated heritage assets in the area in terms of setting and is in line with points 126, 128-136 and 140 of the NPPF and the Local Plan policies.
Site reference: PLY40

Site: Charlton Crescent

Allocation: Housing

NGR: SX 49343 58771

Site Selection Methodology:
Step 1: Are any heritage assets affected by the potential site allocation?
The site itself has no designated or non-designated heritage assets within it, with the area remaining as agricultural land from at least 1895 until 2015. There are, however, a number of designated heritage assets within the proximity including the scheduled Bowden Battery, which is 204m to the south of the site and the scheduled Crownhill Fort, which is 391m to the north. Listed buildings in the vicinity include the Grade II listed Smallack House (and its associated curtilage listed barn) to the west and its Grade II associated Kitchen Garden walls and the Grade II*Ship (Western Morning News building) to the north. Although most of the historic hedgerows in the area have been removed, those remaining would be considered as contributing to the character and distinctiveness of the area and therefore, where possible, should be retained.

There is no known archaeology, however, any proposed development would require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.
Step 2: What contribution does the site make to the significance of the heritage asset?
This is a greenfield site, across additional greenfield and part of the historic landscape surrounding Bowden Battery. In particular, the topography of this area ensures that this field is clearly visible from certainly part of the ramparts of the fort. Although not part of the glacis, the site would have formed part of the historic landscape surrounding this fort. Crownhill Fort and the closest listed buildings are unlikely to be affected by any proposed development in this area because although, certainly in the case of Smallack Farm, there is a historic association with the field, there has been significant development around the listed building to result in the site being hidden from view.

Step 3: What impact will the site allocation have on that significance?
In terms of the setting of Crownhill Fort, there would be no harm because of the topography and the distance from the fort. However, as for Bowden Battery, any proposed development could cause significant harm to its setting, specifically the historic landscape surrounding the fort.

Step 4: What can be done in mitigation to maximise enhancements and avoid harm?
The judicious planting of trees, particularly to the north west of the Battery, would ensure that the impact of the proposed development would be eased through the provision of a buffer. It is also noted that there are a number of housing estates built in this area, that have followed/respected the contours of the land and thus it may well make less of an impact on the fort if any proposed housing estate respects the existing contours of the land. Careful consideration will need to be made to the quality of design, height, use of materials and massing, in order to avoid harm to the remaining heritage assets. Any remaining historic hedgerows and field boundaries should be retained.

An archaeological trial trench evaluation would be required to inform of the long-term use of this area prior to 1895.

Step 5: Is the proposed site allocation appropriate in light of the NPPF’s tests of soundness?
Agreement has already been reached to carry out a number of housing developments on this site, all of which have had some impact on the historic landscape surrounding Bowden Battery. However, a large part of this greenfield site is also to be retained in part as a Community Park and in part as an extension to the Bircham Valley Local Nature Reserve. Although there are implications to the setting of the Battery itself, given that the allocated area is not within the glacis area and given the economic and social demand for housing, and the NPPF’s ‘presumption in favour of sustainable development’, it is accepted that the proposed site allocation is appropriate as long as the mitigation measures are put in place. This is considered to be a positively prepared plan and the most appropriate strategy in ensuring sustainable development whilst retaining less than substantial harm to the nearby-designated heritage assets. It is considered that the plan will be deliverable over its period and that it not only ensures the method of sustainable development is achievable but is also consistent with the conservation of the designated heritage assets in the area in terms of setting and is in line with points 126, 128-136 and 140 of the NPPF and the Local Plan policies.

In terms of the historic hedgerows, these are seen as making an important contribution to the character of an area and may be historically (and archaeologically) important as indicators of land use and previous ownership. They also contribute to biodiversity, providing wildlife corridors through built up areas. As a result, the hedgerows abounding this site to the north and west are considered as heritage assets and should be retained as part of any proposed development.
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<tr>
<td>PLY42</td>
<td>Former Plymouth Airport (SX 50418 60274)</td>
<td>Aviation use</td>
<td>There are no designated or non-designated heritage assets either within or in the proximity of the site. The airport was established between the World Wars, and was closed in 2011. There is no known archaeology in the area, however, any proposed development would require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.</td>
</tr>
<tr>
<td>PLY43</td>
<td>University of St Mark and St John (SX 50206 59967)</td>
<td>University uses, including sports hub</td>
<td>There are no designated or non-designated heritage assets either within or in the proximity of the site. This site was agricultural land from at least 1895, until it was developed for the University. There is no known archaeology in the area, however, any proposed development would require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.</td>
</tr>
</tbody>
</table>
Site Selection Methodology:

Step 1: Are any heritage assets affected by the potential site allocation?
Although there are no designated heritage sites within the site allocation, there are a number surrounding it that may be affected by any development. These include the scheduled Crownhill Fort and Bowden Battery at the west end and at the south west of the site respectively. There is also the Grade II* The Ship to the north and the Grade II Smallack Farm structures to the south.

There is no known archaeology, and whilst this area is brownfield site, the buildings built on this site are modern and employment buildings. Any proposed below ground development would require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.

Step 2: What contribution does the site make to the significance of the heritage asset?
This is a brownfield site, some of which is already used as employment land. In terms of the designated heritage assets, great care will need to be taken to ensure that any proposed development to the site, does not harm the setting of them.

Step 3: What impact will the site allocation have on that significance?
The site allocation is for employment use, and is likely to mean that this area could be heavily developed. This could cause substantial harm to the setting of the designated heritage assets nearby if it is not carried out sensitively.
Step 4: **What can be done in mitigation to maximise enhancements and avoid harm?**

It is important that well-conceived and well-designed developments be built on the site that are sympathetic to the setting of the designated heritage assets nearby. Careful consideration will need to be made to the quality of design, height, use of materials and massing, in order to avoid harm to the remaining heritage assets. By retaining much of the tree growth and hedges around this site, it will also ensure that the impact of the developments on the settings of heritage assets would be reduced through an appropriate buffer.

Step 5: **Is the proposed site allocation appropriate in light of the NPPF’s tests of soundness?**

The proposed site allocation is considered appropriate, in that as well as presuming in favour of sustainable development, it will also ensure that the proposed site is developed into what could make a flourishing and dynamic contribution to the area to the north of the city centre, providing a quality employment base for local residents. However, it is important that the new development relates well to the designated heritage assets and does not have a negative impact on its setting. If the recommended factors offered in mitigation are taken on board then it will ensure that the setting of the heritage assets in the area are not harmed by the proposal. It is considered that the plan will be deliverable over its period and that it not only ensures the method of sustainable development is achievable but is also consistent with the conservation of the designated heritage assets in the area in terms of setting and is in line with points 126, 128-136 and 140 of the NPPF and the Local Plan policies.
Site reference: PLY46(5)  

Site: The Ship  

Allocation: This site is considered for employment (Reuse of listed building to support wider employment park function)  

NGR: SX 49563 59237

Site Selection Methodology:  
Step 1: Are any heritage assets affected by the potential site allocation?  
Other than the Grade II* listed Ship (Western Morning News building), there are no other designated or non-designated heritage assets within this site. The scheduled Bowden Battery stands 683m to the south east, and the scheduled Crownhill Fort stands 564m to the north west. Both are separated from the site by other buildings and in the case of Bowden Battery a series of green fields.  

In terms of previous uses of the site, the 1894 OS map shows this whole area was agricultural fields with a quarry to the east of the site.  

There is no known archaeology, however, any proposed development would require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.  

Step 2: What contribution does the site make to the significance of the heritage asset?  
The contribution the site makes to the significance of the heritage asset is through its setting. Currently there is a car park to the south east and green lawns to the north, west and east surrounding the office building. Any development of this site to increase the employment viability would need to be carried out with sensitivity to the existing listed building and its setting. In terms of the setting of Bowden Battery (inclusive of its northern glacis, although it has not been formally assessed there is screening as a result of modern buildings to the south of the Ship.
Step 3: **What impact will the site allocation have on that significance?**
The site wraps around a Grade II* listed building so any proposed works to that site could cause significant harm to the setting of the listed building. In terms of Bowden Battery, it is not considered that there will be any impact on its significance.

Step 4: **What can be done in mitigation to maximise enhancements and avoid harm?**
The design of any additional buildings within the site should be informed by the existing building, and sufficient space around the building should be retained to ensure that the setting of the listed building is not detrimentally impacted upon.

Step 5: **Is the proposed site allocation appropriate in light of the NPPF’s tests of soundness?**
Whilst it is considered that the proposed site allocation would be appropriate in light of the NPPF’s tests of soundness, in terms of ensuring that the building is put to a viable use consistent with its conservation (it is currently empty) and that the area surrounding it contributes to the wider economic benefits of the site itself. Any new development within the site must make a positive contribution to the listed building in terms of to the quality of design, height, use of materials and massing so that the setting is harmed as little as possible by the proposal. It is considered that the plan will be deliverable over its period and that it not only ensures the method of sustainable development is achievable but is also consistent with the conservation of the designated heritage asset in terms of its setting and is in line with points 126, 128-136 and 140 of the NPPF and the Local Plan policies.
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<tr>
<td>PLY46(6)</td>
<td>Plymouth Science Park Phase 6 (SX 50279 59397)</td>
<td>Employment (B1 use classes)</td>
<td>There are no designated or non-designated heritage assets within the site there is a Grade II listed Fursdon House and Cottage 134m to the south east of the site. There may also be an historic hedgerow surrounding the site. The site has been allocated as agricultural land since at least 1895. The small section at the south east corner of the site is Flood Risk 3 as well as being part of a larger TPO. There is no known archaeology in the area, however, any proposed development would require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.</td>
</tr>
<tr>
<td>PLY46(7)</td>
<td>Island Farmhouse, Plymbridge Road, Derriford (SX 49874 59957)</td>
<td>Housing</td>
<td>There are no designated heritage assets either within or in the proximity of this site. Appearing as agricultural land in 1895, Island Farmhouse was developed between 1906 and the post-war period. There is no known archaeology, however, any proposed development would require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.</td>
</tr>
</tbody>
</table>
Site Selection Methodology:

Step 1: Are any heritage assets are affected by the potential site allocation?
There are no designated or non-designated heritage assets within the site itself. However, the site stands 51m from the glacis surrounding Crownhill Fort scheduled monument. The area has remained as agricultural land from at least 1895 until after WWII, when it was developed for the GPO Engineering Department, and is now a BT Depot.

Although there is no known archaeology on this site, it is known that there were some mining works carried out in the vicinity related to Wheal Genny and Wheal Whitleigh, developed in the 1850s but no longer apparent by 1895, and therefore the site would be considered to be of high archaeological potential and as a result any proposed development would require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.

Step 2: What contribution does the site make to the significance of the heritage asset?
Currently the site is already developed as a 2-storey BT depot building. In terms of the topography of the area, the land stands at a lower level than the land surrounding the fort and is encircled by trees thus the presence of the building causes less than significant harm to the setting of the fort.

Step 3: What impact will the site allocation have on that significance?
The site allocation is to develop this area as housing. It also seeks to retain the green corridor, which will ensure that the historic link between the forts is retained, at least in part. The impact of the housing on the setting of the fort depends very much on the design of the buildings, in particular their height.
Step 4: **What can be done in mitigation to maximise enhancements and avoid harm?**

It is important that well-conceived and well-designed developments be built on the site that are sympathetic to the setting of the designated heritage asset nearby. Careful consideration will need to be made to the quality of design, height, use of materials and massing, in order to avoid harm to the remaining heritage assets.

Step 5: **Is the proposed site allocation appropriate in light of the NPPF’s tests of soundness?**

This is considered to be a positively prepared allocation and the most appropriate strategy in ensuring sustainable development whilst retaining less than substantial harm to the nearby designated and non-designated heritage assets. It is considered that the plan will be deliverable over its period and that it not only ensures the method of sustainable development is achievable but is also consistent with the conservation of the designated and non-designated heritage assets in the area in terms of setting and is in line with points 126, 128-136 and 140 of the NPPF and the Local Plan policies.
Site Selection Methodology:

Step 1: **Are any heritage assets affected by the potential site allocation?**
There are no designated heritage assets within the site although the scheduled Crownhill Fort stands to the north of the site. The site abuts an historic embankment associated with Crownhill Fort, originally designed to protect the east flank of the access road to the fort. It is orientated north-northeast to south-southwest and extends for approximately 130m. The embankment is shown on the 1864-95 OS map and remains as an upstanding earthwork to date. It is identified as a non-designated heritage asset. There is a current proposal, which has been refused on design and transport grounds and is at appeal. In terms of the embankment, the LPA historic environment officers have provided consultation responses to the proposals to ensure that the significance of the heritage assets have been recognised. It is noted that the proposal will stand to the east of the embankment and that ground works will not affect it.

There is no known archaeology, however, any proposed development that directly affects the embankment would require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.

Step 2: **What contribution does the site make to the significance of the heritage asset?**
Currently the space behind the embankment is partially developed with some housing, with the rest remaining as green space, lawn and trees.

Step 3: **What impact will the site allocation have on that significance?**
This is a relatively small area of land and it is considered that the proposed level of housing could cause harm if it were to impact on the non-designated heritage asset.
Step 4: **What can be done in mitigation to maximise enhancements and avoid harm?**
Any proposed development should be restricted to the east side of the site, away from the embankment and the historic embankment should remain in situ, providing a buffer between any proposed housing and the main road. Careful consideration will need to be made to the quality of design, height, use of materials and massing, in order to avoid harm to the asset.

Step 5: **Is the proposed site allocation appropriate in light of the NPPF’s tests of soundness?**
Whilst this site allocation is considered to be appropriate with a strategy ensuring sustainable development, it is important that in order to avoid harm to the nearby non-designated heritage asset a large proportion of the embankment be retained. It is considered that the plan will be deliverable over its period and that, if the mitigating factors are embraced, then it will avoid the potential harm to the heritage asset. Thus, it will ensure the method of sustainable development is achievable but is also consistent with the conservation of the non-designated heritage asset in the area in terms of setting and is in line with points 126, 128-136 and 140 of the NPPF and the Local Plan policies.
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<tbody>
<tr>
<td>PLY46(11)</td>
<td>Land South West of Belliver Way (Former playing fields to west of Becton Dickinson), Belliver (SX 49538 61913)</td>
<td>Employment</td>
<td>There are no designated or non-designated heritage assets either within or in the proximity of this site. This land was part of the Belliver estate grounds, identified as agricultural until the post-war period. There is no known archaeology, however, any proposed development would require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.</td>
</tr>
</tbody>
</table>
Site reference: PLY53

Site: Former China Clay site, Coypool

Allocation: Housing-led development

NGR: SX 52187 57518

Site Selection Methodology:
Step 1: Are any heritage assets are affected by the potential site allocation?
There are no designated heritage assets within the proposed site allocation although it is likely that the remaining hedgerows on this site are historic and therefore would be considered as non-designated heritage assets. In terms of the nearest listed buildings, the Grade II* Boringdon Arch lies 212m to the east and part of the scheduled Boringdon Park remains stand to the north east. The nearest scheduling is the Lee Moor Tramway Bridge, which stands just to the south west of the site. The site is also circa 725m from scheduled Efford Fort and Efford Emplacement to the south west and 570m at its nearest point from the Grade II* Saltram Registered Park and Garden to the south. The Grade II listed Great Woodford Farmhouse, which is hidden from view of this site by housing, stands to the south of this site. The area was predominantly agricultural until the post war period, and has subsequently been used for light industrial use.

There is no known archaeology on this site, but there is currently a planning application for this site (16/01278/FUL) for which a full EIA has been prepared by LDA design in advance of the proposed housing development.

Step 2: What contribution does the site make to the significance of the heritage asset?
The contribution that the site makes to the significance of the heritage assets, in that the site is currently used for light industrial use, is likely to be of relatively low significance. However, the site can be seen from part of the Saltram estate, particularly that part of the park closest to the River Plym and from part of Efford Fort.
Step 3: **What impact will the site allocation have on that significance?**
This would very much depend on the quality of any development, given that Boringdon Arch is relatively close to the site, there would be an expectation of an acceptably high quality of build in order to avoid detrimental impact on the neighbouring site.

Step 4: **What can be done in mitigation to maximise enhancements and avoid harm?**
If development is to be carried out in this area, then a high quality design would be expected for it, to avoid any a detrimental impact on the setting of the remaining historic elements within the area including the Boringdon Arch, Efford Fort and its emplacement and the setting of the Saltram Registered Park and Garden.

In terms of the archaeology, an archaeological desk-based assessment as part of the EIA produced by LDA Design has been recently received and is currently being evaluated. As a result, an assessment will be made as to whether field evaluation would be required prior to any development being approved.

Step 5: **Is the proposed site allocation appropriate in light of the NPPF’s tests of soundness?**
The area is currently inactive although the northern end is still laid out for light industrial works. This is considered to be a positively prepared allocation and the most appropriate strategy in ensuring sustainable development whilst retaining less than substantial harm to the nearby designated and non-designated heritage assets as long as those issues raised in mitigation are followed. It is considered that the plan will be deliverable over its period and that it not only ensures the method of sustainable development is achievable but is also consistent with the conservation of the designated and non-designated heritage assets in the area in terms of setting and is in line with points 126, 128-136 and 140 of the NPPF and the Local Plan policies.

The proposed housing-led allocation may be appropriate and may assist in terms of the NPPF’s presumption in favour of sustainable development. However, it is important to understand what archaeology there may remain within this site so a field evaluation may be required in order to understand the site fully prior to any development being approved and should the idea of development be acceptable then it is important that it is of the highest quality in order that it relates well to the remaining historic environment in terms of height, design, layout and materials used.

In terms of the historic hedgerows, these are seen as making an important contribution to the character of the area and may be historically (and archaeologically) important as indicators of land use and previous ownership. They also contribute to biodiversity, providing wildlife corridors through built up areas. As a result, the hedgerows throughout this site are considered as heritage assets and should be retained as part of any proposed development.
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<tbody>
<tr>
<td>PLY56(1)</td>
<td>Former nursery Haye Road (SX 53112 53627)</td>
<td>Housing</td>
<td>There are no designated or non-designated heritage assets within or in the proximity of the site. The area appears to have remained as agricultural land until the post-war period when it was developed as a nursery. Given its proximity to the work being carried out at the east side of the city, relating to the Sherford development, there is high archaeological potential. There is no known archaeology in the area, however, any proposed development would require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.</td>
</tr>
<tr>
<td>PLY56(2)</td>
<td>Pomphlett Industrial Estate (SX 51067 54121)</td>
<td>Mixed use - housing / retail</td>
<td>There are no designated or non-designated heritage assets within or in the proximity of the site. Originally part of the Pomphlett Farm site since at least 1895, likely to be much earlier, the site was redeveloped post-war. There is no known archaeology in the area, however, any proposed development would require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.</td>
</tr>
</tbody>
</table>
Site Selection Methodology:
Step 1: Are any heritage assets affected by the potential site allocation?
The Grade II* Saltram Registered Park lies to the north, north east and south east of the allocated site. Originally used as part of a race course during the 19th century, the site was converted to waste management in the 1980s. The nearest listed buildings are the Grade II Point Cottage and its associated separately listed quay walls 552m to the north and The Morley Arms Public House 448m to the south. The historic Long Ride, a driveway leading to Saltram House, is a non-designated heritage asset that runs to the west of the site. An initiative by PCC is currently underway to enhance The Ride and works to this end are already in place.

There is no known archaeology, however, any proposed development would require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.

Step 2: What contribution does the site make to the significance of the heritage asset?
The site is not considered to contribute to the significance of the heritage asset, as it is an existing waste management plant, and through the proposed allocation would remain as such.

Step 3: What impact will the site allocation have on that significance?
Since the area is already used for waste management and the proposal is to continue this use, it is unlikely that there will be any impact because of the site allocation.

Step 4: What can be done in mitigation to maximise enhancements and avoid harm?
It is noted that trees have been planted along the Long Ride to hide the historic drive from the waste management works; additional works are already underway to protect the setting of this heritage asset.
Step 5: **Is the proposed site allocation appropriate in light of the NPPF’s tests of soundness?**
Since the site allocation is already in existence, it is considered that the impact on the existing heritage assets will be negligible. This is considered to be a positively prepared allocation and the most appropriate strategy in ensuring sustainable development whilst retaining less than substantial harm to the nearby designated and non-designated heritage assets as long as those issues raised in mitigation are followed. It is considered that the plan will be deliverable over its period and that it not only ensures the method of sustainable development is achievable but is also consistent with the conservation of the designated and non-designated heritage assets in the area in terms of setting and is in line with points 126, 128-136 and 140 of the NPPF and the Local Plan policies.
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<tr>
<td>PLY56(4)</td>
<td>Former Western National site, Laira Bridge (SX 49861 54505)</td>
<td>Mixed use incorporating commercial uses (potentially small scale retail, leisure and/or hotel) and residential</td>
<td>Although there are no designated or non-designated heritage assets within the site or in the proximity, this area may be visible from the Saltram Registered Park to the east. There was some development of this site from prior to 1856. There is no known archaeology, however, any proposed development would require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation. The site stands within a Flood Risk 3 area.</td>
</tr>
<tr>
<td>PLY56(5)</td>
<td>Prince Rock playing pitch site (SX 49938 54610)</td>
<td>Mixed use development exploiting waterfront location and situated on strategic cycle network and Plym Valley. Public house / restaurant, leisure related retail and cycle hire facilities with parking.</td>
<td>There are no designated or non-designated heritage assets within the site although the Saltram Registered Park and Garden stands to the east of the site. The area lies alongside the River Plym, and. This area remained as the Laira mudflats until the area was reclaimed at the end of the 19th century. There is no known archaeology, however, any proposed development would require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.</td>
</tr>
<tr>
<td>PLY56(6)</td>
<td>Land at Moorcroft Quarry (SX 52606 54168)</td>
<td>Waste Management uses</td>
<td>There are no designated or non-designated heritage assets within or in the proximity of the site. The site appears to have been agricultural land since at least 1895, and by 1933, it was allocated as market gardens. There is no known archaeology in the area, however, any proposed development would require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.</td>
</tr>
<tr>
<td>PLY58(1)</td>
<td>Land at St. Levan Gate (SX 45206 55963)</td>
<td>Medium sized food retail store</td>
<td>There are no designated or non-designated heritage assets within the site itself, but on the opposite side of the road, there is the listed boundary wall of North Yard. By 1856 the site had been developed to accommodate the Devonport Gas and Coke Plant, and this remained in situ until the post war period when the depot became redundant. There is mention in the OS maps of ‘stones’ at the east side of the site. There is no known archaeology, however, any proposed development would require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.</td>
</tr>
<tr>
<td>PLY58(2)</td>
<td>Home Park (SX)</td>
<td>Completion of</td>
<td>There are no designated or non-designated heritage assets within the site or in the proximity of the site. The site appears to have been agricultural land since at least 1895, and by 1933, it was allocated as market gardens. There is no known archaeology in the area, however, any proposed development would require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.</td>
</tr>
<tr>
<td>Site Allocation and the Historic Environment</td>
<td>Stadium improvements and appropriate ancillary uses.</td>
<td>heritage assets within or in the proximity of the site. The Home Park recreational ground was already in situ by 1895. There is no known archaeology in the area however, any proposed development would require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.</td>
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<tr>
<td>PLY58(3) Coombe Way &amp; Kings Tamerton Road (SX 45737 58310)</td>
<td>Housing</td>
<td>There are no designated and non-designated heritage assets within or in the proximity of the site. The site has remained greenfield space since at least 1895. There is no known archaeology in the area, however, any proposed development would require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.</td>
<td></td>
</tr>
<tr>
<td>PLY58(4) Tamar Valley School Barne Barton (SX 43992 57985)</td>
<td>Housing</td>
<td>There are no designated or non-designated heritage assets within or in the proximity of the site. The site appears to have been agricultural land since at least 1895 until the post-war period when the site was developed as a school. There is no known archaeology in the area, however, any proposed development would require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.</td>
<td></td>
</tr>
<tr>
<td>PLY58(5) North Prospect redevelopment phase 4 (SX 46235 57050)</td>
<td>Housing</td>
<td>There are no designated and non-designated heritage assets either within or in the proximity of the site. By 1895 this site was predominantly agricultural land, although the Devonport leat ran through it, and there were some cottages at the north west corner. The whole site became residential between 1914 and 1933. There is no known archaeology in the area, however, any proposed development would require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.</td>
<td></td>
</tr>
<tr>
<td>PLY58(6) North Prospect redevelopment phase 5 (SX 45984 56926)</td>
<td>Housing</td>
<td>There are no designated and non-designated heritage assets either within or in the proximity of the site. This site appears to have been agricultural land since at least 1895 until developing as a residential area between 1914 and 1933. There is no known archaeology in the area, however, any proposed development would require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.</td>
<td></td>
</tr>
<tr>
<td>PLY58(7) Douglass House, Efford (SX 50321 56637)</td>
<td>Health hub with housing</td>
<td>There are no designated or non-designated heritage assets either within the site or in its proximity. This site has remained as agricultural land until it became part of the grounds.</td>
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</tbody>
</table>
associated with Efford Secondary School post war. There is no known archaeology in the area, however, any proposed development would require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.

<table>
<thead>
<tr>
<th>Site Code</th>
<th>Location and Description</th>
<th>Use</th>
<th>Details</th>
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</thead>
<tbody>
<tr>
<td>PLY58(8)</td>
<td>Windsor Road (SX 49808 57026)</td>
<td>Housing</td>
<td>There are no designated heritage assets within the site or in the proximity. The site was agricultural land until between 1906 and 1911 when it was developed as the Compton Brickworks, which have remained in situ ever since. It is unknown how many of the historic artefacts remain within this site. There is no known archaeology in the area, however, any proposed development would require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.</td>
</tr>
<tr>
<td>PLY58(9)</td>
<td>Former Gas Works, St Levan Road Site (SX 46297 56289)</td>
<td>Housing</td>
<td>There are no designated or non-designated heritage assets either within or in the proximity of the site. This site was agricultural land from at least 1895, although the Ford leat ran through the site on an east/west trajectory. By 1914 one of the Gasometers was already on site on the land, followed by 1933 with the second. There is no known archaeology in the area, however, any proposed development would require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.</td>
</tr>
<tr>
<td>PLY58(10)</td>
<td>Ham Drive, Pennycross (SX 47473 57493)</td>
<td>Housing</td>
<td>There are no designated or non-designated heritage assets on the site or in the proximity of it. This site has remained as green space since at least 1895 until 1933 when part of the site was developed for the Greyhound stadium. Subsequently housing has been built surrounding the site. There is no known archaeology, however, any proposed development would require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.</td>
</tr>
<tr>
<td>PLY58(11)</td>
<td>Duke Street, Devonport (45175 54464)</td>
<td>Car parking for strategic events</td>
<td>There are no designated or non-designated heritage assets within the site, however as it stands within the South Yard complex there are a number of historic assets, both designated and non-designated. Originally outside the South Yard area, this area was covered in terraced housing from before 1856, until the post-war period when an additional section of walling was run around this site. However, given the allocation, it is unlikely that there will be any harm to the heritage assets in terms of setting. There is no known</td>
</tr>
</tbody>
</table>
archaeology, however, any proposed development would require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.
Site Selection Methodology:

Step 1: Are any heritage assets affected by the potential site allocation?

The site lies partially under the existing main train line that runs to/from Cornwall. Although there are no designated heritage assets within the site, a small section of the Great Western railway, which originally led to Millbay Docks, remains with the brick piers and one of the cantilever arms standing as testament of that time and these would be considered as non-designated heritage assets. Originally part of Stonehouse Creek, this area has remained undeveloped and abuts Victoria Park to the west. The North Stonehouse conservation area stands to south west of the site.

There is no known archaeology, however, any proposed development would require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.

Step 2: What contribution does the site make to the significance of the heritage asset?

The site does make a contribution to the significance of the heritage asset in that the asset runs across/above it. Currently the site has been allocated for private car parking, although it appears to be generally unused for much of the time. Therefore the heritage asset has not been affected by the allocation. However, over time there has been a substantial amount of fly-tipping that has taken place around the foot of the brick piers and some graffiti is also evident and therefore maintenance to the remaining part of the heritage asset has not been carried out effectively.

Step 3: What impact will the site allocation have on that significance?

It is likely that there would be an impact on the heritage asset should the decision to allocate the site for housing take place.
Step 4: **What can be done in mitigation to maximise enhancements and avoid harm?**

By retaining the brick piers and cantilever arm, and refurbishing them as part of any proposed housing scheme it may be that the heritage assets would contribute to the character and distinctiveness of the allocation. Careful consideration will need to be made to the quality of design, positioning, height, use of materials and massing, in order to avoid harm to the remaining heritage assets.

Because there is no known archaeology in this area a desk-based assessment of the area would be expected prior to any approval of building works. The layout, height, design and materials used to build the housing should be careful monitored to ensure that they relate well to the existing heritage assets within the site.

Step 5: **Is the proposed site allocation appropriate in light of the NPPF’s tests of soundness?**

This is considered to be a positively prepared allocation and the most appropriate strategy in ensuring sustainable development whilst retaining less than substantial harm to the nearby designated and non-designated heritage assets as long as those issues raised in mitigation are followed. It is considered that the plan will be deliverable over its period and that it not only ensures the method of sustainable development is achievable but is also consistent with the conservation of the designated and non-designated heritage assets in the area in terms of setting and is in line with points 126, 128-136 and 140 of the NPPF and the Local Plan policies.
<table>
<thead>
<tr>
<th>Site ref</th>
<th>Site</th>
<th>Allocation</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>PLY58(13)</td>
<td>MDEC Central Park Avenue (SX 47506 55313)</td>
<td>Housing</td>
<td>There are no designated or non-designated heritage assets identified within the site, although the Grade II gatehouse of Devonport Prison stands to the north on the other side of Central Park Avenue. This land abuts the central Plymouth railway station, and in 1856 the site was used as an orchard and nursery, as a stream ran through it, which was associated with a house that was subsequently demolished as part of the widening of Pennycomequick Hill to create Saltash Road, during the post-war period. There is no known archaeology, however, any proposed development would require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.</td>
</tr>
<tr>
<td>PLY58(14)</td>
<td>Open space near Manadon junction (SX 48008 57792)</td>
<td>Sports facilities</td>
<td>There are no designated or non-designated heritage assets in the site itself or in the proximity of the site. Much of this site is part of the Manadon demesne, with part of the Devonport leat running through a section of the site. This site has remained as greenspace since 1870. There is no known archaeology, however, any proposed development would require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.</td>
</tr>
<tr>
<td>PLY58(15)</td>
<td>Savage Road, Barne Barton (SX 44599 57510)</td>
<td>Housing</td>
<td>There are no designated or non-designated structures within the site or in proximity of the site. This site has remained as agricultural land from at least 1895 until it was developed as housing post-war. There is no known archaeology, however, any proposed development would require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.</td>
</tr>
</tbody>
</table>
Site reference: PLY58(16)

**Site:** Bull Point Barracks

**Allocation:** Mixed use refurbishment to provide new homes and employment / training space for local community

**NGR:** SX 43817 57864

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**Site Selection Methodology:**

**Step 1:** Are any heritage assets affected by the potential site allocation?

The site is the Grade II listed Bullpoint Barracks (comprising Block One (former Soldiers' Quarters; Block Two (former Officers' Quarters and the Perimeter wall and attached guard house, magazine, stables, garage and canteen). The barracks was built for the guard of the nearby Bull Point ordnance yard. To the west of the site lies the scheduled Bullpoint gunpowder magazines and camber, which includes a number of listed structures within and just outside its scheduling.

There is no known archaeology, however, any proposed development would require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.

**Step 2:** What contribution does the site make to the significance of the heritage asset?

This is a Grade II listed group of buildings, built in the mid-19th century of English bond red brick with a boundary wall built of Plymouth limestone ashlar and rubble with granite dressings. It is quadrangular in plan with a gateway and it has a number of buildings standing within its parade ground. Any work carried out to this site would need to be carried out sensitively as a result of its listed status and its proximity to the scheduled monument.

**Step 3:** What impact will the site allocation have on that significance?

Bullpoint Barracks has been standing empty for some time and requires careful renovation and maintenance works. The proposal to refurbish this group of buildings is welcomed as long as the conversion is carried out in a sensitive way so as not to substantially harm either the buildings themselves or the barracks as a whole. It is important that if this group of buildings is to be developed then a parking plan needs to be set in place prior to any works on this conversion taking place in order to avoid parking problems as a result of converting a historic building that has limited parking facilities into a viable concern.
Step 4: **What can be done in mitigation to maximise enhancements and avoid harm?**
Any development should be informed by a historic character assessment and form part of the development’s Historic Management Overview to ensure a holistic and co-ordinated approach is established across the site. Because the barracks are protected by a group of listings, all work carried out to it would need to be overseen by the historic environment officers at the Council. All proposals for the conversion of these buildings to mixed use will be scrupulously analysed prior to any planning permission being given to ensure that there will be no/minimal harm to the historic fabric of the building and to the setting of the listed buildings and its adjacent scheduled monument.

Step 5: **Is the proposed site allocation appropriate in light of the NPPF’s tests of soundness?**
The proposed site allocation is to be welcomed in that it seeks to put the barracks to viable use consistent with their conservation and in support with those objectives outlined in Section 12 of the NPPF. This is considered to be a positively prepared allocation and the most appropriate strategy in ensuring sustainable development whilst retaining less than substantial harm to the nearby designated and non-designated heritage assets as long as those issues raised in mitigation are followed. It is considered that the plan will be deliverable over its period and that it not only ensures the method of sustainable development is achievable but is also consistent with the conservation of the designated and non-designated heritage assets in the area in terms of setting and is in line with points 126, 128-136 and 140 of the NPPF and the Local Plan policies.
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</thead>
<tbody>
<tr>
<td>PLY58(17)</td>
<td>Seventrees, Baring Street, Greenbank (SX 48564 54912)</td>
<td>Housing</td>
<td>There are no designated heritage assets within or in the proximity of the site, however, the attractive boundary random rubble walls remain surrounding the area and these should be retained as part of any development. This site abuts Ebrington Street conservation area to the north of Beaumont Park. The site originally comprised Seventrees, a house and associated garden. There is no known archaeology, however, any proposed development would require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.</td>
</tr>
<tr>
<td>PLY58(19)</td>
<td>Weston Mill sports pitches and car park (SX 45555 57603)</td>
<td>Re-provision and enhancement of sports facilities on site with new food retail store as enabling development</td>
<td>This site has remained as part of the mud flats running along the river that fed the Weston Mill stream prior to being reclaimed post war. There are no designated or non-designated heritage assets within the site or within its proximity. There is no known archaeology, however, any proposed development would require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.</td>
</tr>
<tr>
<td>PLY58(20)</td>
<td>Peverell Park (SX 47363 56774)</td>
<td>Enhanced pitch provision</td>
<td>There are no designated or non-designated heritage assets either within or in the proximity of this site. Agricultural land associated with Higher Swilly farm, it became a cricket pitch between 1914 and 1933 but has more recently been unused. There is no known archaeology, however, any proposed development would require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.</td>
</tr>
<tr>
<td>PLY58(21)</td>
<td>Higher Efford pitches, Efford (SX 50203 56604 and 50588 56649)</td>
<td>Sports facilities (playing pitches)</td>
<td>There are no designated or non-designated heritage assets either within or in the proximity of this site. The areas have remained as greenfield sites since at least 1895. There is no known archaeology, however, any proposed development would require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.</td>
</tr>
</tbody>
</table>
Site Selection Methodology:

Step 1: Are any heritage assets affected by the potential site allocation?
There are no designated or non-designated heritage assets within the site itself. However, to the south of the site stands part of the northern defence line of Palmerston forts, specifically the scheduled Woodland Fort that stands 341m to the south east and the scheduled Knowle Battery, which stands a similar distance to the south west. Woodland Wood stands to the south, east and west of the proposed site, and it and its neighbouring Budshead Wood (which is north/north west of Knowle Battery) are both designated local nature reserves.

Step 2: What contribution does the site make to the significance of the heritage asset?
The allocated site remained as agricultural land from 1895 until it was developed post-war. The woods, both Woodland and Budshead, were already established by 1895, with the glacis to the north of Woodland Fort covered in trees at that time. The housing surrounding the two woods are post-war and have, over time, encroached on any formal sight lines laid out around the forts. Given the distance between the site and the heritage assets, and given the established woodlands, which provide screening between the two forts and the site and its neighbouring developments, the proposed allocation is not likely to have a harmful effect on the setting of the heritage assets.

Step 3: What impact will the site allocation have on that significance?
If the proposed housing is sympathetic to existing housing in the area in terms of height and material used, it is considered that there will be negligible impact on the significance of the heritage assets because of development within the proposed site.
Step 4: **What can be done in mitigation to maximise enhancements and avoid harm?**

In terms of mitigation to avoid harm to the scheduled ancient monuments, careful consideration will need to be made to the quality of design, height, use of materials and massing, in order to avoid harm to the remaining heritage assets. In order to ensure that there is the least impact on the two scheduled monuments that are closest to this site, it is imperative that the woodlands are well managed, so that there can be the least amount of harm done to the glacis and the forts themselves as a result of root growth. It would also be of benefit to clear some of the woodland around the glacis in order to enhance that area and re-establish, in part, some of the old sightlines from the fort across the valley in order to maximise enhancements.

Step 5: **Is the proposed site allocation appropriate in light of the NPPF’s tests of soundness?**

This is considered to be a positively prepared allocation and the most appropriate strategy in ensuring sustainable development whilst retaining less than substantial harm to the nearby designated and non-designated heritage assets as long as those issues raised in mitigation are followed. It is considered that the plan will be deliverable over its period and that it not only ensures the method of sustainable development is achievable but is also consistent with the conservation of the designated and non-designated heritage assets in the area in terms of setting and is in line with points 126, 128-136 and 140 of the NPPF and the Local Plan policies.
<table>
<thead>
<tr>
<th>Code</th>
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<th>Use(s)</th>
<th>Details</th>
</tr>
</thead>
<tbody>
<tr>
<td>PLY59(2)</td>
<td>Land either side of Clittaford Road (SX 49147 61096)</td>
<td>Mixed use - housing with small / medium sized food store</td>
<td>This site has remained as agricultural land since 1895, becoming a factory site during the post-war period. There is no known archaeology, however, any proposed development would require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.</td>
</tr>
<tr>
<td>PLY59(3)</td>
<td>Clittaford Road, Southway (SX 49440 61362)</td>
<td>Housing</td>
<td>This site remained as agricultural land from at least 1895 until becoming an Electrical Distribution site during the post-war era. There is no known archaeology, however, any proposed development would require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.</td>
</tr>
<tr>
<td>PLY59(4)</td>
<td>Former Southway Primary School playing fields (SX 48124 60829)</td>
<td>Housing</td>
<td>Although there are no designated heritage assets within this site or in its proximity, there are within the site the church, the Catholic Church of St Thomas More, and a youth centre behind it to the north, both providing community assets to the area. This site has been remained as greenspace since at least 1895. There is no known archaeology in the area, however, any proposed development would require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.</td>
</tr>
<tr>
<td>PLY59(5)</td>
<td>Stirling House &amp; Honicknowle Clinic, Honicknowle Green (SX 46768 58945)</td>
<td>Housing</td>
<td>There are no designated or non-designated heritage assets within the site. It is however 56m from the walling surrounding the Grade II listed Warwick Park House. This is a brownfield site currently owned by Stirling House within a housing estate with an area of green providing an attractive setting for the historic building. There is no known archaeology, however, any proposed development would require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.</td>
</tr>
<tr>
<td>PLY59(6)</td>
<td>Toshiba Site, Ernesettle Lane, Ernesettle (SX 44757 60113)</td>
<td>Mixed use - hotel / housing</td>
<td>There are no designated or non-designated heritage assets within the site itself. The old Brown and Sharps Factory site, this area was agricultural land from at least 1895 until post-war. The nearest significant heritage assets are the scheduled Ernesettle Battery and the Grade II* St Budeaux Church. Due to the distance from the site and the heavy screening effect of the wooded embankment and the topography of the area it is considered that the impact on setting of the site upon the church and scheduled monument may</td>
</tr>
</tbody>
</table>
be classed as negligible. As part of any future EIA, any proposal should be assessed in terms of ‘impact upon setting’ by virtue of its appearance within an area of theoretical visibility. There is no known archaeology, however, any proposed development would require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.

| PLY59(7) | Land South of Langley Crescent, Southway (SX 49002 61259) | Housing | There are no designated or non-designated heritage assets within or in the proximity of the site. This site has remained as agricultural land since at least 1895. There is no known archaeology, however, any proposed development would require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation. |
| PLY59(8) | Land off Tamar Way (SX 46220 58799) | Housing | There are no designated or non-designated heritage assets within or in the proximity of the site. It was historically a piece of agricultural land since at least 1895, which now abuts the A38. There is no known archaeology, however, any proposed development would require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation. |
| PLY59(9) | Southway Campus, Clittaford Road (SX 48645 60990) | Housing | There are no designated or non-designated heritage assets within or in the proximity of the site. This site, part of the Beechwood Primary School site, was agricultural land from at least 1895 until the post-war period. There is no known archaeology, however, any proposed development would require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation. |
Site Selection Methodology:
Step 1: **Are any heritage assets affected by the potential site allocation?**
There are no designated or non-designated heritage assets within the site itself. The scheduled Knowle Battery is 227m to the south of the site and the north side of its glacis is covered by Budshhead Wood Local Nature Reserve. The scheduled Agaton Fort is 739m to the south west. The nearest listed building are the remains of the Grade II Budshhead Manor and its associated outbuildings, which lie 473m to the north west, on the other side of Budshhead Creek. This area shows as agricultural land on the 1895 OS map, south east of Woodvale Cottage and flanked on its south west side by Budshhead Creek, however, the site is currently being used as a Breakers Yard. It is unclear whether the boundary hedges are of significance but these may well be considered as non-designated heritage assets.

There is no known archaeology, however, any proposed development would require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.

Step 2: **What contribution does the site make to the significance of the heritage asset?**
It is not considered that the site makes any contribution to the significance of any of the adjacent heritage assets. The glacis surrounding Knowle Battery remains predominantly as woodland other than a crescent of buildings wrapped around it to the immediate north of the battery itself, with most of the land to the north of the glacis covered in trees across to Budshhead Creek. In terms of Budshhead Manor, it is likely that the site allocation was part of the Manor’s land but it is sufficiently distant to make no contribution to the heritage asset’s significance, particularly since much of the intervening land is subsequently been built upon. The proposed site is a narrow area of land at the edge of an existing housing estate alongside the Creek.
Step 3: What impact will the site allocation have on that significance?
The north side of the glacis has already been built upon, with a row of houses looking across Budshead Wood towards the site. Agaton Fort, too, is surrounded by housing. It is unlikely that there will be an impact on the heritage assets including their setting as a result of the site allocation.

Step 4: What can be done in mitigation to maximise enhancements and avoid harm?
There is no known archaeology in the area, and therefore an archaeological desk-based assessment and possible field evaluation would be required to inform of the long term use of this area prior to 1895.

Step 5: Is the proposed site allocation appropriate in light of the NPPF’s tests of soundness?
This is considered to be a positively prepared allocation and the most appropriate strategy in ensuring sustainable development whilst retaining less than substantial harm to the nearby designated and non-designated heritage assets as long as those issues raised in mitigation are followed. It is considered that the plan will be deliverable over its period and that it not only ensures the method of sustainable development is achievable but is also consistent with the conservation of the designated and non-designated heritage assets in the area in terms of setting and is in line with points 126, 128-136 and 140 of the NPPF and the Local Plan policies.

In terms of the historic hedgerows, these are seen as making an important contribution to the character of an area and may be historically (and archaeologically) important as indicators of land use and previous ownership. They also contribute to biodiversity, providing wildlife corridors through built up areas. As a result the hedgerows abounding this site are considered as heritage assets and should be retained as part of any proposed development.
Site reference: PLY59(11)

Site: Land West of Ernesettle Lane

Allocation: Enhancement and delivery of new playing pitch facilities

NGR: SX 44756 59516

Site Selection Methodology:
Step 1: Are any heritage assets affected by the potential site allocation?
Although there are no designated heritage assets within this site, it stands 119m away from the scheduled western part of Ernesettle Battery, 404m away from the eastern part of Ernesettle Battery, which runs to the north of St Budeaux churchyard’s boundary and 563m from the scheduled Agaton Fort to the east. The nearest listed building is the Grade II* listed St Budeaux church, which is 534m away from the site. The land remained as agricultural land since at least 1895 until it was turned into sports pitches during the post-war period, and it is likely that the remaining hedgerows abounding this site are historic and therefore these would be considered as non-designated heritage assets.

There is no known archaeology, however, any proposed development would require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.

Step 2: What contribution does the site make to the significance of the heritage asset?
Although this site is not part of the scheduling, it does stand on the slope running north from Ernesettle Battery and its associated extension to the east. Therefore the site does contribute to the significance of the heritage asset.

Step 3: What impact will the site allocation have on that significance?
It is not considered that there will be a detrimental impact of the site allocation on the significance of the heritage asset because the land is already allocated as a sports pitch and therefore its continued allocation is acceptable. Also, by allocating it as a sports field it means that this area of land will remain as a Greenfield site and therefore will continue to provide a positive contribution to the surrounding heritage assets.
Step 4: **What can be done in mitigation to maximise enhancements and avoid harm?**

It is not considered that any enhancements would be required in this case given that the area is already used for sports facilities, however given that the hedgerow boundaries of the site could be historic; these should be retained and maintained properly. Because of its current use, there is unlikely to be any additional harm caused to the nearby scheduled monuments or listed buildings. If, however, the decision is to create a pitch that can be used at night time, including lighting then we would expect the planning department and the HE officers to be involved regarding the style/heights of any lights used in order to ensure that there is minimal impact on the heritage assets. In this case, as part of any future EIA, any proposal should be assessed in terms of 'impact upon setting' by virtue of its appearance within an area of theoretical visibility.

Step 5: **Is the proposed site allocation appropriate in light of the NPPF’s tests of soundness?**

This is considered to be a positively prepared allocation and the most appropriate strategy in ensuring sustainable development whilst retaining less than substantial harm to the nearby designated and non-designated heritage assets as long as those issues raised in mitigation are followed. It is considered that the plan will be deliverable over its period and that it not only ensures the method of sustainable development is achievable but is also consistent with the conservation of the designated and non-designated heritage assets in the area in terms of setting and is in line with points 126, 128-136 and 140 of the NPPF and the Local Plan policies.

In terms of the historic hedgerows, these are seen as making an important contribution to the character of an area and may be historically (and archaeologically) important as indicators of land use and previous ownership. They also contribute to biodiversity, providing wildlife corridors through built up areas. As a result the hedgerows abounding this site are considered as heritage assets and should be retained as part of any proposed development.
Site reference: PLY59(12)

Site: Fields to north of St Budeaux A38 junction

Allocation: Housing

NGR: SX 45297 59410

Site Selection Methodology:

Step 1: Are any heritage assets affected by the potential site allocation?
Although there are no designated heritage assets within the site, it abuts the Ernesettle Battery east extension that runs along the north side of St Budeaux churchyard and is 42m (at its eastern point) from the scheduled Agaton Fort to the north east. The nearest listed buildings are the Grade II* listed St Budeaux church and the Grade II Agaton Farmhouse. Additionally the proposed site will have an impact on the Ernesettle housing estate, which has been identified as a prime example of post-war suburban housing. The area has remained as agricultural land since at least 1894 and it is therefore likely that the hedgerows in the area are historic, as such they would be considered to be non-designated heritage assets.

There is no known archaeology, however, any proposed development would require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.

Step 2: What contribution does the site make to the significance of the heritage asset?
The site is considered to make a contribution to the setting of the heritage assets and therefore the allocation could cause substantial harm to the scheduled monument and listed buildings abutting the site.
Step 3: What impact will the site allocation have on that significance?
There could be a significant impact on the scheduled monument to which the site abuts should the proposed allocation be approved.

Step 4: What can be done in mitigation to maximise enhancements and avoid harm?
In terms of the scheduling the site allocation would abut it. It is suggested that the southern boundary of the allocation be curtailed to ensure that an appropriate buffer is established, by moving it substantially northwards so that the space in front of the scheduling is not built upon, and indeed is retained as a piece of greenspace ensuring that the adjoining heritage assets are not harmed in any way. As part of any future EIA, any proposal should be assessed in terms of ‘impact upon setting’ by virtue of its appearance within an area of theoretical visibility. This buffer edge should be assured, so that no future development is proposed any closer to the scheduling so that, certainly in part, the setting of it and the Grade II* St Budeaux church is unimpeded by the proposed housing development. Since the hedgerow boundaries on the site are likely to be historic, these should be retained and maintained properly.

In terms of the post-war housing development, it is evident that the post-war housing estate was built to follow the contours of the land and through a similar method, style and design it may be possible to incorporate additional housing that would integrate well into that already existing.

In terms of the archaeology, a desk-based archaeological assessment would be required as part of any proposed development and an evaluation of the impact on any archaeology found would be made as a result of this.

Step 5: Is the proposed site allocation appropriate in light of the NPPF’s tests of soundness?
With regard to the NPPF statement in terms of a ‘presumption in favour of sustainable development’, it is considered that the proposed site allocation would need to propose mitigation measures if development was to be considered acceptable. This should include shifting the southern boundary of the allocated site further northwards away from the scheduling and an analysis of the archaeological desk-based assessment prior to any approval in case any archaeology is identified below ground then it may be that the proposal would be considered to be acceptable.

In terms of the historic hedgerows, these are seen as making an important contribution to the character of an area and may be historically (and archaeologically) important as indicators of land use and previous ownership. They also contribute to biodiversity, providing wildlife corridors through built up areas. As a result the hedgerows throughout this site are considered as heritage assets and should be retained as part of any proposed development.
Site Selection Methodology:

Step 1: Are any heritage assets affected by the potential site allocation?
Although there are no designated heritage assets within this brownfield site, the Grade II* St Budeaux Church 60m and Ernesettle Battery 95m stand to the north west. Abutting part of the military road adjoining Agaton Fort and Ernesettle Battery. Agricultural land since at least 1895, it was developed for housing post-war, but demolished during the work to develop the A38.

There is no known archaeology, however, any proposed development would require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.

Step 2: What contribution does the site make to the significance of the heritage asset?
This is a brownfield site that stands to below the level of the Grade II* listed church, and therefore the church overlooks it and as such is part of its setting.

Step 3: What impact will the site allocation have on that significance?
The impact of the proposal may have significant harm on the designated heritage asset unless it is sympathetically composed within the existing site.

Step 4: What can be done in mitigation to maximise enhancements and avoid harm?
It is important that a well-conceived and well-designed development is built on this site, which is sympathetic to the setting of the designated heritage asset nearby. Careful consideration will need to be made to the quality of design, height, use of materials and massing, in order to avoid harm to the asset. By retaining much of the tree growth and hedges surrounding this site, it will also ensure that the impact of the developments on the setting of heritage asset would be reduced. Considering all these mitigating factors will ensure that the potential substantial harm to the heritage asset will be reduced.
Step 5: **Is the proposed site allocation appropriate in light of the NPPF’s tests of soundness?**

Whilst this site allocation is considered to feasible and an appropriate strategy in ensuring sustainable development, it is important that in order to avoid substantial harm to the nearby designated heritage asset, if the mitigating factors are accepted, then the potential substantial harm to the heritage asset will be reduced. It is considered that the plan will be deliverable over its period and that it will ensure the method of sustainable development is achievable but is also consistent with the conservation of the non-designated heritage asset in the area in terms of setting and is in line with points 126, 128-136 and 140 of the NPPF and the Local Plan policies.
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<tr>
<th>Site ref</th>
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<tbody>
<tr>
<td>PLY59(14)</td>
<td>Land North of Clittaford Road (SX 49094 61173)</td>
<td>Housing</td>
<td>There are no designated or non-designated heritage assets within or in the proximity of the site. This site has remained as agricultural land since at least 1895. There is no known archaeology, however, any proposed development would require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.</td>
</tr>
<tr>
<td>PLY59(16)</td>
<td>Land between 140 and 150 Dunraven Drive, Derriford (SX 48965 60499)</td>
<td>Housing</td>
<td>There are no designated or non-designated heritage assets either within or in the proximity of this site. This land appears as agricultural land on the 1895 OS map, with the adjoining land developing as housing during the post-war era. The land has remained as greenspace, and to the south Southway Woods Local Nature Reserve. There is no known archaeology, however, any proposed development would require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation. The whole of the woodland to the rear of this site is covered by a TPO.</td>
</tr>
<tr>
<td>PLY59(17)</td>
<td>Whitleigh Community Centre (SX 47345 59858)</td>
<td>Housing</td>
<td>There are no designated or non-designated heritage assets within or in the proximity of this site. This site appears to have been a small woodland, surrounded by agricultural land as seen on the 1895 OS map. Although there is no known archaeology, any proposed development would require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.</td>
</tr>
<tr>
<td>PLY59(18)</td>
<td>Chaucer Way School (SX 47299 58500)</td>
<td>Housing</td>
<td>There are no designated or non-designated heritage assets within or in the proximity of this site. The site appears to have been agricultural land as seen on the 1895 OS map until the post-war period when it was developed into the Chaucer Primary School. Although there is no known archaeology, any proposed development would require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.</td>
</tr>
<tr>
<td>PLY59(19)</td>
<td>Former Lakeside Residential home (SX 45510 60123)</td>
<td>Housing</td>
<td>Whilst there are no designated heritage assets within or in the proximity of this site, the site itself stands within the Ernesettle suburb, designed as part of the Abercrombie and Paton Watson 1943 plan for the suburbs. Thus any proposed housing layout within this site should respect the existing layout of the area, which follows a circular format,</td>
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so that it is not at odds, and causes harm, to the layout of this suburb. Although there is no known archaeology, the site stands 251m to the south west of the remains of Budshead Manor, a 16\textsuperscript{th} century manor house, and as such there may be some archaeological significance in the area, therefore any proposed development would require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.

| PLY60(1) | Land at Redwood Drive, Chaddlewood (SX 55941 56459) | Housing | There are no designated or non-designated heritage assets within or within the proximity of the site. The site, which is due to be developed shortly, appears to have been agricultural land since at least 1841 Tithe map. Although there is no known archaeology, there do appear to be anomaly groups identified as part of the geophysical survey and as a result a desk-based assessment and trial trench evaluation has been requested, prior to any work being started on this site. |

| PLY60(2) | Downham School, Plymstock (SX 51558 53062) | Housing | This site is currently being developed as approval of application 15/01520/FUL. Although there are no designated or non-designated heritage assets within the site allocation, there are a number of listed buildings overlooking the site. The site was an orchard connected to the Grade II listed Downham Farm (developed on the site of an earlier religious house), to the south east, prior to being developed post-war to a school. There are a number of listed buildings surrounding the site, all of which are part of the medieval settlement of Plymstock. There is no known archaeology although given that this is part of the medieval settlement of Plymstock there is high archaeological potential. |
Site Selection Methodology:

Step 1: Are any heritage assets affected by the potential site allocation?
This site is currently in the process of being developed as part of Planning application 16/01595/FUL and the historic environment officers have provided consultation responses to the proposals to ensure that the significance of the heritage assets have been recognised. Whilst there are no designated heritage assets within the site itself, there are a number of listed buildings to the south and south east of it on Underwood Road. There are also the scheduled remains of Plympton Priory to the north east of the site along with the associated Grade II listed Tower House. There are also a number of non-statutory heritage assets, including the random rubble walls that surround this site.

The land of Plympton Priory is known to have covered the whole of this area, and therefore the archaeological potential is likely to be high.

Step 2: What contribution does the site make to the significance of the heritage asset?
Currently the contribution that the site makes to understanding Plympton Priory in particular is unknown. The buildings that at present stand on this now obsolete hospital location were built in the 1980s (?) and have little respect for the area in terms of layout, material used and design. The layout is relatively loose with a number of car parking spaces surrounding the buildings. An archaeological trench evaluation has been called for as part of a stage programme of archaeological work within a condition to be applied should permission for Planning application 16/01595/FUL be granted.
Step 3: **What impact will the site allocation have on that significance?**

Again, it is difficult to know what impact the site allocation would have on the non-designated heritage assets around this site, and therefore a thorough archaeological investigation would be required in order to ensure that any archaeology found would be assessed for its significance. In terms of the allocation itself, there are a number of new housing estates within the area and it is not considered that they have had a detrimental impact on the existing heritage assets. Since this site is tucked behind existing housing, it is unlikely to have a harmful impact on the setting of the Plympton Priory remains.

Step 4: **What can be done in mitigation to maximise enhancements and avoid harm?**

Mitigation would require a staged programme of archaeological work (including trench evaluation) as mitigation and under condition should permission for development of the site be granted.

Step 5: **Is the proposed site allocation appropriate in light of the NPPF’s tests of soundness?**

This is considered to be a positively prepared allocation and the most appropriate strategy in ensuring sustainable development whilst retaining less than substantial harm to the nearby designated and non-designated heritage assets as long as those issues raised in mitigation are followed. It is considered that the plan will be deliverable over its period and that it not only ensures the method of sustainable development is achievable but is also consistent with the conservation of the designated and non-designated heritage assets in the area in terms of setting and is in line with points 126, 128-136 and 140 of the NPPF and the Local Plan policies.

If, as a result of the research, any evidence of the sea wall and associated structures for Plympton Priory are discovered then a decision about how it could be retained within the development would need to be explored.
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<tr>
<td>PLY60(4)</td>
<td>Land at Staddiscombe Road/Goosewell Road (SX 51940 51816)</td>
<td>New playing pitch as part of wider sports hub</td>
<td>There are no designated or non-designated heritage assets within or in proximity to the site. The area has remained as agricultural land since at least 1895. The proposal is to retain this space as a sports grounds. There is no known archaeology in the area, however, any proposed below ground works would require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.</td>
</tr>
</tbody>
</table>
Site reference: PLY60(7)

Site: Land between Undercliff Road and Barton Road, Turnchapel

Allocation: Housing

NGR: SX 49637 53122

Site Selection Methodology:
Step 1: Are any heritage assets affected by the potential site allocation?
Although there are no designated heritage assets within the site itself, there is the Grade II listed Mansion House and the adjacent Grade II listed 2-12 Boringdon Terrace to the south west of the site. There are also a number of non-designated heritage assets associated with this site including random rubble walls that surround part of it, gate piers and a number of war department boundary stones. The Turnchapel conservation area lies to the south west, reflecting part of the fishing village and post-medieval shipbuilding industry. There is also part of the old tramway track that led down to Turnchapel Wharves from the quarry to the south, with the tunnel archway leading out onto the proposed site from beneath Undercliff Road. This site has already been partially developed (Planning application 16/00362/FUL) and the historic environment officers have provided consultation responses to the proposals to ensure that the significance of the heritage assets have been recognised. There is no known archaeology.

Step 2: What contribution does the site make to the significance of the heritage assets?
In terms of how the site developed during the 19th century, the non-designated heritage assets do contribute to that understanding. The survival of the tunnel entrance leading out beneath Undercliff Road has been a positive find, hidden as it was, by the growth of a small group of trees along its embankment. These heritage assets have been identified as of being of sufficient significance that negotiations have been made to retain as much of the survival as possible within the new housing development. The impact of the development on the designated heritage assets to the west of the site should not be detrimental in that the topography and the remaining historic walling surrounding the site ensures that only a minimal amount of the new development will be visible from the listed buildings.
Step 3: **What impact will the site allocation have on that significance?**
The impact of the development on the listed buildings is not considered to be detrimental as the topography and existing stone walls ensures that much of it is not visible from the designated heritage assets and the use of materials within the new development itself are sympathetic to those already existing within the Conservation Area as a whole. As long as the development continues to retain that sympathy in terms of design, materials used and layout, there should be little impact on the significance of the remaining heritage assets.

Step 4: **What can be done in mitigation to maximise enhancements and avoid harm?**
Careful consideration will need to be made to the quality of design, height, use of materials and massing, in order to avoid harm to the assets. The old tramway, its embankment and tunnel entrance have all been retained, in part as a small community park, within the proposed development and the existing walls, gate piers and boundary stones will remain in situ around the site ensuring that these heritage assets contribute to the ‘sense of place’.

Step 5: **Is the proposed site allocation appropriate in light of the NPPF’s tests of soundness?**
This is considered to be a positively prepared allocation and the most appropriate strategy in ensuring sustainable development whilst retaining less than substantial harm to the nearby designated and non-designated heritage assets as long as those issues raised in mitigation are followed. It is considered that the plan will be deliverable over its period and that it not only ensures the method of sustainable development is achievable but is also consistent with the conservation of the designated and non-designated heritage assets in the area in terms of setting and is in line with points 126, 128-136 and 140 of the NPPF and the Local Plan policies.
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<tbody>
<tr>
<td>PLY60(8)</td>
<td>Errill Retail Park, Plymouth Road (SX 53040 56463)</td>
<td>Housing</td>
<td>There are no designated or non-designated heritage assets within or in the proximity of the site. This site was originally part of the embankment abutting the Great Western Railway to the south. There is no known archaeology, however, any proposed development would require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation. Constraints include a number of tree protection orders and Flood Risk 3.</td>
</tr>
<tr>
<td>PLY60(9)</td>
<td>Land at Plympton House (SX 54696 55951)</td>
<td>Housing with open space and improvements</td>
<td>This site is currently in the process of being developed as part of Planning application 16/01595/FUL and the historic environment officers and Historic England have provided consultation responses to the proposals to ensure that the significance of the heritage assets have been recognised. This site is all within the parkland area surrounding the Grade I Plympton House. Part of this site is also a Grade II Registered Park. There are also a number of the Grade II listed structures, specifically the boundary and kitchen walls, which stand within and wrap around the site. The area also stands with the Plympton St Maurice conservation area and is covered by a Tree Preservation Order.</td>
</tr>
<tr>
<td>PLY60(10)</td>
<td>Land off Newnham Road, Colebrook (SX 54246 56911)</td>
<td>Housing</td>
<td>There are no designated or non-designated heritage assets within or in the proximity of the site. It was originally part of the village of Colebrook, with at the east of the site, part of the Colebrook House estate (agricultural land), but post-war the area was developed for industrial depot use. There is no known archaeology, however, any proposed development would require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.</td>
</tr>
</tbody>
</table>
Site Selection Methodology:

Step 1: Are any heritage assets affected by the potential site allocation?
Although there are no designated or non-designated heritage assets within the site itself, it abuts the scheduled post-medieval deer park, medieval fish pond, 18th century triumphal arch and a 19th century lead mine, ore works and smelt mill to the north east. The Boringdon Arch (Triumphal Arch) and Triumphal Arch Cottage and outbuilding are also listed at Grade II*. The whole area was part of the Boringdon Park, with this site remaining as agricultural land since at least 1895.

There is no known archaeology, however, any proposed development would require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.

Step 2: What contribution does the site make to the significance of the heritage asset?
The site is currently greenspace and is part of the setting of the surrounding heritage assets.

Step 3: What impact will the site allocation have on that significance?
It is unlikely that harm will be caused to the scheduled monuments as a result of the site allocation for sports facilities. However, great care must be taken if there is any proposal to create a pitch that can be used at night time, including lighting then we would expect the planning department and the HE officers to be involved regarding the style/heights of any lights used in order to ensure that there is minimal impact on the heritage assets.

Step 4: What can be done in mitigation to maximise enhancements and avoid harm?
Full information about whether there would be a requirement to level the land and this may well cause significant harm to the surrounding scheduling. Trees and hedges surrounding the site would ensure that the impact of the allocation through the use of appropriate screening would cause less harm to the assets.
Step 5: **Is the proposed site allocation appropriate in light of the NPPF’s tests of soundness?**

This is considered to be a positively prepared allocation and the most appropriate strategy in ensuring sustainable development whilst retaining less than substantial harm to the nearby designated and non-designated heritage assets as long as those issues raised in mitigation are followed. It is considered that the plan will be deliverable over its period and that it not only ensures the method of sustainable development is achievable but is also consistent with the conservation of the designated and non-designated heritage assets in the area in terms of setting and is in line with points 126, 128-136 and 140 of the NPPF and the Local Plan policies.
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<tbody>
<tr>
<td>PLY60(12)</td>
<td>Land east of Bell Close (SX 54895 57189)</td>
<td>Employment</td>
<td>This site stands to the edge of Plymouth City Council’s city boundary and it is noted that the medieval and listed Old Newnham Farm estate stands 160m to the north east. Thus although there are no designated or non-designated heritage assets within the site itself, any proposed development needs to be sensitively developed so that it does not substantially harm the setting of the listed buildings. Within the site itself, the land has remained as agricultural since at least 1895 according to the OS map. There is no known archaeology, however, any proposed development would require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.</td>
</tr>
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</table>
Site reference: TTV6

Site: Noss on Dart, Kingswear
Allocation: Mixed use
NGR: SX 881 528

Site Selection Methodology:
Step 1: Are any heritage assets affected by the potential site allocation?
- Two D-Day landing craft maintenance sites, Grade not applicable (List UID: 1021076 and 1020912)
- Bathhouse and adjoining boathouse meters south east of Greenway House, Grade II (List UID: 1108549)
- Historic Park and Garden, Greenway, Grade II (List UID: 1001686)
- Britannia Royal Naval College, main college and attached walls, Grade II* (List UID: 1208626)
Step 2: **What contribution does the site make to the significance of the heritage asset?**
The setting of the D-Day landing craft maintenance sites can be considered to be the River Dart and its foreshore. Whilst there is no inter-visibility, the locations of the assets and the allocation can be seen in the same view from points on the west side of the River and from open land, including a public footpath to the west. Partly submerged (depending on phase of tide), the relationship between the site and the assets would not be appreciated by the casual observer.

The bathhouse sits on the foreshore of the River to the north and out of sight (round a bend in the River) from the allocation site. There is no inter-visibility, but the sites would be seen in sequence by anyone travelling along the River. The site has a long history of maritime-related commercial activity and buildings and the cumulative and sequential impact is one of experiencing the historical development and heritage of Dartmouth.

There is some inter-visibility with both Greenways Park and Gardens, which lies to the north, and with the Naval College, which lies to the south west. This is limited, particularly to the casual observer. Given the local topography the three locations together, and in distant views, form a panoramic view that is important in experiencing the historical development and heritage of Dartmouth.

Step 3: **What impact will the site allocation have on that significance?**
The site is currently developed and the extent, form and nature of development are a familiar presence in the town / landscape. Redevelopment has the potential to change the relationship. A well thought out scheme has the potential to enhance the setting of the heritage assets (in their widest interpretation) whereas over-development and poor design could have an adverse impact.

Step 4: **What can be done in mitigation to maximise enhancements and avoid harm?**
It would be a requirement of a planning application would to combine a thorough study of the landscape, the historic landscape and heritage, both designated and non-designated assets.

This would inform the mix of development, the extent, layout, form and design as well as the materials to be used. It would be a requirement to prepare a design code with parameters.

In this way, it is considered possible to avoid adverse impacts on heritage as well as providing the opportunity to substantially improve interpretation of the history of the site and the wider historic environment at this part of the River Dart.

Step 5: **Is the proposed site allocation appropriate in light of the NPPF’s tests of soundness?**
When detailed planning applications within the allocated site are brought forward, this will provide adequate opportunity for the potential impact on those assets and their setting to be considered in more detail, to identify and implement specific opportunities to enhance those assets, and a strategy, where relevant, for conservation and enjoyment of such (NPPF 126, 129, 131-135, 137, 139, 141).
Site Selection Methodology:

Step 1: Are any heritage assets affected by the potential site allocation?
The following assets have been identified.
- Stowford Paper Mills, Grade II (List UID: 1107427)
- Stowford Manor, Grade II (List UID: 1393178)
- Ivybridge viaduct including adjacent piers of earlier viaduct, Grade II (List UID: 1325418)

Step 2: What contribution does the site make to the significance of the heritage asset?
The site is the former paper mill and includes this designated asset and related structures and functions that are also of significant heritage interest, including a leat, open space and a walled garden that hosts two greenhouses and with an adjacent derelict building.

Stowford Manor sits above the site, to the east. Whilst now in separate ownership, the historic link between this, the mill owner’s house, and the allocation site remains clear.

The northern part of the site sits beneath the impressive railway viaduct, which carries the main railway line over the River Erme valley and can be seen together with the mill chimney from distant views to the south.
Step 3: **What impact will the site allocation have on that significance?**
The mill is in a serious state of disrepair having fallen into disuse some ten years ago. Once the vibrant heart of working Ivybridge, sensitive redevelopment has the potential for significant benefits.

Step 4: **What can be done in mitigation to maximise enhancements and avoid harm?**
Planning permission (reference 27/1336/15/F) was granted 18/02/2016. This was accompanied by a Heritage Assessment and considers both designated and non-designated assets that would be affected by the development.

The careful restoration and recording of the mill and its associated land is a requirement of the condition of the planning permission.

The mix of development, the extent, layout, form and design as well as the materials to be used are controlled by a design code with parameters.

In this way, it is considered possible to mitigate impacts on heritage as well as providing the opportunity to substantially improve interpretation of the history of the site.

Step 5: **Is the proposed site allocation appropriate in light of the NPPF’s tests of soundness?**
As detailed planning applications within the allocated site are brought forward, this will provide adequate opportunity for the potential impact on those assets and their setting to be considered in more detail, to identify and implement specific opportunities to enhance those assets, and a strategy, where relevant, for conservation and enjoyment of such (NPPF 126, 129, 131-135, 137, 139, 141).
Site Selection Methodology:

Step 1: Are any heritage assets affected by the potential site allocation?
- Westover Farmhouse, Grade II (List UID: 1325408)

Step 2: What contribution does the site make to the significance of the heritage asset?
The listing for this asset describes its 17th Century origins and architectural merits. Bound by roads and development on all sides, the setting of the asset beyond its immediate curtilage has been compromised almost completely.

The allocation lies above the asset and on the other side of a road, with intervening trees that provide further screening. The site is developed on its upper, more distant, part and is used as a car park in its lower part. Inter-visibility with the latter, less developed part of the site is very limited, such that the impact on the setting is not significant.

Step 3: What impact will the site allocation have on that significance?
The site is already partly developed, with the ‘undeveloped’ area used for car parking. Development of the site would have a very limited impact on the heritage asset identified.

Step 4: What can be done in mitigation to maximise enhancements and avoid harm?
Whilst the impact is likely to be limited, development would need to be an appropriate layout, scale and design and use appropriate materials within the context of the character of the setting.

Step 5: Is the proposed site allocation appropriate in light of the NPPF’s tests of soundness?
When detailed planning applications within the allocated site are brought forward, this will provide adequate opportunity for the potential impact on those assets and their setting to be considered in more detail, to identify and implement specific opportunities to enhance those assets, and a strategy, where relevant, for conservation and enjoyment of such (NPPF 126, 129, 131-135, 137, 139, 141).
Site Selection Methodology:

Step 1: **Are any heritage assets affected by the potential site allocation?**
- Kingsbridge and Dodbrooke War Memorial, Grade II (List UID: 1433998)
- Windsor Lodge, Grade II (List UID: 1325384)
- Victoria Place, Grade II (List UID: 1249488)
- Pindar Lodge, Grade II (List UID: 1249461)
- Warehouse occupied by Bonwitco, Grade II (List UID: 1317303)
- South place, Grade II (List UID: 1263739)
- Conservative Club, Grade II (List UID: 1249448)
- Leighton House, Grade II (List UID: 1263734)

Step 2: **What contribution does the site make to the significance of the heritage asset?**
The immediate setting of the heritage assets identified above is as part of a quintessential traditional rural urban environment. Views between the site and the heritage assets are currently limited by separation distances, intervening buildings and mature trees along the Quayside.

With specific reference to the Dodbrooke war memorial, the site makes a contribution to the significance of that heritage asset in that it allows public access to and enjoyment of the asset in an open setting with the backdrop of a row of significant mature trees on the opposite side of the river.

Step 3: **What impact will the site allocation have on that significance?**
The height of new development and impact on existing tree coverage will determine the extent of the impact the site may have on the significance of heritage assets.
Step 4: **What can be done in mitigation to maximise enhancements and avoid harm?**
Maintaining mature trees and restricting height of new buildings to below tree level will avoid harm to heritage assets, which might be caused by eroding the natural setting and screening properties of the existing trees. The Quayside Leisure Centre is a large building currently effectively screened by the promenade of trees. Its reveal would alter the backdrop and potentially the enjoyment of the Dodbrooke war memorial on the opposite side of the estuary.

Step 5: **Is the proposed site allocation appropriate in light of the NPPF’s tests of soundness?**
The scope for this allocation to have a detrimental impact on significance of heritage assets will depend largely on the retention of the mature trees and the scale and design of development within the site. New buildings should be restricted in height to avoid dominating the rural waterside character of the setting of the monument. When detailed planning applications are brought forward, this will provide further opportunity for the potential impact on this asset and its setting to be considered, and a strategy for conservation and enjoyment of such (NPPF 126, 129, 131-135, 137, 139, 141).
Site reference: TTV15 (2)

Site: Land north-west of Kingsbridge

Allocation: Housing

NGR: SX 7351 4381

Site Selection Methodology:

Step 1: Are any heritage assets affected by the potential site allocation?
- Former Workhouse, Grade II (List UID: 1249505) is located approximately 200m south-east of the allocated site

While there are a number of identifiable heritage assets, both designated and non-designated, the potential impact of development on those buildings and their settings is limited due to the lack of intervisibility between them and the site.

Step 2: What contribution does the site make to the significance of the heritage asset?
The site makes no easily identifiable contribution to the significance of the heritage assets due to the lack of intervisibility.

Step 3: What impact will the site allocation have on that significance?
Due to limited intervisibility and limited contribution to significance, the impact of the site on the significance is limited. Any impact would only be clearly identifiable at detailed application stage.

Step 4: What can be done in mitigation to maximise enhancements and avoid harm?
For the reasons set out above, options for mitigation to maximise enhancements and avoid harm would only become clear at detailed application stage when impact on significance can more clearly be identified.

Step 5: Is the proposed site allocation appropriate in light of the NPPF’s tests of soundness?
When detailed planning applications within the allocated site are brought forward, this will provide adequate opportunity for the potential impact on those assets and their setting to be considered in more detail, to identify and implement specific opportunities to enhance those assets, and a strategy, where relevant, for conservation and enjoyment of such (NPPF 126, 129, 131-135, 137, 139, 141).
Site Selection Methodology:

Step 1: Are any heritage assets affected by the potential site allocation?

- Cornwall and West Devon Mining Landscape (World Heritage Site inscribed by the World Heritage Committee of UNESCO in 2006).
- Bank with attached cart shed about 20m west of Crowndale GV II. Group of farm buildings including range of stabling with attached cattle shed, dung pit and bank with attached cart shed about 20m west of Crowndale (Grade II)
- Tavistock Hamlets SX 47 SE 6/123 - Group of farm buildings including - range of stabling with attached cattle shed and dungpit
- Disused railway line is a Conservation Area.
- Mining feature to south
Step 2: **What contribution does the site make to the significance of the heritage asset?**

A heritage assessment was submitted with the outline planning application.

The eastern boundary of much of the proposal site is represented by the Tavistock canal, which is an important element of the Cornwall and West Devon Mining Landscape WHS. Much of the town of Tavistock is part of the WHS and is also designated as a Conservation Area that extends to within 400m of the site.

A former copper mine is located just to the south of the site and forms part of the setting of the WHS. The mine is also part of the setting of the Crowndale Farm, a cluster of buildings on the opposite side of the canal, of which two are Listed Buildings (both Grade II) and which is the probable birthplace of Sir Francis Drake.

The proposal is bisected by a former railway linking Tavistock to Plymouth via Bere Alston. This was constructed in 1890 and closed in 1968. It is now designated as a Conservation Area. Other listed buildings in the vicinity of the site include the Church of Our Lady and St Mary Magdelene on Callington Road (Grade II*), two groups of 19th Century model cottages (Fitzford Cottages and Westbridge Cottages, both Grade II), a stone-built well-house (Grade II), a gatehouse (Grade II) and a statue of Sir Francis Drake (Grade II).

High potential exists for archaeological remains.

We are aware that the site is in the Tavistock Masterplan SPD. Nonetheless the site is adjacent to a number of listed buildings at Crowndale Farm, the setting of which may be impacted upon.

Step 3: **What impact will the site allocation have on that significance?**

The proposed development (outline planning permission), without mitigation, has the potential to result in substantial effects on the Tavistock Canal section of the Cornwall and West Devon Mining Landscape WHS, on views from the Tavistock town part of the WHS and the two Grade II listed buildings at Fitzford Cottages and Crowndale Farm. More moderate effects would be likely with respect to buried archaeological remains, the Crowndale Mine, the former railway Conservation Area, and the Church of Our Lady and St Mary Magdelene (II*). Minor effects would be likely with respect to Westbridge Cottages, the statue of Sir Francis Drake and the Fitzford Gatehouse.

The heritage assessment submitted with the outline planning application identified specific measures that would reduce the nature and magnitude of impacts.
Step 4: What can be done in mitigation to maximise enhancements and avoid harm?
Strategic planting together with sensitive layout and design …

Sensitive layout and design together with strategic planting reflecting the historic forms of development on higher ground in Tavistock, such as Watts Road and Whitchurch.

Through these measures, assessment has identified that impacts would be reduced to moderate adverse with respect to archaeological remains, the Tavistock Canal part of the WHS; and to minor for other parts of the WHS, the Tavistock Conservation Area, the former railway Conservation Area, the Crowndale Mine, two Grade II listed buildings at Crowndale Farm and on the Church of Our Lady and St Mary Magdalene. The reinstatement of the railway line would result in a potential cumulative minor beneficial effect on the railway Conservation Area.

The potential moderate adverse effect on buried archaeological remains would require a programme of detailed investigation ahead of construction.

At the reserved matters stage the impact of all building in heritage sensitive parts of the allocation would need to be of a high quality to ensure that its presence would not harm the setting of heritage assets. Close attention would need to be paid to scale, form, density, positioning, design and the materials used, including the amount of public space set around the proposed new buildings. If these aspects are carefully considered, the resulting development should respect and complement the setting of the heritage assets.

Building in the heritage sensitive parts of the site may impact detrimentally on the setting of the heritage assets identified. The design process must ensure that open space, gardens and green infrastructure within the development would tie in effectively with this area. The aim of creating a continuity of design in terms of quality, materials and landscaping should be paramount, with the aim to ensure compatibility with the character of the town and its setting.

In terms of the archaeology, it would be vital to have a full archaeological analysis provided within any Environmental Impact Assessment report in order that a full understanding of what may still remain below ground to be gained. By providing this, it would then be possible to identify what could be done in mitigation to avoid harm to any remaining archaeology.

The disused railway line is a Conservation Area that has potential for use as recreational green infrastructure.

Step 5: Is the proposed site allocation appropriate in light of the NPPF’s tests of soundness?
When detailed planning applications within the allocated site are brought forward, this will provide adequate opportunity for the potential impact on those assets and their setting to be considered in more detail, to identify and implement specific opportunities to enhance those assets, and a strategy, where relevant, for conservation and enjoyment of such (NPPF 126, 129, 131-135, 137, 139, 141).
Site Selection Methodology:

Step 1: Are any heritage assets affected by the potential site allocation?
- Dartington Lodge, Grade II (List UID: 1291286)
- Bridge immediately north east of Dartington Lodge, Grade II (List UID: 1324960)

There are a number of identifiable heritage assets (see list above), both designated and non-designated. The potential impact of development on those buildings and their settings will need careful consideration in terms of the layout, design, materials, orientation, scale and massing.

Step 2: What contribution does the site make to the significance of the heritage asset?
The site forms part of the setting of a number of listed structures and contributes to the setting of them in terms of the views of and from those heritage assets, and in terms of the quality and openness of the surrounding rural area in which those buildings sit. The site is part of the naturally low-lying riverside land, which rises up towards the main Dartington estate.

Step 3: What impact will the site allocation have on that significance?
Development is likely to have an impact on the setting of the heritage assets listed above, as it could be seen in the foreground of those structures when viewed from the south. It is noted that the site is low-lying land and there is mature woodland, which separates the site from the assets in question. The effect on significance will be determined in the detail of the development, the scale and position of the buildings, their design and material choice. While visible in views of the heritage assets, the separation distance may, alongside the design aspects, have some limiting effect on the potential to impact significance.
Step 4: **What can be done in mitigation to maximise enhancements and avoid harm?**
In terms of the heritage assets and the impact of development, any building would need to be of a high quality to ensure that its presence would not impact detrimentally on the surrounding heritage assets including those buildings identified as being of the highest quality townscape merit. Close attention would need to be paid to height, positioning, design and the materials used, including the amount of public space set around the proposed new building. If these aspects are carefully considered, the resulting development should be achievable while avoiding harm to the special character.

In terms of the archaeology, it would be vital to have a full archaeological analysis provided within any Environmental Impact Assessment report in order that a full understanding of what may still remain below ground to be gained. By providing this, it would then be possible to identify scope for mitigation to avoid harm to any remaining archaeology.

Development in this location should follow existing field patterns and landform and the height of buildings will be key to ensuring key views into and from the heritage assets are maintained.

Step 5: **Is the proposed site allocation appropriate in light of the NPPF’s tests of soundness?**
When detailed planning applications are brought forward, this will provide adequate opportunity for the potential impact on those assets and their setting to be considered, to identify and implement opportunities to enhance those assets, and a strategy for conservation and enjoyment of such (NPPF 126, 129, 131-135, 137, 139, 141).
Site reference: TTV29 (4)

Site: Higher Barton, Dartington

Allocation: Mixed use

NGR: SX 7993 6292

Site Selection Methodology:
Step 1: Are any heritage assets affected by the potential site allocation?
The Dartington Estate is a special place indeed, embracing a plethora of heritage assets. Heritage Assets, which define two ages, firstly those from the medieval period and then those buildings, which reflect some of the first examples in the country of the International Modern style. There are a number of designated heritage assets surrounding the site allocation, specifically Dartington Hall (Grade I), Dartington Hall Registered Park & Garden (Grade II*), Deer Park Walls (SAM), Tower of Former Church of St. Mary (Grade I), Warren Lane Housing (all Grade II), a group of 3 Lescaze Boarding Houses (Blacklers, Chimmels & Orchards) (all Grade II), Aller Park School (Grade II). This list is not exhaustive and there are many other designated heritage assets within the core Estate, including various headstones, memorials, garden structures and Lodges. There are also a number of non-designated heritage assets within the vicinity.

There is high potential for archaeology within this area.
Step 2: **What contribution does the site make to the significance of the heritage asset?**

As the site allocation is in very close proximity to multiple heritage assets, some of which are of noted national importance, the setting of those constituent assets within this element of the core estate is both extensive and varied, with many of the assets’ settings overlapping with each other.

The site currently embraces an area of land which has been previously developed and still retains many structures within it. The current car parks for visitors to the site are within the allocation and are situated on the site of the former Barton farmyard. It can be argued that this area, which is dominated by vehicular movements, offers a negative contribution to the significance of multiple heritage assets as identified. However, the surrounding fields to the north and the west, which are in close proximity to the scheduled deer park boundary are important elements in long distance views in towards Dartington Hall. These immediately adjacent open fields (west of the allocation) link the Hall and its historical development to the surrounding landscape and the contemporaneous deer park. As such they offer an important and positive contribution to the Hall’s significance.

The ‘openness’ afforded by the current undeveloped fields/pasture land to the north east of Lescaze’s three boarding houses and the land to the west of the row of listed houses on Warren Lane also makes a positive contribution to both sets of these identified assets’ significance.

Step 3: **What impact will the site allocation have on that significance?**

If the boundaries to the site allocation follow the established boundaries of the previously developed land, then future ‘mixed use’ developments need not adversely impact on the significance of the identified heritage assets. There is an opportunity to enhance the setting of some of the key identified heritage assets by revisiting current vehicular movements through the estate and better integrating the existing car park area with the established heritage assets to the north and the west (Aller Park, Lescaze’s Boarding Houses & Warren Lane). Careful consideration will need to be given to both the boundary of the existing car park area to the north and the west to mitigate against potential impacts on both immediate and wider settings of the identified heritage assets.

Step 4: **What can be done in mitigation to maximise enhancements and avoid harm?**

To mitigate against potential harm it is essential to ensure that boundary edges to the site are well considered and are landscaped appropriately to render a soft edge thus maintaining the rural character of the wider Estate landscape. Encroachment into previously undeveloped areas of pasture land, given their relationship with the scheduled deer park, the historic park and garden and the settings of nationally significant heritage assets, could result in a harmful impact to the significance of the assets.

Quality, innovative and exceptional design is synonymous with the Estate and any future development proposals will need to embrace sound design principles to ensure that the special architectural and historic qualities of the estate are upheld and are not diluted to its detriment.

An assessment of the archaeological potential for the site should be undertaken to aid in informing further understanding and steering development proposals.

Step 5: **Is the proposed site allocation appropriate in light of the NPPF’s tests of soundness?**

When detailed planning applications are brought forward, this will provide adequate opportunity for the potential impact on those assets and their setting to be considered, to identify and implement opportunities to enhance those assets, and a strategy for conservation and enjoyment of such (NPPF 126, 129, 131-135, 137, 139, 141).
Site Selection Methodology:
Step 1: **Are any heritage assets affected by the potential site allocation?**

The Dartington Estate is a special place indeed, embracing a plethora of heritage assets. Heritage assets, which define two ages, firstly those from the medieval period and then those buildings, which reflect some of the first examples in the country of the International Modern style. There are a number of designated heritage assets surrounding the site allocation, specifically High Cross House (former Headmaster’s house) (Grade II*) located to the north east of the site, Foxhole (the former Dartington Hall School) (Grade II) immediately to the east of the site, Lescaze’s Gymnasium (Grade II) immediately to the south and adjoining Foxhole, Shinner’s Bridge House (Grade II) located within the allocation in the south west corner, Shinner’s Bridge Cottages and Spedding Cottages (both Grade II) to the south west of the site (outside of the core estate), St. Mary’s Church (Grade II*) and the Old Postern (Grade II*) and associated structures.

There is high potential for archaeology within this area.
Step 2: What contribution does the site make to the significance of the heritage asset?

The site currently embraces a relatively dense wooded area to the south and west of Foxhole school with a large more open ‘car park’ area immediately to the west of Foxhole but at a considerably lower level than the former school, which sits proud on a knoll above. These two immediate areas adjacent to Foxhole contribute to how this asset is experienced and as such influences the listed building’s setting. This same sentiment relating to Foxhole’s setting can also be expressed for the playing fields area (across the small dividing lane leading from the shops up to the Symon’s Tree Barn access) located to the west. The planned inter-visibility between High Cross House and Foxhole (although eroded to a degree through more recent vegetative growth) is a key factor in both buildings’ setting afforded to this day by a lack of development between the two assets.

The remaining areas of the site allocation are largely the existing car park areas, including overflow car parking and the existing established retail area towards the south west corner. The ‘openness’ afforded by both the playing fields area to the immediate north west of the site and the undeveloped fields/pasture area immediately south of the Church of St. Mary and the Old Postern deliver the essential rural character, which is synonymous with the Estate. This relationship between the highly graded heritage assets and their surrounding landscape offers a positive contribution to their setting and their overall significance.

Step 3: What impact will the site allocation have on that significance?

If the boundaries to the site allocation, in the main, follow the established boundaries of the previously developed land, then future ‘mixed use’ developments need not adversely impact on the significance of the identified heritage assets. Careful consideration will need to be given to both the northern boundary of the existing car park area and the north east boundary of the overflow car parking area (adjoining the playing fields) so as any potential impact on the setting of High Cross House, Foxhole, The Old Postern and St. Mary’s Church in particular can be avoided or mitigated.

Heritage assets in the shops and Foxhole area have been identified and assessed in the estate’s Heritage Management Overview, which shows that there are five designated heritage assets (all Grade II listed buildings) in the area. These assets are all reasonably dispersed, apart from Foxhole (the former Dartington Hall School) and the Gymnasium immediately to its south, which form part of a coherent ensemble.

The topography and vegetation provide some screening within the setting of the estate’s heritage assets. A detailed assessment of heritage impacts will be possible when the scope of development has been defined and the nature and layout planned.
Step 4: **What can be done in mitigation to maximise enhancements and avoid harm?**
To mitigate against potential harm it is essential to ensure that boundary edges to the site are well considered and are landscaped appropriately to render a soft edge thus maintaining the rural character of the wider Estate landscape. Encroachment into previously undeveloped areas of pasture land and playing fields, given their relationship with both one of the principal access routes though the estate and the identified heritage assets, could result in a harmful impact to those assets and their settings.

Quality, innovative design is synonymous with the Estate and any future development proposals will need to embrace sound design principles to ensure that the special architectural and historic qualities of the estate are upheld and not diluted to its detriment.

An assessment of the archaeological potential for the site should be undertaken to aid in informing further understanding and steering development proposals.

Any development should be informed by a historic character assessment and form part of the Estate’s Historic Management Overview to ensure a holistic and co-ordinated approach across the estate.

Step 5: **Is the proposed site allocation appropriate in light of the NPPF’s tests of soundness?**
When detailed planning applications are brought forward, this will provide adequate opportunity for the potential impact on those assets and their setting to be considered, to identify and implement opportunities to enhance those assets, and a strategy for conservation and enjoyment of such (NPPF 126, 129, 131-135, 137, 139, 141).
Site Selection Methodology:
Step 1: Are any heritage assets affected by the potential site allocation?
- Church of St Mary, Grade II* (List UID: 1219488)
- Church Cottage, Grade II (List UID: 1324957)
- The Old Church House, Grade II (List UID: 1210539)
- New Church House Cottage, Grade II (List UID: 1108335)
- Cob Cottage, Grade I (List UID: 1210521)
- Croft Dene, Grade II (List UID: 1108336)
- Week Cottages, Grade II (List UID: 1290409)
- Woodcott Woddicott, grade II (List UID: 1108337)
- Pigsty and privy immediately south east of Woodcott, Grade II (List UID: 1210616)
- Knoddy, Grade II (List UID: 1108339)
- Bridge approximately 25 metres south of Woodcott, Grade II, (List UID: 1210636)
- Wellhouse or pigsty approximately 13 metres south of Woodcott, Grade II (List UID: 1108338)
- Granarey immediately south of Woodcott, Grade II (List UID: 1324987)
- Dartington Church of England Primary School Grade II (List UID: 1108325)
- Pair of gate piers immediately south of Dartington Church of England Primary School Grade II (List UID: 1108326)
There are a number of identified designated heritage assets surrounding the proposed area, specifically the 19th century Church of St. Mary (Grade II*) and associated Church Cottage (Grade II) to the north east and the Old Postern (Grade II *) also to the north east. To the south of the site (inter-visible with it) on the other side of the A385 lies Lescaze’s 1935 Central Office (Grade II), the former offices of the Dartington Hall Estate. To the south west of the site lies the small enclosure of Yarner with late medieval origins (Grade II) and associated buildings. To the immediate west and south west of the site lies the late medieval hamlet of Week with a number of designated heritage assets within it, comprising mainly 16th century (in origin) properties remodelled largely in the 17th century, all embracing a Grade II status including an early 19th century bridge 25m south of Woodcott. To the immediate north of the site lies Broom Park, a group of 1932 (L.de Soissons) estate workers’ houses (non-designated).

There is high potential for archaeology within this area.

Step 2: What contribution does the site make to the significance of the heritage asset?

The site, which is currently open agricultural land, relates positively in context to the established late medieval settlement of Week, offering a buffer at its western edge between the individual heritage assets including the hamlet in its own right and development to the east and the south. This ‘openness’ afforded by the current lack of development on the site undoubtedly contributes positively to the rural setting of the hamlet of Week and those identified heritage assets within it. Broom Park was undoubtedly originally designed to take advantage of views across to the south, although this original design concept has been somewhat compromised by the inclusion of a single-storey block of properties on the southern edge of the estate built in the 1970s.

Step 3: What impact will the site allocation have on that significance?

Of the identified heritage assets, those located within the hamlet of Week have the potential to be most affected by the site allocation and future development proposals. Development pushed up close against both the northern edge and the western edge has the potential to impact on the setting of both historic assets at Week and Broom Park. Distant views of St. Mary’s Church particularly its Tower will need careful consideration especially in the context of a south-western direction to avoid potential adverse impacts on its setting.

Step 4: What can be done in mitigation to maximise enhancements and avoid harm?

To mitigate against potential harm, both the northern and western boundaries should be curtailed to ensure an appropriate buffer between Week to the west and Broom Park to the north or alternatively a buffer afforded through a lack of built development (houses) via appropriate landscaping at these identified edges to the allocation. Any future development on this site should embrace a sound design approach, one that is appropriate for its immediate and wider context, paying particular attention to both built form and palette of materials.

Site layouts will need careful consideration to ensure distant views of the St. Mary’s Church Tower are not unduly compromised thus potentially affecting its setting.

An assessment of the archaeological potential for the site should be undertaken to aid in informing further understanding and steering development proposals.
Step 5: **Is the proposed site allocation appropriate in light of the NPPF’s tests of soundness?**
When detailed planning applications are brought forward, this will provide adequate opportunity for the potential impact on those assets and their setting to be considered, to identify and implement opportunities to enhance those assets, and a strategy for conservation and enjoyment of such (NPPF 126, 129, 131-135, 137, 139, 141).
Site Selection Methodology:

Step 1: **Are any heritage assets affected by the potential site allocation?**
- Deer park north and north west of Dartington Hall, Scheduled (List UID: 1020870)
- Church of St. Mary, Grade II* (List UID: 1219488)
- Church Cottage, Grade II (List UID: 1324957)
- Old Postern, Grade II* (List UID: 1219732)
- Wall and pair of gate piers adjoining south east of old postern, Grade II (List UID: 1108356)
- Former coach house, stables and barn immediately south east of old postern, Grade II (List UID: 1108357)

There are a number of identifiable heritage assets, both designated and non-designated. Some of these assets located to the south of the site are unlikely to be affected due to intervening vegetation and existing intervening buildings. However, the potential impact of development on the deerpark pale, St Mary’s Church in particular, and the settings of each, will need careful consideration in terms of layout, design, materials, scale, massing and orientation.

Step 2: **What contribution does the site make to the significance of the heritage asset?**
Any development within this site needs to maintain a buffer between it, and the identified heritage asset. In particular, along the north-east boundary of the site where the deerpark pale is located. The heritage asset should be outside of the allocation.

Step 3: **What impact will the site allocation have on that significance?**
The depot pale is currently surrounded by mature vegetation and was originally a rural landscape feature, which now denotes this historic use. If development on this site is of a low-key nature, maintains a buffer between it and the heritage assets, and building height is suitably low level, then it is possible the outcome could have a neutral impact.
Step 4: What can be done in mitigation to maximise enhancements and avoid harm?
Any new development should be designed and located so as to maintain a suitable level of vegetative cover, and should be low density with careful attention to scale, massing and building height.

In terms of the archaeology, it would be vital to have a full archaeological analysis provided within any Environmental Impact Assessment report in order that a full understanding of what may still remain below ground to be gained. By providing this, it would then be possible to identify what could be done in mitigation to avoid harm to any remaining archaeology.

Step 5: Is the proposed site allocation appropriate in light of the NPPF’s tests of soundness?
When detailed planning applications are brought forward, this will provide adequate opportunity for the potential impact on those assets and their setting to be considered, to identify and implement opportunities to enhance those assets, and a strategy for conservation and enjoyment of such (NPPF 126, 129, 131-135, 137, 139, 141).
Site Selection Methodology:
Step 1: *Are any heritage assets affected by the potential site allocation?*

The bulk of the site lies outside the Hatherleigh Conservation Area, although the access from Bridge Street, including the area of the car park, lies within it.

The site is in close proximity to several listed buildings including the Grade I St John the Baptist's Church, the Grade II thatched property associated with Cornwall Farmers and the Old Schools, and several other Grade II residential properties around the old Market Square.
Step 2: What contribution does the site make to the significance of the heritage asset?
The principal issues are the impact on the setting of the Conservation Area and the setting of various listed buildings, especially the Grade I Listed Church. The townscape of Hatherleigh has many locally distinctive features based on the nature and form of enclosure by buildings, walls, the scale, form and materials of the buildings and the sinuous character of the street layout. It is important that these features and others identified through detailed assessment are incorporated into the urban design and architectural parameters at the detailed application stage.

Vistas are available from and to the church and the site lies within the setting of some of the surrounding listed properties.

The Hatherleigh Conservation Area Character Appraisal emphasises the distinctive street layout and pattern of built form as important to the character and appearance of the area.

The present town plan is largely medieval in origin and this is evident in the informal street pattern and grouping of buildings, which should be reflected in the design at detailed application stage.

The Conservation Area Character Appraisal published by WDBC in 1998 provides a concise identification of some of the important components that form the unique character and appearance of Hatherleigh, these include; the medieval street plan; the burgage plots; the Tuesday market; the larger public buildings such as the Town Hall and the Baptist Church; the larger domestic buildings mainly rendered, detached and from the Nineteenth Century including Edyes Villa, Reed House and the Rectory; historically important buildings including the Parish Church; and the plainer domestic buildings, some of which are listed – these form the principal building type in the town and are mainly arranged in terraced rows that step up and down the streets.

With regards to below ground heritage, Devon County Council Historic Environment Team made no objection subject to the condition, which has been applied.

Step 3: What impact will the site allocation have on that significance?
There are a number of identifiable heritage assets, both designated and non-designated and the potential impact of development on those buildings and their settings will need careful consideration including matters such as layout, design, materials, scale and massing.

The development is likely to have some impact on the setting of the nearby listed buildings, though the extent and nature of that impact will be largely determined by a detailed application, taking into account the matters set out above.

While many details have yet to be defined at reserved matters stage, the current proposal is capable of avoiding harm and adequately protecting the setting of the Conservation Area and nearby listed buildings, and the proposal presents an opportunity to reflect Hatherleigh’s street patterns and built character within its later detailed stages.
Step 4: **What can be done in mitigation to maximise enhancements and avoid harm?**

The removal of buildings on site would open up views of and from the church and surrounding listed buildings.

There is limited detail to consider at this stage in relation to the setting of these heritage assets as the proposal is in outline only.

New dwelling design and the design in general of new employment and retail buildings and the market pavilion will be crucial in securing a quality design for the site, and to protecting the setting of these listed buildings. Some preparatory work has already been done in relation to these elements as evidenced in the Design and Access Statement, which clearly identifies existing settlement patterns in Hatherleigh, and how they might be interpreted and reflected within a street layout on the new site. Details, including vistas of the church, the setting of the surrounding listed properties. Similarly, design and layout can draw on the existing character of the town such as frontage terraces, mixed use properties and carriageway arches.

In terms of mitigation and enhancements to avoid harm, particularly on those buildings identified as being of the highest quality townscape merit, any development would need to be of a high quality and close attention would need to be paid to height, positioning, design and the materials used. In particular, the use of quality public space around new buildings will be key to effectively tie the new to the old, to create continuity of design and ensure flow through the site.

If these aspects are carefully considered, development on this site has potential to make a positive contribution to the character of the town and to the setting of existing heritage assets, not least when compared to the current state of the site.

In terms of the archaeology, it would be vital to have a full archaeological analysis provided within any Environmental Impact Assessment report in order to establish a full understanding of what may still remain below ground. It would then be possible to identify what mitigation options are available to avoid harm to any remaining archaeology.

While many details have yet to be defined at reserved matters stage, the current proposal is capable of avoiding harm and adequately protecting the setting of the Conservation Area and nearby listed buildings, and the proposal presents an opportunity to reflect Hatherleigh’s street patterns and built character within its later detailed stages.

Step 5: **Is the proposed site allocation appropriate in light of the NPPF’s tests of soundness?**

The proposed mixed use scheme incorporating the removal of existing unsightly and dilapidated buildings and development of new residential, business and public open space presents an important opportunity to deliver a positive strategy for conservation and enjoyment of the historic environment (NPPF 126, 137 & 141). Potential to improve views from and to historic assets in the immediate vicinity, and to enhance the site itself, which forms part of the setting of such buildings, creates opportunities to enhance those assets. Later detailed planning applications will define the detail and include proper assessment and response to the significance of heritage assets (NPPF 129, 131-135, 139).
Site Selection Methodology:
Step 1: **Are any heritage assets affected by the potential site allocation?**
Non-designated Historic Park and Garden on the Garden Society List and the West End Cottages are a non-designated heritage asset.

This site is positioned between the Saxon / medieval settlement core and the newly discovered hillfort on the ridge crest of Lifton Wood. The village has been an important Saxon Royal settlement.

Step 2: **What contribution does the site make to the significance of the heritage asset?**
There are two identifiable, but non-designated, heritage assets (see Step 1) on which development has the potential to impact.

The setting of North Lodge, which is already compromised by late 20th Century commercial development in close proximity, would be preserved since the allocation area is now some 150m to the east. When travelling along the access road to Lifton Wood (non-designated Historic Park and Garden), the visitor would experience glimpsed views of the site to the east. Whilst this is likely to be a limited impact, consideration is necessary to the relationship between the layout, form and development and the setting.

West End cottages, also a non-designated asset, lie on the north side of the road that passes the allocation. The boundary to the allocation is sufficiently distant to lie outside the setting, but when travelling along the road (foot, cycle or vehicle) the two would be seen in sequence.
Step 3: **What impact will the site allocation have on that significance?**
The potential for adverse impact on the significance of the assets identified is limited.

A wide area of undeveloped land would be maintained between the allocation and North Lodge and the allocation and the access road to Lifton Wood, such that the experience of the visitor to that asset would not be harmed by distant development, which would be out of the immediate line of sight. The allocation abuts the woodland, having the potential to affect the relationship between the two areas of land.

When travelling along the road (foot, cycle or vehicle) the allocation site and West End Cottages would be seen in sequence.

Development has the potential to destroy unknown archaeological remains.

Step 4: **What can be done in mitigation to maximise enhancements and avoid harm?**
In addition to the separation between North Lodge, the access road and the allocation, policy requirement should include the need for a landscaping strategy that includes an appropriate orientation of open space and new planting that complements the enjoyment, by visitors, of the woodland to the south.

The footprint of development, its layout, scale, massing, design and materials will need careful consideration such that the sequential experience of entering or leaving the village can be enhanced in the context of the heritage assets identified.

In terms of the archaeology, full archaeological analysis would be necessary in order that a full understanding of what may still remain below ground can be gained. By providing this, it would be possible to identify what measures are appropriate in mitigation to avoid harm to any remaining archaeology.

Step 5: **Is the proposed site allocation appropriate in light of the NPPF’s tests of soundness?**
When detailed planning applications within the allocated site are brought forward, this will provide adequate opportunity for the potential impact on those assets and their setting to be considered in more detail, to identify and implement specific opportunities to enhance those assets, and a strategy, where relevant, for conservation and enjoyment of such (NPPF 126, 129, 131-135, 137, 139, 141).
Site reference: TTV29 (16)
Site: Pennpark, Modbury
Allocation: Housing – 40 dwellings
NGR: SX 652518

Site Selection Methodology:
Step 1: Are any heritage assets affected by the potential site allocation?
Edmeston, which lies approximately 1km to the west where both the farmhouse and farm buildings are listed Grade II.

Flete House, which lies approximately 2.5km south west, where the listing includes various buildings. Notably the exceptional Grade I House and the Grade II Registered Park.

Step 2: What contribution does the site make to the significance of the heritage asset?
The allocated site currently makes no contribution to the setting of Flete House, due to intervening landform and no inter-visibility. However, development proposals should be required to ensure building heights do not break the natural ridgeline and maintain the natural screening the landforms provide.

Edmeston is a farmstead set in rolling countryside. The house is oriented with principal rooms facing south west along the entrance drive so there is not a planned orientation or garden / landscape layout in the direction of the allocation. Most of the barns have been granted permission for conversion to 7 dwellings (2000) and that appears to have been commenced, but not completed. Some units would have openings in the direction of the allocation, but this is not a designed orientation, which contributes to significance. The allocation site is linked to a part of the rural backdrop and hence development in the wider area would have potential to affect the setting of the group, although making only a minor contribution to significance. The extent of the allocation has been reduced through removal of the northern fields and the setting is not likely to be affected.

The allocation site makes no contribution to the significance of Flete.
Step 3: **What impact will the site allocation have on that significance?**
The allocation sits to the south east of Edmeston and would, from that asset, be viewed against a backdrop of existing development. As these include farm buildings, there is a degree of influence on the setting at the western edge of the allocation, albeit a small impact as experienced from some parts of the farmstead group.

Due to intervening topography, buildings and trees it is not likely to be any inter-visibility, but this would need to be tested in detail should an application come forward.

Step 4: **What can be done in mitigation to maximise enhancements and avoid harm?**
The allocation lies at the edge of rolling countryside and it is desirable to retain green infrastructure and ensure the density and housing mix allows for significant planting in the layout plan, particularly at the western edge.

Step 5: **Is the proposed site allocation appropriate in light of the NPPF’s tests of soundness?**
When detailed planning applications within the allocated site are brought forward, this will provide adequate opportunity for the potential impact on those assets and their setting to be considered in more detail, to identify and implement specific opportunities to enhance those assets, and a strategy, where relevant, for conservation and enjoyment of such (NPPF 126, 129, 131-135, 137, 139, 141).
Site Selection Methodology:

Step 1: **Are any heritage assets affected by the potential site allocation?**

- The Barracks, which lies to the north east is Grade II listed ‘*Former infantry barracks, with gatehouses*’
- Edmeston, which lies approximately 1km to the west where both the farmhouse and farm buildings are listed Grade II.
- Flete House, which lies approximately 2.5km south west, where the listing includes various buildings. Notably the exceptional Grade I House and the Grade II Registered Park.
Step 2: What contribution does the site make to the significance of the heritage asset?

‘The Barracks’ walls are remnants dating from the Napoleonic wars. The listing is described as rubble stone walls varying from 2m to 3m in height and enclosing a long rectangular opening, narrowing to a rounded point at the north end.

Late 20th Century development immediately adjacent to the walls means the setting has already been compromised and harmed. The boundary of the allocation would be some 100m away from the walls with the intervening land remaining open fields, such that it is considered to lie beyond the setting of the heritage asset.

Edmeston is a farmstead set in rolling countryside. The house is oriented with principal rooms facing south west along the entrance drive so there is not a planned orientation or garden / landscape layout in the direction of the allocation. Most of the barns have been granted permission for conversion to 7 dwellings (2000) and that appears to have been commenced, but not completed. Some units would have openings in the direction of the allocation, but this is not a designed orientation, which contributes to significance. The allocation site is linked to a part of the rural backdrop and hence development in the wider area would have potential to affect the setting of the group, although making only a minor contribution to significance. The extent of the allocation has been reduced through removal of the northern fields and the setting is not likely to be affected.

The allocation site makes no contribution to the significance of Flete beyond being partly visible distant fields.

Step 3: What impact will the site allocation have on that significance?

Development of the reduced allocation area has potential to result in a change to the setting, but any harm would be less than substantial. The setting of the Barracks has been harmed already by the Long Park development so the proposed allocation will have a minimal further impact and is likely to be outweighed by the public benefit of providing for housing need close to an established settlement with full facilities.

The allocation will have little or no effect on significance with respect to Edmeston, but will have a small impact on setting as experienced from some parts of the farmstead group.

Development of the original site area, which was proposed at Regulation 18 consultation, would be likely to be visible from some rooms in the main house (Flete House) and from elevated locations within the registered parkland. The lodges and lower lying land would have no inter-visibility. The reduced extent of the proposed allocation means that there is not likely to be any inter-visibility, but this would need to be tested in detail should an application come forward.
Step 4: **What can be done in mitigation to maximise enhancements and avoid harm?**
The reduction of the extent of the allocation has significantly reduced the likelihood that impact on any heritage asset would be anything more than 'less than substantial'.

With respect to the Barrack’s wall, the removal of the nearest field moves the development away from the setting. Design and layout requirements will leave some element of buffer in the form of landscaping, public space or plots with good-sized gardens and scope for tree planting. Some interpretation of the heritage asset is very desirable and a possible contribution towards a Management Plan could present a real benefit as the Barracks wall is suffering neglect and there has been a partial collapse already.

As the allocation site lies in rolling countryside it is desirable to retain green infrastructure and ensure the density and housing mix allows for significant planting in the layout plan. Even though the reduced extent of the allocation takes development out of the immediate setting of Edmeston and Flete House, this approach will be required in the policy text to ensure an appropriate form of development when seen in long distance views that include the allocation and the heritage assets.

Step 5: **Is the proposed site allocation appropriate in light of the NPPF’s tests of soundness?**
When detailed planning applications within the allocated site are brought forward, this will provide adequate opportunity for the potential impact on those assets and their setting to be considered in more detail, to identify and implement specific opportunities to enhance those assets, and a strategy, where relevant, for conservation and enjoyment of such (NPPF 126, 129, 131-135, 137, 139, 141).
Site reference: TTV29 (18)

Site: Batheway Fields, North Tawton

Allocation: 61 dwellings and employment

NGR: SX 663 012

**Site Selection Methodology:**

**Step 1:** Are any heritage assets affected by the potential site allocation?
A late prehistoric or Romano-British enclosed farmstead settlement has been identified on land near the allocation. Roman forts, marching camps and associated monuments (UID: 10384).

**Step 2:** What contribution does the site make to the significance of the heritage asset?
The allocation site lies on green fields to the south / south west edge of North Tawton. A rectilinear enclosure was identified through geophysical survey. This area has, however, already been developed. An archaeological watching brief was followed.

**Step 3:** What impact will the site allocation have on that significance?
Planning permission was granted, reference 01037/2013, in 2014. The Decision Notice required, as a condition (Condition 14), the implementation of an archaeological written scheme of investigation.

The site has subsequently been partly developed with the area including the rectilinear enclosure built on. The condition has been complied with through an appropriate record being made of archaeological evidence / interest.

The site remains as an allocation since the development has yet to be completed.
Step 4: **What can be done in mitigation to maximise enhancements and avoid harm?**
The area where the rectilinear enclosure was identified has been developed. An archaeological watching brief continues to be observed.

To avoid harm to the identified asset, the Council has limited the extent of the allocation to that which already benefits from planning permission.

Step 5: **Is the proposed site allocation appropriate in light of the NPPF’s tests of soundness?**
Consideration was given to archaeological interest when making a decision on the planning application and, subsequently, issuing the planning permission. This included following the advice of the Devon County Council Historic Environment Team. This resulted in the inclusion, in the Decision Notice, of an archaeological condition that reflects NPPF (paragraphs 126, 129, 131-135 &139) by providing a positive strategy for the conservation of historic environment, and assessment of its significance.
Site Selection Methodology:

Step 1: Are any heritage assets affected by the potential site allocation?

There are a number of heritage assets that could be affected:

- Snapes Manor, Grade II* (UID: 397214)
- Boatyard building, Grade II (UID: 1213260)
- 1 and 2 Island Terrace, Grade II (UID: 1289253)
- Wall on west of front garden of Snapes Manor, Grade II (UID: 1289380)
- Outbuildings on north and east side of Snapes Manor, Grade II (UID: 1289380)
- Remains of Lime Kiln on the north shore of creek, 25 yards west of Snapes Manor, Grade II (UID: 1212727)
Step 2: **What contribution does the site make to the significance of the heritage asset?**

Approximately 200m north of the site, across the creek, in an isolated location stands Snapes Manor. This is a small country house, which is Grade II* listed. The orientation of its principal range suggests it was designed to take advantage of its riverside location and provide extensive views, including those across the creek, which incorporate the application site.

The Boatyard building and properties on Island Terrace are set adjacent to the creek and have a relationship with the water and surrounding banks. The creek provides the context for the setting of the Lime Kilns since they were located and designed to have a definite relationship when they provide lighting for fishermen. Today a sequential experience of the assets is enjoyed at the location for anyone travelling through on the water.

This wider setting reflects a long history of mixed development, including commercial and residential, but, not surprisingly, development has a strong maritime tie. The site itself is a mixture of existing buildings, boat park / general storage and green fields. This is set firmly within the visual envelope of this part of Salcombe, which was, historically, a more separate community.

The car park area in the southern part of the site is more distant from the heritage assets described. It is surrounded by housing and commercial uses and, viewed from them, therefore, in the context of the town setting.

Step 3: **What impact will the site allocation have on that significance?**

Given the existence and historic nature of development, which is of mixed uses, the potential for significant impact is limited.

Snapes Manor is the most affected heritage asset and at Grade II* is a most significant designation. It has an intended and designed outlook onto Batson Creek and directly towards the application site. There is some informal screening on the edge of the garden area, which partly screens views of the car park/boat store and the pontoons. Whilst this reduces visibility, it is not a permanent landscape feature and, therefore the assessment of effect on setting has to place limited weight on that screening. The car park/boat store is not attractive and has already harmed the setting, but these are relatively ephemeral features, not permanent physical structures.

With respect to users of the water and views from Snapes Manor and Island Street, the site is also substantially screened by boat moorings and the use of the foreshore for boat storage (in the winter) and car parking (in the summer). The activities in winter and summer provide a busy foreground behind which the impact of modest development (if sensitively designed) may be limited.
Step 4: **What can be done in mitigation to maximise enhancements and avoid harm?**

The layout, extent, massing, design and landscaping, and the materials to be used would need to be informed by a thorough analysis of the identified heritage assets and their settings – ideally through a development brief. Control of detailing as well as materials is important as simple buildings can be elevated by good details and this will be seen close up by many thousands of people. For example, a low-pitched roof to any building in this location would allow best visibility of the attractive undeveloped hillside.

Opportunities for enhancement of the whole area (within the ownership boundary) through landscaping should be explored. In particular, the quality of enclosure, surfacing and the absence of any planning in the car park/boat store could usefully be addressed. Scope also exists for better enclosure between the road and the car park/boat store and this could perhaps be punctuated with suitable tree planting.

The northernmost part of the site is cut into the natural topography, which offers the opportunity to have a built form that nestles into the landscape. The scrubby hedgerow growth to the west could help to punctuate the open hillside and reinforce the development as relating to marine activities.

Step 5: **Is the proposed site allocation appropriate in light of the NPPF’s tests of soundness?**

Detailed planning applications will provide an opportunity to assess significance, make an appropriate decision and implement a positive strategy where relevant, for the conservation and enjoyment of the historic environment (NPPF paragraphs 126, 129, 131-135, 137, 139, 141).
Site reference: TTV29 (23)

Site: South-east of Carehouse Cross, Stokenham

Allocation: Housing

NGR: SX 805 427

Site Selection Methodology:
Step 1: **Are any heritage assets affected by the potential site allocation?**

There are a number of identifiable heritage assets, both designated and non-designated in the location:

- The Little House, Grade II (List UID: 1107946)
- Corner Cottage and Southern Cross, Grade II (List UID: 1325176)
- The Old Post Office, Grade II (List UID: 1107945)
- Rose Cottage, Grade II (List UID: 1325175)
- The Old Library and Whitmore Cottage, Grade II (List UID: 1107944)
- Well Cottage, Grade II (List UID: 1107943)
- Tradesmans Arms Inn, Grade II (List UID: 1325174)
- Sunnyside, Grade II (List UID: 1107974)
- Peartree Cottage, Grade II (List UID: 1270307)
- Mary Ann Cottage, Grade II (List UID: 1317526)
- Walls, railings, gate-piers, gates and overthrow on south-south west and west and of church of St Michael, Grade II (List UID: 1165154)
- Church of St Michael, Grade I (List UID: 1107972)
- Forge Cottage and Rest Cottage (Grade II) (List UID: 1317526)

Other than the Forge Cottage and Rest Cottage, the site is screened and separated by existing buildings, trees and topography. These two properties lie outside the allocation area to the north-west and have the potential for views onto development.
Step 2: **What contribution does the site make to the significance of the heritage asset?**
The listing for the Forge Cottage and Rest Cottage describes mediaeval origins and architectural merits. Site inspection reveals that the Cottages sit on the road and, predominantly face to it, with the setting being reasonably tight as would fit an, historically, small working property within the confines of a rural village. More recent development, a telephone exchange buildings, to the south east of the property re-enforces the closeness of the setting such that it relationship to the open fields that are the subject of the allocation is limited.

In the wider context and sequential experience of being in Stokenham, the layout, scale, massing, design and materials will influence the nature of the impact on designated and non-designated heritage assets.

Step 3: **What impact will the site allocation have on that significance?**
The boundary of the allocation is separated from the heritage assets identified by distance and a more recently built property. The scope for an impact is limited, although the nature of the development will dictate whether views onto housing would or would not be available.

Step 4: **What can be done in mitigation to maximise enhancements and avoid harm?**
Strategic landscaping and open space in the north-west corner would provide further separation between the heritage assets and the site.

Heritage Assessment at the application stage would be necessary to inform the layout, scale, massing, design and materials to ensure an appropriate form of development in this historic village.

Detailed archaeological assessment would also be a requirement in order that a full understanding of what may still remain below ground is to be gained. By providing this, it would then be possible to identify what could be done in mitigation to avoid harm to any remaining archaeology.

Step 5: **Is the proposed site allocation appropriate in light of the NPPF’s tests of soundness?**
Taking into account the number and location of heritage assets, along with separation distances and intervening landscape features, the allocation of this site is unlikely to have a detrimental impact on significance of heritage assets. When detailed planning applications are brought forward, this will provide adequate opportunity for the potential impact on those assets and their setting to be considered, to identify and implement opportunities to enhance those assets, and a strategy for conservation and enjoyment of such (NPPF 126, 129, 131-135, 137, 139, 141).
Site: Woolwell, Plymouth
Allocation: Housing
NGR: SX510621

Constraints / things the development should provide for:

Additional investigation as part of detailed master-planning will be needed to establish the impact of future development on the setting and significance of the Grade I listed Church of St Mary in the hamlet of Bickleigh.
Further assessment of the Grade II structures within the ZTV will be required in respect of these designated heritage assets to ensure that any potential effects on their setting are avoided or mitigated as part of the master-planning process.

Further work will also be required, in the form of a desk-based archaeological assessment, to determine the archaeological potential of the site with particular reference to HER records indicating historical mine working and the former tramway.

Step 1: **Are any heritage assets affected by the potential site allocation?**

**Within the Site**

There are no designated heritage assets within the site.

There are no conservation areas, or parts thereof, that extend into the site.

**The Surrounding Area**

Within approximately 1km of the site boundary, there is one scheduled monument, one Grade I listed building and eight Grade II listed buildings.

There are no records relating to historic battlefields, registered parks and gardens or conservation areas within 1km of the site boundary.

The scheduled monument comprises an animal pound (SM1019786) within the village of Roborough, c.250m to the west of the site boundary.

The Grade I listed Church of St Mary is located in the hamlet of Bickleigh, c.400m to the north east of the site boundary.

In terms of the Grade II listed buildings, the National Heritage List for England identifies within c.1km of the site boundary. An initial assessment (carried out by EDP for the landowner / developer) has identified that the significance of five of these could potentially be effected by changes within their setting. Those five Grade II listed buildings are:

- Bickleigh House (LB1309743) and its associated gate piers (LB1162247 and LB1107479);
- Hatshill House (LB1107475) and the village cross (LB1107474) both in Bickleigh.

The HER indicates that there may be evidence for mine working within the site in addition to the former tramway.
Step 2: What contribution does the site make to the significance of the heritage asset?

Views of the south eastern part of the allocated site will be screened from St Mary’s Church by the rising landform and existing woodland (Coombe Wood and Rock Wood). The site currently forms part of the rural setting of the church in distant views.

The separation distance between the housing and the village also maintains an effective buffer of green space which will keep the newly developed area distinct and separate from the village where the Grade I listed church and two Grade II assets are located.

The listed gate piers at the end of the drive serving Hatshill House are located on New Road and are screened from the site immediately to the south by a mature hedge. However, the landform in this northernmost part of the site rises up from the road and as such there will be inter-visibility between Hatshill House and the site.

Step 3: What impact will the site allocation have on that significance?

The Grade I listed Church of St Mary is located in the hamlet of Bickleigh c.400m to the north east of the site boundary. However, given that its current setting is dominated by the adjacent military barracks (particularly in views from the north and west within the National Park), should any changes within its setting be identified, further assessment would be required to determine the effect on its significance. Indeed, the opportunity to create new vantage points within the site for the public to enjoy views of the church (largely unfettered by the barracks) has the potential to enhance the appreciation of this asset.

The scheduled monument comprises an animal pound (SM1019786) within the village of Roborough, c.250m to the west of the site boundary. The monument will be physically unaffected and, due to its position within the built form of the village, which forms its setting, consideration of effects on its significance through changes within its setting will need to be the subject of further consideration when more detail is available with respect to the quantum, layout and form of development.

The HER indicates that there may be evidence of mine working within the site in addition to the former tramway. These are of low archaeological value, but it is understood that the line of the tramway will be preserved within the master-planning of the site. Further work in the form of a desk-based archaeological assessment may be required to determine the archaeological potential of the site to inform a future planning application.

With respect to non-designated heritage assets, there is currently no evidence to suggest that the site will contain any archaeological deposits that will constrain the development of the site. The potential to encounter finds or features of prehistoric or Roman date is low, based on the current record, and ploughing will have further reduced this potential.
Step 4: **What can be done in mitigation to maximise enhancements and avoid harm?**

Sensitive masterplanning is essential in order to ensure that any impacts identified can be mitigated.

Step 5: **Is the proposed site allocation appropriate in light of the NPPF’s tests of soundness?**

Consideration will be given to historic landscape character, heritage assets and archaeological interest when making a decision on the planning application and, subsequently, issuing the planning permission.
Site Reference: PLY48

Map showing site allocation in context

Site: Sherford
Allocation: Housing and mixed use
NGR: SX547533

Constraints / things the development should provide for:
The site has planning permission for development and conditions identify how heritage impacts will be addressed. This is covered in detail in the sections below.

Step 1: Are any heritage assets affected by the potential site allocation?
There are eleven built heritage receptors in and around the development site. Of these, 4 are listed buildings and 2 area registered parks. No conservation areas are affected by the development.

- West Sherford Farm, Grade II
- East Sherford Farm, undesignated
- Butlas Farm, undesignated
- Sherford Kilns, undesignated
- Higher Hareston manor house, Grade II
- Wollaton Farmhouse, shippen and barn range, Grade II
- Wiverton House, Grade II
- Wiverton outbuildings, undesignated
- Hareston complex, undesignated
- Saltram Park, Grade II*
- Plympton House, Grade II registered park

There are no Scheduled Ancient Monuments, registered historic battlefields of other statutory designated archaeological sites within the boundary of the development. However Plymouth SMR and the Devon HER records 94 sites within the surrounding area.

NB – maps of the recorded heritage assets can be seen at Appendix 1 to this report.

Step 2: **What contribution does the site make to the significance of the heritage asset?**

The development would have a significant adverse effect on the setting of the Grade II listed farmhouse at West Sherford. The development would also have a significant effect on the setting of the Scheduled Ancient Monument, the Wasteberry Camp Iron Age Hillfort to the east of the development.

Step 3: **What impact will the site allocation have on that significance?**

Tables 9.8 and 9.9 of the Sherford EIA (Scott Wilson, November 2006) provide summary of the impacts and effects of the development on built heritage and archaeology – see Appendix 2 to this report.

Step 4: **What can be done in mitigation to maximise enhancements and avoid harm?**

Mitigation of the development’s impact on built heritage would be achieved in a number of ways.

Where new build walls in proximity to historic buildings (such as East and West Sherford, Butlas, Wiverton House and Wiverton), impacts would be mitigate by a number of design measures.

Design of the new buildings is intended to create houses of varied and distinct character. Architectural detail using local and regional pattern books to inform design and establish a varied and interesting townscape. The sensitive treatment of development boundaries with existing buildings through use of soft landscaping, appropriate material choices and planting. This would aid the integration of the new development with the surrounding landscape, decreasing its landscape impact upon existing historic buildings.

The landscape impact of the development upon Saltram Park would be mitigated by the maintenance of a green edge to the development along its western boundary.
A programme of archaeological investigation and recording conditions to mitigate effect of the development on surviving historic landscape features (see below).

Detailed proposals for the new buildings around West Sherford will mitigate the impact of the development as far as possible through the use of appropriate materials, design and detailing, and boundary treatment.

Residual effects would be a high level of change to the rural landscape and the setting of buildings close to the development areas would be subject to complete change. The development would have significant adverse effect on the setting of the Grade II listed farmhouse at West Sherford. Although landscaping is proposed to screen the farmhouse complex within the development, its historic relationship with the surrounding landscape will be lost.

The community park proposed for the southern part of the development site would ensure the preservation in situ of known, unknown and suspected archaeological sites and preserve extensive areas of the historic landscape.

The development would have a significant adverse effect on the setting of the Scheduled Ancient Monument, Wasteberry Camp Iron Age hillfort, to the east of the development. The urban/sub-urban landscape that would replace the current rural agricultural setting of the monument would not encroach within 1km of its curtilage.

The construction of the wind turbines within the community park would also have an impact on the wider landscape seeing of the monument. A significant, moderate adverse effect would, however, occur on the setting of the monument.

The outline consent included conditions as set out below. Subsequently reserved matters applications have been approved with the necessary details:

**Design Codes**

12. All applications for Reserved Matters approval shall be accompanied by a Design Statement which shall explain how the proposal conforms to the requirements of the approved Detailed Design Code submitted pursuant to condition 6 above, for that Reserved Matters site.

Reason: To ensure that the development as envisaged by the outline application is satisfactorily implemented.

13. All Reserved Matters applications shall comply with the principles set out in the approved Masterplan Book and Masterplan Book Addendum May 2009 and each application shall demonstrate how the principles of that Masterplan have been applied.

Reason: To ensure that the development as envisaged by the outline application is satisfactorily implemented.
Archaeology

93. No development shall take place on the site until a Written Scheme of investigation has been submitted to and approved in writing by the Local Planning Authority and the implementation of a programme of archaeological work in accordance with such approved Written Scheme of Investigation has been secured.

Reason: To ensure that a record of archaeological features is made and kept available for inspection and that any revealed features of importance may be retained if necessary.

94. If, during the course of the works of development, archaeological features not previously identified are found to be present, work shall immediately stop until the Local Planning Authority has approved the means of the retention or recording of those features.

Reason: To ensure that a record of such features is made and kept available for inspection and that any revealed features of importance may be retained if necessary.

95. Access shall be afforded at all reasonable times to any archaeologist nominated by the Local Planning Authority to observe the excavations and record items of interest and finds.

Reason: To ensure that a record of such features is made and kept available for inspection and that any revealed features of importance may be retained if necessary.

Local Materials

97. The development hereby approved shall wherever practicable be constructed with materials sourced as follows:

a) Up to 65% of bulk materials (by mass) and in any event no less than 35% of bulk materials (by mass) shall be derived from local sources (within 50 miles by road) of the development;

b) The materials used in the construction of road and external hard surfaces within the development hereby approved shall utilise a 30% recycled content from local (within 50 miles by road) reclaimed or recycled sources;

c) All bulk building materials to be used within the construction of the development hereby approved shall include 15% (as a percentage of the value of materials used) recycled content;

d) 100% of construction timber used in the construction of the development hereby approved shall be Forest Stewardship Council certified or equivalent and preference shall be given to renewable locally sourced and milled timber from within the Devon or South West area.

Reason: To reduce the distance building materials to the site are required to travel in the interests of sustainability, and also the local economy.
Step 5: Is the proposed site allocation appropriate in light of the NPPF’s tests of soundness?

Consideration was given to historic landscape character, heritage assets and archaeological interest when making a decision on the planning application and, subsequently, issuing the planning permission. This included advice from the Devon County Council Historic Environment Team.

This resulted in the inclusion, in the Decision Notice, of conditions relating to archaeology, design and use of local materials that reflects NPPF (paragraphs 126, 129, 131-135 &139) by providing a positive strategy for the conservation of historic environment, and assessment of its significance.
Site: Langage
Allocation: Employment
NGR: SX568558

Constraints / things the development should provide for:

Future consents within the Langage park boundary should take account of heritage assets: Lower Langage Farm House, Grade II (UID: 1107438); Ley Farm House, Grade II (UID: 1107401), and; Lineham Inn, Grade II (UID: 1325444) which could directly border future development boundaries.
Step 1: Are any heritage assets affected by the potential site allocation?

Ref: Map from Historic England website showing the sites listed below

- Chaddlewood House, Grade II (UID: 1322041)
- Triangular Folley, Grade II (UID: 1130046)
- Lower Langage Farm House, Grade II (UID: 1107438)
- Ley Farm House, Grade II (UID: 1107401)
- Lineham Inn, Grade II (UID: 1325444)

There are 26 non-designated archaeological assets within 1.5 km of the consented solar farm which are identified and considered in detail in the Heritage Statement (January 2011) which accompanied the solar farm planning application. These are shown on the map at Appendix 3 to this report.

Step 2: What contribution does the site make to the significance of the heritage asset?

The site is an established business park with power station and solar park in the north and eastern extent of the site. The assets listed above are located outside the boundary of the allocated site and there is no inter-visibility other than Lower Langage Farm House which is dealt with in more detail below. The site does not make a positive contribution to the setting of the other heritage assets and has extremely limited contribution to the significance of the heritage assets due to the absence of inter-visibility resulting from landform, intervening buildings and mature vegetation/trees providing screening.

Step 3: What impact will the site allocation have on that significance?

The allocation of the site will have no discernible impact on the significance of the heritage assets due to lack of inter visibility and the potential, therefore, for additional development will not alter the setting and therefore significance of the assets.
Step 4: **What can be done in mitigation to maximise enhancements and avoid harm?**

With reference to Lower Langage Farm House, the most recent consent for development immediately adjacent to this site includes a heritage impact assessment and comments from Heritage England is 49/0277/11/F.

The officer report stated:

“The panel array closes to the grade II listed building group at Lower Langage Far is set beyond one of the groups of trees along a major hedgebank. This will provide separation as well as visual screening. The main group of ancillary structures serving the solar park is to the north of the farm group within an area that has already been disturbed by construction and demolition. Hedgebanks separate the area from the listed building. Given the proposes long term use of the site and the existing use of the buildings and surrounding land in combination with the low impact development proposed, it is considered that the development will not have any significant detrimental impact on the setting of the listed buildings."

Significant landscape works have already been undertaken in the form of bunds and woodland planting which is now approximately 9 years old and so is a relevant landscape context which contributes to screening the existing solar farm but also other future buildings which are anticipated on this site.

The allocation does not in itself result in any removal of trees or hedgebanks. These elements will be the subject of more detailed scrutiny as individual planning applications come forward.

The consent 49/0277/11/F also includes a condition securing the implementation of a programme of archaeological work:

**Condition 6.**

*No development shall take place until the applicant has secured the implementation of a programme of archaeological work in accordance with a written scheme of investigation which has been submitted by the applicant and approved by the Planning Authority. The development shall be carried out at all times in strict accordance with the approved scheme, or such other details as may be subsequently agreed in writing by the District Planning Authority.*

*Reason: To ensure that an appropriate record is made of archaeological evidence that may be affected by the development.*

The approved solar farm is a temporary consent for a period of up to 25 years. After its removal the land will either be returned to its previous use or new planning applications will be considered on their merits. In either case, the approved landscape features and planting will remain and form part of the site context within which new consents are considered, therefore providing ongoing screening properties for future development.
Step 5: *Is the proposed site allocation appropriate in light of the NPPF’s tests of soundness?*

Where an existing consent (49/0277/11/F) is immediately adjacent to a heritage asset, that consent, as described above, has given consideration to historic landscape character, heritage assets and archaeological interest. This resulted in the inclusion, in the Decision Notice, of conditions relating to archaeology that reflects NPPF (paragraphs 126, 129, 131-135 & 139) by providing a positive strategy for the conservation of historic environment, and assessment of its significance.

The other identified heritage assets are sufficiently remote from the site with no intervisibility and so no further consideration is necessary.
### Appendix 2

<table>
<thead>
<tr>
<th>Sensitive Receptor</th>
<th>Impact</th>
<th>Effect</th>
<th>Mitigation Measure(s)</th>
<th>Residual Effect</th>
</tr>
</thead>
<tbody>
<tr>
<td>B9 Hawarden</td>
<td>Maintenance of the open landscape to the west of the farm through establishment of the Community Park.</td>
<td>Not Significant Navigable</td>
<td>No specific measures required</td>
<td>Not Significant Navigable</td>
</tr>
<tr>
<td>B10 Bailham Park</td>
<td>Urbanisation of open landscape setting through construction of large numbers of housing to the east.</td>
<td>Not Significant Moderate Adverse</td>
<td>Soft landscaping and planting</td>
<td>Not Significant Low Adverse</td>
</tr>
<tr>
<td>B11 Plympton House</td>
<td>Current setting maintained to north of A18 and within built up area of Plympton.</td>
<td>Not Significant Navigable</td>
<td>No specific measures required</td>
<td>Not Significant Navigable</td>
</tr>
<tr>
<td>Sensitive Receptor</td>
<td>Impact</td>
<td>Effect</td>
<td>Mitigation Measure(s)</td>
<td>Residual Effect</td>
</tr>
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<td>-------------------</td>
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</tr>
<tr>
<td>B1 West Sherford Farm</td>
<td>Permanent indirect impact on setting through extensive construction of housing within the open rural landscape</td>
<td>Significant High Adverse</td>
<td>Detail design and landscaping</td>
<td>Significant Moderate Adverse</td>
</tr>
<tr>
<td>B2 East Sherford Farm</td>
<td>Permanent indirect impact upon setting due to the development of the surrounding rural landscape with housing.</td>
<td>Not Significant Moderate Adverse</td>
<td>Detail design and landscaping</td>
<td>Not Significant Low Adverse</td>
</tr>
<tr>
<td>B3 Buttas Farm</td>
<td>Permanent indirect impact upon the setting of the complex through the construction of new build to completely enclose the complex, resulting in total urbanisation of the surrounding rural landscape.</td>
<td>Not Significant Moderate Adverse</td>
<td>Detail design and landscaping</td>
<td>Not Significant Low Adverse</td>
</tr>
<tr>
<td>B4 Sherford Kins</td>
<td>The kilns would be maintained in their current condition within the quarry resulting in a negligible impact</td>
<td>Not Significant Negligible</td>
<td>No specific measures required</td>
<td>Not Significant Negligible</td>
</tr>
<tr>
<td>B5 Higher Hareston</td>
<td>Establishment of Community Park to west of building complex. Open landscape maintained although altered in character.</td>
<td>Not Significant Moderate Adverse</td>
<td>No specific measures required</td>
<td>Not Significant Moderate Adverse</td>
</tr>
<tr>
<td>B6 Wollaton</td>
<td>Establishment of Community Park to north of building complex would maintain the surrounding open landscape, although altering its character.</td>
<td>Not Significant Negligible</td>
<td>No specific measures required</td>
<td>Not Significant Negligible</td>
</tr>
<tr>
<td>B7 Wiverton House</td>
<td>Urbanisation of the wider landscape setting through construction of housing within 0.25km, a park and ride facility to the northwest and sports facilities to the south.</td>
<td>Not Significant Moderate Adverse</td>
<td>Detail design and landscaping</td>
<td>Not Significant Low Adverse</td>
</tr>
<tr>
<td>B8 Wiverton</td>
<td>The setting of the complex would be subject to urbanisation with the construction of housing within 0.25km, a park and ride facility to the northwest and sports facilities to the south.</td>
<td>Not Significant Low Adverse</td>
<td>Detail design and landscaping</td>
<td>Not Significant Negligible</td>
</tr>
<tr>
<td>Scenario</td>
<td>Mitigation Measures</td>
<td></td>
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<tr>
<td>No Significant Impact</td>
<td>Mitigation measures not required.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Significant Impact</td>
<td>Mitigation measures required.</td>
<td></td>
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</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Mitigation Measures</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Mitigation measure 1</td>
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</tr>
<tr>
<td>Mitigation measure 2</td>
<td>Description 2.</td>
</tr>
<tr>
<td>Mitigation measure 3</td>
<td>Description 3.</td>
</tr>
</tbody>
</table>

Note: This table provides a summary of the mitigation measures required for different scenarios. Further details for each measure can be found in the comprehensive report.
<table>
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</thead>
<tbody>
<tr>
<td>HLC 1 Medieval ship fields</td>
<td>Permanent, direct, high adverse impact on medieval enclosure fields resulting from construction activities.</td>
<td>Significant High/Moderate Adverse</td>
<td>Parts of the HLC type shall be preserved with Not Significant, the Community Park. Within the development area, low adverse would be preserved in the design where possible.</td>
<td></td>
</tr>
<tr>
<td>HLC 2 Medieval enclosures</td>
<td>Permanent, direct, high adverse impact on medieval enclosure fields resulting from construction activities.</td>
<td>Significant High/Moderate Adverse</td>
<td>Parts of the HLC type shall be preserved with Not Significant, the Community Park. Within the development area, low adverse would be preserved in the design where possible.</td>
<td></td>
</tr>
<tr>
<td>HLC 3 Barton fields</td>
<td>Permanent, direct, high adverse impact on medieval enclosure fields resulting from construction activities.</td>
<td>Not Significant Moderate Adverse</td>
<td>Much of the HLC type would be preserved with Not Significant, the Community Park. Within the development area, low adverse would be preserved in the design where possible.</td>
<td></td>
</tr>
<tr>
<td>HLC 4 Post medieval enclosures with medieval elements</td>
<td>Permanent, direct, high adverse impact on medieval enclosure fields resulting from construction activities.</td>
<td>Not Significant Moderate Adverse</td>
<td>Much of the HLC type would be preserved with Not Significant, the Community Park. Within the development area, low adverse would be preserved in the design where possible.</td>
<td></td>
</tr>
<tr>
<td>HLC 5 Post medieval enclosures</td>
<td>This HLC type would be preserved within the Community Park resulting in a negligible impact.</td>
<td>Not Significant Negligible</td>
<td>No specific measures required with Not Significant Negligible</td>
<td></td>
</tr>
</tbody>
</table>