

NPS 0373A

PLYMOUTH CITY COUNCIL – NORTH PLYMSTOCK AREA ACTION PLAN PUBLIC EXAMINATION

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DPD/ID number: NP 0373

The Test of Soundness: Test 7E

Examination Issue: Whether the AAP has taken sufficient account of the setting of Saltram House and the Plympton St Maurice Conservation Area.

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The Setting of Saltram Park (Part 2)

Examination Issue:

Whether the AAP has taken sufficient account of the setting of Saltram House and the Plympton St Maurice Conservation Area.

1.0 What is not sound:

- 1.1 The case set out here is that the North Plymstock AAP (NPAAP) is unsound in relation to test 7, as it fails to put forward an appropriate policy for protecting the setting of the historic park and garden at Saltram. Saltram, a cultural asset of national importance (the house being Grade I listed and registered park and garden being Grade II* listed).
- 1.2 The NPAAP is also unsound in that insufficient account has been taken of the setting of Saltram with regard to Proposal NP01. The most westerly field on the Plymstock Quarry north facing slopes is included within this proposal, but excluded from the proposed Countryside Park (NP11), with no justification about why this decision has been taken. In addition insufficient consideration has been given to the sensitivity of the open land east of the quarry, which is visually important as the skyline in views from Saltram house and other viewpoints in the park, and yet falls within an area identified for development (under Proposal NP01 and on the Character Framework plan, p.16)
- 1.3 Further to the above issues in relation to Proposal NP01 the National Trust has also made a representation on the Site Allocations Representations (no. NPS/1946) concerning the omission of Wixenford Quarry as a residential allocation forming part of Plymstock Quarry. The Trust believes the inclusion of Wixenford as a residential allocation would be unsound.
- 1.4 There is also an issue of whether sufficient account has been taken of the impacts on Saltram from the proposed westwards expansion of Sherford, covered by Proposal NP16. This will be considered in detail in the National Trust statement on the options for the location of housing, but mention will be made here of the issue of transport links.

2.0 The Protection of the Setting of Saltram:

- 2.1 The Core Strategy (CS) puts forward a policy for the safeguarding and enhancement of historic environment interests of acknowledged importance (Policy CO3). The National Trust made representations on this policy to the Core Strategy Public Examination highlighting the importance of *setting* and the fact that historic parks and gardens, which are national designations, are of equal importance to the other historic assets listed in the policy, and that this importance is independent of any listed buildings that fall within them. As a result of this representation, in a statement of suggested changes to this section of the Core Strategy (PCC General 02 Design), the City Council have accepted that consideration should be given to inclusion of registered parks

and gardens within the wording of this policy and also to reference being made specifically to the *setting* of historic assets.

- 2.2 Para. 4.29 of the submitted Core Strategy states that specific policies for the protection and enhancement of heritage assets will be outlined in the relevant Area Action Plans. The Draft Regional Spatial Strategy policy ENV1 stresses that in the protection and enhancement of such assets priority should be given to sites of international or national importance. In recognition of the national significance of Saltram the National Trust believe that the NPAAP should contain a development control policy that specifically protects the setting of its historic park and garden.
- 2.3 The principle that there is a setting to registered parks and gardens, such as Saltram, is well established and PPG15 advises that not only should local authorities protect registered parks and gardens in preparing development plans, but it makes clear that 'the effect of proposed development on a registered park and garden or its *setting* is a material consideration in the determination of a planning application' (para. 2.24). PPG 15 also highlights that the value and interest of historic properties can be seriously harmed if they lose a connection with their surroundings. However, English Heritage in its *Register of Parks and Gardens of Special Historic Interest* does not currently provide an assessment of setting or map setting spatially. This leaves decision makers to determine case-by-case what constitutes the setting to be protected and can lead to inconsistency.
- 2.4 The problems associated with a lack of an agreed understanding over *setting* are self evident in relation to Saltram with the issues that are arising from the emerging proposals for Plymstock Quarry. The National Trust continues to support the principle of the development of Plymstock Quarry, however it has serious concerns over how it will impact on the setting of Saltram.
- 2.5 It is in everyone's interest that the Local Development Framework provides clarity in guiding future development and the use of land. It would aid the implementation of the plan, and the interpretation of CS policy CO3, if it is not only made clear what is meant by 'setting' but that the areas of sensitivity are identified spatially. With a view to assisting in this process the National Trust has now carried out a robust assessment of the setting of Saltram (Part Two of the study carried out for the National Trust by the *Parks Agency* is attached as Appendix1).
- 2.6 Following the practice of Cadw, the Welsh Assembly Government's historic environment division, areas of 'essential setting' and 'significant views' have been plotted on an existing version of the *Register* map. The areas designated as setting are based on the criteria established by Cadw who define 'essential setting' as:
- a concept developed for the register in order to safeguard areas adjacent to the historic parks and gardens which, although outside them, form an essential part of their immediate background and without which, in their present state, the historic character of the site in question would be diluted or damaged.*
- 2.7 Significant views have been restricted to those which were evidently part of the eighteenth and nineteenth century landscape design. Although both surviving views and those which have been blocked, due mostly to tree growth or recent

planting, have been identified, only the views which still exist have been indicated on the *Register* map.

- 2.8 As part of this study, in the light of new historical and field evidence, the *Register* boundary has also been reviewed. This has been carried out by the *Parks Agency* in collaboration with the former English Heritage inspector, who produced the present *Register* entry and map. Suggested revisions to both entry and map have been submitted to English Heritage for their consideration. These are reproduced in Appendix 2 to the study (that is attached as Appendix 1 here).
- 2.9 The research that has been undertaken has confirmed that the extent of the eighteenth and early nineteenth-century landscape design was significantly more extensive than previously understood. The *Register*, although based on the best evidence at the time, does not recognise this extent. The *Parks Agency* study particularly draws attention to the fact that the current boundary of the registered landscape fails to acknowledge the historic importance of Pomphlett Plantation, and asserts that it was an integral part not only of the visual backdrop to the park but also part of the circuit ridings. The study has also uncovered the integral role of the arch at Boringdon in Saltram's design.
- 2.10 It remains uncertain if English Heritage will alter the boundary and description of the registered landscape, in light of this new research, but it is nonetheless critical that the areas that are discussed are considered within the context of the Area Action Plan as part of the essential setting of the existing registered landscape, and that the designed views be noted. Harm to either the setting or these views would have a significant impact on the registered landscape, contrary to local and national policy.

3.0 Plymstock Quarry (Proposal NP01)

- 3.1 The most westerly field on the Plymstock Quarry north facing slopes is included within proposal NP01 for Plymstock Quarry, but unlike the other north-facing meadows, is excluded from the proposed Countryside Park (NP11), with no justification about why this decision has been taken. Not only does the 'Saltram Historic Survey and Management Plan' (1999) include this within the 'essential setting' to the designed landscape at Saltram but the 'Character Framework' of the North Plymstock Area Action Plan (p.16) clearly identifies this field as falling within the 'wider Saltram setting'. In 2005, in the context of the withdrawn planning application for Plymstock Quarry (05/00475), consideration was given to this area as a school playing field, however the new study on setting of Saltram Park by the *Parks Agency*, mentioned above and attached as Appendix 1, highlights further how all the northern meadows are an integral part of the designed landscape. This study makes clear that because of their historic and visual significance they should be included within an extended *Register* boundary; this forms part of the case recently submitted to English Heritage for their consideration.
- 3.2 Given the historic significance of all these fields, including the most westerly one, it is critical that the NPAAP acknowledges their importance to the setting of Saltram and that they adequately protected. Following the sequential approach to development advocated in RSS Policy ENV1, it is necessary for development that impacts on this area to be justified as to how the need for it outweighs the

harm that will be caused, and for it to be demonstrated that alternatives to development of this area have been considered.

- 3.3 It is also not clear from Proposal NP01 that adequate consideration has been given to the sensitivity of the open land east of the quarry which falls within the area identified for development (under Proposal NP01 and on the Character Framework plan, p.16) . The study on setting of Saltram Park by the *Parks Agency*, identifies this land to be visually important as the skyline in views from Saltram house, and other viewpoints in the park. The importance of views *to* and *from* this area are underlined by the fact that it is the subject of one of the three larger estate views by William Tomkins, dated 1778, now hanging in Saltram House, and this view has changed very little since that time.
- 3.4 Persimmon have made a Site Allocations Representation (no. NPS/1946) with a proposal that Wixenford Quarry be made a residential allocation forming part of Plymstock Quarry. However Wixenford Quarry is within the extent of the 'designed landscape' at Saltram established in the 1999 Historic Survey and Management Plan, and forms part of the 'essential setting' to the registered park and garden, as identified in appended *Parks Agency* study. The sensitivity of this area is highlighted further by how it is encircled by the new suggested *Register* boundary.
- 3.5 It is accepted that the landscape quality of this area of Wixenford has been damaged as a result of the quarrying, however development within the quarry would nonetheless impact on landscape character and harm the connection of Saltram with its surroundings. Regardless of the degree of visibility of any proposed buildings within the quarry, the access would have a significant visual impact with the associated environmental impacts of street and car lights. There would also be indirect impacts from the close proximity of housing; with urban fringe pressures raising ecological and management issues (further consideration of such urban fringe pressures is given in the National Trust statement on the options for the location of housing). It is very doubtful if mitigation could resolve these concerns. There has been no robust assessment of the impact of the proposed development of Wixenford Quarry on the setting of Saltram.
- 3.6 The Plymouth Eastern Corridor Urban Fringe Study (2006) sets a vision for the Eastern Corridor and one of its proposals is that Wixenford Quarry will form part of the Northern Fields Country Park and not only be retained as an important habitat reserve but "will also play an important role in creating the 'outer setting' to the Saltram Estate" (section 7.2, p.43). The North Plymstock AAP builds on the Urban Fringe proposals and the 'character framework' of the AAP (p.16) and shows Wixenford Quarry as within the 'Wider Saltram Setting' where the aim is to "promote a wider complementary setting that is sensitive to the character of the Saltram Estate, and providing a backdrop to the park"; the AAP includes the site within the proposed Countryside Park (Proposal NP11). The NPAAP also develops the idea that Wixenford Quarry be retained as an important habitat reserve and proposes the *creation of wildlife ponds / wetlands within Wixenford Quarry as mitigation for wetlands lost elsewhere* (under NP01).
- 3.7 Just to the north-east of Wixenford Quarry is Wixenford Brake, a part wooded valley located at the far southern part of the Saltram Estate, which has been the subject of a restoration project, undertaken by the Trust, in partnership with Plymouth City Council. This project aims to facilitate natural regeneration in

order to enhance the appearance and nature conservation interest of this area, improve public access and create an educational resource. It was envisaged that the Wixenford Quarry habitat reserve would ultimately be included as part of this project.

- 3.8 Development of Wixenford quarry also raises broader planning issues in that it would not be very well integrated with the rest of Plymstock Quarry development and for such a proposal to be sound, under test 3, it needs to be subject to a sustainability appraisal.

4.0 Transport Links associated with Plymstock Quarry and Sherford

- 4.1 Proposal NP 01, as well as identifying the land to east of the quarry for development, as mentioned above, it proposes a 'secondary' vehicular access into the Plymstock Quarry site from Colesdown Hill (para 46). This general vehicular access had not been proposed at 'preferred options' stage nor as part of the planning application submitted in 2005 by Westbury Homes (Appln no: 05/00475); although a bus/ emergency vehicle only link onto Colesdown hill had been proposed this had been shown further south. The access that is now proposed is through an area that the *Parks Agency* study, identifies as being within the 'essential setting' of Saltram, and the North Plymstock AAP character framework establishes as part of 'Wider Saltram Setting' where the aim is to "promote a wider complementary setting that is sensitive to the character of the Saltram Estate". There are significant concerns over the impact that this access will have on the setting of Saltram. This area is also rightly to be included within the proposed Countryside Park (Proposal NP11) and this designation should take priority over a proposed access which has yet to be justified.
- 4.2 Part of the NPAAP justification for the development of the area west of Sherford (covered by Proposal NP16) is that it would allow transport links with the planned development at Plymstock Quarry. However it is not clear what transport links are envisaged. Pedestrian and cycle links between Sherford and Plymstock Quarry seem to be proposed (Proposal NP13) regardless of any westwards expansion of Sherford. What the plan does state is that: "There is *also* a potential opportunity to create a new road link (between) Sherford and Haye Road" (5.63), and yet the implications of this are not considered. This could harm the setting of Saltram, in particular the setting of the listed Stag Lodge, and were Colesdown Hill opened this would increase pressure on this sensitive location. Beyond that it could further limit the potential to find appropriate management for the narrow band of fields that will remain between Saltram and the new development and this new vehicular artery though the proposed Countryside Park could work against the aim to integrate the green spaces, as originally envisaged in the Eastern Corridor Urban Fringe study (LDA,2006;33).

5.0 How the plan can be made more sound:

- 5.1 Given the historic importance of Saltram and in light of the important new research into its 'setting' it is critical that the AAP has an appropriate policy to ensure the protection of this significant cultural asset and that areas of sensitivity are identified spatially. The National Trust recognises the need to accommodate new development to meet the future needs of the Plymouth Sub

Region but present development pressures are such that the threat exists of Saltram losing a valuable connection with the surrounding landscape that would permanently harm the significance and interest of the property. The National Trust is mindful that the draft Regional Spatial Strategy identifies that cultural and environmental assets are a key strength of the South West (2.2.2) and should be “at the heart of the strategic approach to managing growth” (7.2.1).

5.2 A suggested policy wording is as follows:

Planning permission will not be granted for any development proposals that would have an adverse impact on the Registered Park and Garden at Saltram, its essential setting, or the significant views into and out of the designed landscape identified on plan.....

5.3 Proposal NP01 also needs to have more regard to the setting of Saltram, and the development capacity of Plymstock Quarry needs to be reviewed in light of new evidence on the historic importance of the landscape surrounding Saltram.

5.4 Housing proposal NP16 should be omitted as inadequate consideration has yet been given to the impacts of such a proposal, or the capacity of the area to accommodate such growth.

References

LDA Design (Aug 2006), *Plymouth Eastern Corridor urban fringe study*
Nicholas Pearson Associates (Nov 1999) *Saltram: Historic Landscape Survey and Management Plan*
SWRA (June 2006) *Draft Regional Spatial Strategy for the South West*
SWRA (June 2006) *Strategic Sustainability Assessment of RSS*
The Parks Agency (Feb 2007), *The Setting of Saltram Park, Part 2* -Attached as Appendix1

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Appendix 1: The Setting of Saltram Park (Part 2)

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