

# NPS 0373C

## PLYMOUTH CITY COUNCIL – NORTH PLYMSTOCK AREA ACTION PLAN PUBLIC EXAMINATION

**Representor:** The National Trust  
*Michael Calder BA MA MRTPI*  
*Land Use Planning Adviser*

**DPD/ID number:** NP 0373

**The Test of Soundness:** Test 7F

**Examination Issue:** Whether the AAP should contain more detail on the options for the location, timing and delivery of housing.

**Statement Contents:**

1.0	What is not sound	3
2.0	Background and areas of Agreement	3
3.0	Has the location to the west of Sherford, which is identified as having the potential for long-term growth, been justified and have the alternatives been fully considered?	4
4.0	What is the strategic vision for the area to the west of Sherford and what capacity is there to accept development?	5
	Cultural Sensitivity/ Impact on the historic landscape of Saltram	6
	General visual sensitivity	6
	Ecological sensitivity and potential impact on Saltram	7
	The area as a productive landscape and as a recreational resource	7
	Transport links	8
5.0	Proposal NP01	8
6.0	How the plan can be made more sound	8
	<b>Appendix 1:</b>	<b>10</b>
	The Setting of Saltram Park (Part 1)	

**Examination Issue:**

**Whether the AAP should contain more detail on the options for the location, timing and delivery of housing.**

**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 two of the housing proposals, NP01 and NP16.
- 1.2 The NPAAP plans for the future long term growth west of Sherford with proposal NP16 safeguarding land to the north of Hazeldene Quarry for its potential to accommodate long term development, beyond 2021. The *Cross Border Strategy Diagram*, included as p.10 of the NPAAP, also illustrates spatially the potential direction and location for future development/ growth west of Sherford. This is unsound as it prematurely identifies the area as having the potential for long term growth and supports the potential for long term development west of Sherford, before this has been properly tested.
- 1.3 With regard to Proposal NP01 a number of questions arise in relation to the area covered by the proposal and how development within this area may impact on the setting of Saltram. The most westerly field on the Plymstock Quarry north facing slopes, which is an integral part of the designed landscape at Saltram and within the 'essential setting', 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 to the east of the quarry ('Colesdown hilltop'; character framework, p.16), which is identified for development. These issues will be considered in detail in the National Trust statement on *the setting of Saltram*.
- 1.4 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. Again this issue is considered in the National Trust statement on *the setting of Saltram*, where a case is made that such an allocation would be unsound.

**2.0 Background and areas of agreement:**

- 2.1 The National Trust recognises the need for the eastern corridor of Plymouth to accommodate new development to meet the future needs of the City. The Trust continues to support the principle of a new community at Sherford and the development of Plymstock Quarry, on the basis that the approach being taken is to deliver high quality sustainable developments. However the Trust is concerned about whether sufficient account is being taken as to how these developments will impact on Saltram.
- 2.2 The National Trust is concerned about the proposals that have emerged for the long term growth of Sherford. In September 2005 The National Trust raised objections to the North Plymstock AAP, at Preferred Options stage, with regard to identification of the potential direction of future growth as premature in advance of a clear justification of need and without an assessment of the environmental capacity of the area to accommodate further development. Whilst PCC now seem to agree that the need is not yet established for growth to the west of Sherford, there is still concern as to the way in which a proposal for such growth is coming forward.
- 2.3 The National Trust is also concerned about the specific proposals that are emerging for the development of Plymstock Quarry. A letter of objection to the current planning application for remodelling the quarry has submitted to Plymouth City Council (Appln No: 06/02048/FUL).

**3.0 Has the location to the west of Sherford, which is identified as having the potential for long-term growth, been justified and have the alternatives been fully considered?**

- 3.1 The option that future growth of Sherford should be in westerly direction towards Plymouth came forward through the EbD process, and the justification given for this approach has been based on the idea that there should be a defensible eastward boundary for the community (Sherford AAP Topic Paper,01, 3.5; Sherford AAP,12.12), The option was also highlighted through the 2005 Sustainable Growth Study (SGS) although this makes clear that the area still needs to be subject to 'close examination' and identifies the need for a strategic vision (11.13).
- 3.2 Policy NP16 states that the land to the north of Hazeldene Quarry has the potential to accommodate long term development without it being made adequately clear that such a proposal has yet to be tested, or without having set out alternative options for growth. The NPAAP states that, in principle, the growth of Sherford back towards the City is regarded as a "sustainable and appropriate approach"(5.63). However neither the AAP, nor its SEA/SA, explains exactly how this approach is seen as sustainable or how it is justified as *appropriate*. All the SGS states is that the area is well located to the existing urban area (11.16). It is also not clear why there is a need for a policy to *safeguard* this land any why it cannot be protected by other means.
- 3.3 It is important to first consider if the *expansion* of Sherford is really necessary to accommodate growth. The alternative of higher densities within the area defined in the Sherford Area Action Plan should be considered now if 'future expansion' is being contemplated and a case on this basis has been submitted to the PCC and S Hams joint session. It is not yet clear exactly what level of development, beyond 5,500 dwellings, is capable of being accommodated within the area defined in the Sherford AAP, but it is possible that Sherford

could be designed with a final phase, within the current planning application boundary, that provides the potential for longer term growth, should this ever be needed, without contemplating the further westwards expansion of Sherford and identifying additional greenfield land for development.

#### **4.0 What is the strategic vision for the area to the west of Sherford and what capacity is there to accept development?**

- 4.1 It is necessary to be clear as to exactly what the vision is for this part of Plymouth, specifically in relation to how Sherford is intended to relate to the city. Although Sherford is to be a sustainable new community, it is seen as an *urban extension* (RSS, policy SR35) but little consideration is given in the emerging planning framework as to exactly how the North Plymstock area should function in terms of providing a green buffer/wedge. RSS Policy F on 'Master Planning', seeks to ensure that the new communities are planned so as to protect and maintain environmental assets and landscape setting, and the Plymouth CS identifies that the "LDF's task must be to protect and enhance the city's natural heritage and its unique setting" (11.10).
- 4.2 The *Greenscape Assessment* for Plymouth (LUC, 2000) identifies that the city has a unique character in some areas because of the way it is permeated by agricultural land, and it specifically cites the land between Plympton and Plymstock (p.91). The study goes on to highlight that the open countryside to the east of Saltram, up to Vinery Lane, performs an important 'green wedge function' (p.161), with the Environmental Capital Evaluation (Appendix C) assesses its level of contribution as 'significant', and the report establishes an objective to 'protect and maintain' this strong green wedge (p.161).
- 4.3 With the development of the Sherford new community to the east of Vinery Lane the importance of a green wedge function to the west increases and the recently published Plymouth Eastern Corridor Urban Fringe Study (LDA,2006) puts forward a concept plan (p.38) which envisages a 'Buffer Landscape' and a 'Recreation and Productive landscape' between Sherford and Saltram. This study is clear that when Sherford is built, this land to the west will become an annexed tract of countryside subject to urbanising influences and that: "Part of the vision of this area is to *counter* this potential effect and to create a large tract of land of sufficient scale and importance to mark it out as a major city-wide and regional asset". (p.34)
- 4.4 Given that the Greenscape Assessment and the Urban Fringe Study both make a strong case for maintaining a green wedge function in this location then the NPAAP should consider what role this green wedge should play following the development of Sherford, and what capacity there is to accept further development in this area without damaging its intrinsic value. The Greenscape Assessment notes that whilst most of the land to the east of Saltram does not, in itself, demonstrate strong landscape qualities, "incremental development on greenfield sites would erode the open character of this area and its green wedge function" (p.103) and the Greenscape Update in 2004 highlights that: "*Any development* would be highly undesirable" (LUC, 2004, 45).
- 4.5 The issue of the sensitivity of the area between Saltram and Vinery Lane and the impact the proposed westwards expansion of Sherford will have will be considered first before going on to assess whether the concept of a recreation and productive landscape can be sustained:

## **Cultural Sensitivity/ Impact on the Historic landscape of Saltram**

- 4.6 Saltram is a cultural asset of national importance (the house being Grade I listed and registered park and garden being Grade II\* listed). Part One of a recent study on *The Setting of Saltram Park* (Parks Agency(PA), 2006), attached as Appendix1, highlights how the area to the east of Hays Road up to Vinery Lane, which was part of the Saltram Estate from the late C18th, forms an important part of the historical and visual context of the park itself, and how its current agricultural character is 'appropriate' to Saltram (PA,2006;15,20,21). Because of the physical relationship of this area to the listed Stag Lodge entrance, opened in 1824, and the approach to the house via Hardwick Wood, opened 1810, it formed part of the aesthetic experience of the designed landscape when viewed from these approaches. The area should be seen in terms of the understanding of setting as a layered concept (PA,2006;18,20).
- 4.7 Hardwick Wood is an integral part of the designed landscape, and in light of new historical and field evidence a case is made in the National Trust statement on *the setting of Saltram* that it should be considered 'essential setting' to the existing registered park and that the designed views which still exist from this location, south-eastwards, are of significant importance. The development of the area proposed for the westwards expansion of Sherford will impact significantly on these views, as well as harming the landscape quality and visual context of the approaches to the Stag Lodge entrance (PA, 2006;14,20,21). This will damage the significance and interest of Saltram.
- 4.8 Agricultural management, in the form of grazing, is an intrinsic part of the character of Saltram's parkland; not only does this historic land use provide the appropriate appearance to the designed landscape, it maintains biodiversity and the special character of the site as a public amenity, and is key to its conservation-management under Countryside Stewardship (PA, 2006;27,30). The proposed westwards expansion of Sherford will reduce the agricultural viability of the remaining land immediately to the east and this would in turn threaten the viability of grazing at Saltram itself (PA, 2006;27).
- 4.9 Increased use of the park at Saltram by a local population, which is to grow significantly in size and proximity, will also conflict with the agricultural use and increase pressure to 'sanitise its character' (PA, 2006;32). There would be an increase in the problems associated with an urban fringe location already experienced at Saltram such as fly-tipping, vandalism, uncontrolled dogs, illegal cycling and general maintenance and repair stemming from heavy use (PA, 2006;21,28-32). While the NPAAP proposes that a few fields east of Saltram up to the development area will be designated as part of a Countryside Park, to be discussed below, Saltram would remain the principal recreational space (PA, 2006; 21).

## **General Visual Sensitivity**

- 4.10 As well as the impact on visual context of the historic landscape at Saltram, there is the issue of general visual intrusion. The Urban Fringe Study highlights that the westwards expansion of Sherford could have a significant impact on the landscape setting of Plymouth (p.43). In the Greenscape Assessment the *Environmental Capital Evaluation* indicates that the open countryside to the east of the Saltram makes a 'significant' contribution in terms of visual amenity

and that the benefits it provides in terms of visual amenity cannot be substituted (LUC, 2000,App.C).

### **Ecological Sensitivity of the area and potential impact on biodiversity at Saltram**

- 4.11 The open countryside to the east of Saltram has been designated a Site of Local Importance for Nature Conservation (PA, 2006;14). However detailed work is required to identify exactly what ecological functions, or potential functions, the site has (PA, 2006;14). A bat survey has already shown that there is a physical link between bat colonies at Sherford quarry and at Saltram.
- 4.12 What is clear is that when this area does become an annexed tract of countryside ecological pressure on habitats will grow, both to the west of Sherford and within Saltram itself. It is important that the land to the east of Saltram continues to afford the opportunities for developing biodiversity that will complement Saltrams existing special habitats (PA, 2006;14). The ecological implications of restricting the size of the green wedge yet still further with the expansion of Sherford, and how this will restrict the range of animals that forage over this area, has not been fully considered. The Parks Agency report highlights that if the viability of grazing is threatened at Saltram, as mentioned above, then this would also lead to a significant loss of biodiversity not least with an impact on the feed source for important bat colonies; and increased visitor numbers at Saltram could lead to losses to the parkland and tree habitat due to the required tree safety works (PA, 2006;28,31).

### **Role of the area as a productive landscape and as a recreational resource**

- 4.13 The NPAAP proposes a new countryside park in the North Plymstock area (Proposal NP11). The National Trust supports the principle of such a park as it could serve the role of a green wedge, which Saltram alone cannot fulfil, preserve a viable agricultural landscape, and provide the opportunity to relieve the recreational focus on Saltram when the local catchment becomes expanded with the development of Sherford and Plymstock Quarry.
- 4.14 The NPAAP does not give any indication of an intention to significantly change existing patterns of land use in the area proposed for the park and the Urban Fringe Study envisages that although the park will serve as a great recreational resource it will still function as a 'working landscape' (LDA,2006;35,36). The concern of the National Trust is that to propose and plan for future long term development west of Sherford significantly reduces the viability of the Countryside Park as a working landscape and a public amenity, and increases the recreational pressure on the registered landscape at Saltram, with the associated problems of management and conflicts with farming (PA,2006;23,27-33). The narrow area of land that is intended to be left between Saltram and the development area would in particular be of questionable viability as part of the Countryside Park as it would be difficult to achieve an appropriate form of management (PA, 2006;23,26,27).
- 4.15 The Parks Agency study (2006) makes clear that the land west of Vinery Land that is covered by Proposal NP16, is no different in visual, landscape, land use and amenity terms from land included within the Countryside Park proposal and that there is no reason why this area should not form part of the park (PA, 2006;25,26,33). To develop this land would harm the open character of the

area, limit the opportunity to integrate the green spaces in cohesive way, and restrict the function of the area as a green wedge.

### **Transport Links**

- 4.16 Part of the NPAAP justification for the development of the area west of Sherford in that it would allow transport links with the planned development at Plymstock Quarry (NPAAP 5.63), however, as discussed in the National Trust statement on *the setting of Saltram* this could have a harmful impact, not least on the setting of the listed Stag Lodge (PA,2006;20). 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 Urban Fringe study (LDA,2006;33).

### **5.0 Proposal NP01**

- 5.1 The National Trust statement on *the setting of Saltram* identifies that the most westerly field on the Plymstock Quarry north facing slopes is an integral part of the designed landscape at Saltram and within the 'essential setting'. The North Plymstock Area Action Plan's own character framework (p.16) also identifies this field as falling within the 'wider Saltram setting'. There are clearly competing alternatives for this land, which merits inclusion within the proposed countryside park, and yet it is unclear on what basis the decision to exclude it has been taken, and on that basis it fails the test of soundness (no.7).
- 5.2 The National Trust statement on *the setting of Saltram* also considers the issue of the sensitivity of the open land to the east of the quarry ('Colesdown hilltop'; character framework, p.16), which is identified for development, and the site allocations representation in relation to Wixenford Quarry.

### **6.0 How the plan can be made more sound:**

- 6.1 The housing proposal NP16 should be omitted. The plan should have adequate regard to the important contribution this area makes in providing a green wedge and consider clearly what the implications are of further development to the west of Sherford before bringing forward such a proposal. More consideration needs to be given in future reviews of the LDF to assessing the capacity of the area to accommodate growth and what the impacts would be on Saltram's historic landscape.
- 6.2 Proposal NP01 needs to have more regard to the impact on 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. The inclusion of Wixenford Quarry as a residential allocation would be unsound.

## References

- Baker Associates *et al* (Mar 2005) Plymouth SE Cornwall and SW Devon  
*Sustainable Growth Study*
- Land Use Consultants (Sept 2000), *Greenscape Assessment for the City of Plymouth*
- Land Use Consultants (June 2004), *Greenscape Strategy Update*
- LDA Design (Aug 2006), *Plymouth Eastern Corridor urban fringe study*
- South Hams (Nov 2006), *Sherford AAP Examination Topic Paper No1: Location*
- South Hams (Nov 2006), *Sherford AAP Examination Topic Paper No.2: Housing*
- SWRA (June 2006) *Draft Regional Spatial Strategy for the South West*
- SWRA (June 2006) *Strategic Sustainability Assessment of RSS*
- The Parks Agency (Dec 2006), *The Setting of Saltram Park (Part 1)*-Attached as Appendix1
- The Prince's Foundation (2004), *Sherford Enquiry By Design – Summary Report*



**NP 0373**

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

**DPD/ID number:** NP 0373

**The Test of Soundness:** Test 7

**Examination Issue:** Whether the AAP should contain more detail on the options for the location, timing and delivery of housing.