



National
Trust

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Your Ref:
Our Ref: MC/AW

19 March 2014

302./170

Ask.
Also
received
via
email.

Local Plan Review
Forward Planning
Mid Devon District Council
Phoenix House
Phoenix Lane
Tiverton
EX16 6PP



Dear Sir/ Madam

Local Plan Review

The National Trust wishes to comment on the site allocations for Tiverton given its ownership of Knightshayes Court, a cultural asset of national importance, including the grade I house and grade II* registered park and garden, which brings significant benefits to Tiverton in terms of its economic, social and recreational value, and as a quality of life resource.

Site Allocations: Tiverton

As part of an assessment of all sites in Tiverton it should be noted that **paragraph 5.6** of Local Plan Part 3 seeks to ensure that where development sites fall within the setting study area surrounding Knightshayes (*The Setting of Knightshayes Park and Garden: A Historic Landscape Assessment*; Sept 2007), the implications are considered at the design stage. This should be identified as a consideration on all sites within the study area.

Policy TIV10: Tidcombe Hill

This site that was considered by the Inspector examining the Allocations and Infrastructure DPD in 2010, who noted the possible impact on views from Knightshayes Historic Park, but felt that these could be accommodated in a detailed design. Paragraph 5.6 of Local Plan Part 3 seeks to ensure that where development sites fall within the setting study area surrounding Knightshayes the implications are considered at the design stage.

National Trust
South West Region
Killerton House, Broadclyst
Exeter, Devon EX5 3LE

President: HRH The Prince of Wales
Regional Chair: Clare Broom
Regional Director: Mark Harold

Registered office:
Heelis, Kemble Drive, Swindon, Wiltshire SN2 2NA
Registered charity number 205846

The English Heritage guidance in '*The Setting of Heritage Assets*' (2011) stresses the need to consider the effects on the significance of a heritage asset from a project's inception and that: 'Early assessment of setting may provide the basis for agreeing the scope and form of development, reducing the potential for disagreement and challenge later in the process' (page 20).

The Knightshayes setting study indicates that Tidcombe Hall is a notable feature in the *historic designed view* from the Church Path (view 5; '*The Setting of Knightshayes Park and Garden: A Historic Landscape Assessment*'; Sept 2007, p39). The proposed development of the site also has the potential to impact on a *historic view in* from Wamicombe Plantation, where there is a public footpath that gives a wide view of Knightshayes in its setting (view 10). Consideration should also be given to the impact on a view from the house itself (view 16; the house being listed grade I).

In accordance with the English Heritage guidance and local plan policy, consideration should be given to the effects on the significance of this heritage asset at the start of any assessment process. The need for a systematic assessment of the impact on the setting of Knightshayes, in line with Policy DM27, should be identified as an issue, with consideration being given to the options for avoiding or reducing any harm, and providing enhancement.

Policy TIV11: Wynnards Mead, Bakers Hill

As part of an assessment of this site in Tiverton it should be noted that paragraph 5.6 of Local Plan Part 3 seeks to ensure that, where development sites fall within the setting study area surrounding Knightshayes, the implications are considered at the design stage.

Policy TIV12: Land at Moorlands Park

As part of an assessment of this site in Tiverton it should be noted that paragraph 5.6 of Local Plan Part 3 seeks to ensure that, where development sites fall within the setting study area surrounding Knightshayes, the implications are considered at the design stage.

Policy TIV13: Exeter Hill

The north-east corner of this site that was considered by the Inspector examining the Allocations and Infrastructure DPD in 2010, when he stated that the main issue was: 'visual impact on views from Tiverton and beyond, including from Knightshayes Historic Park and Garden to the north west', and for even the modest extension proposed at that time, that it would be '**more obtrusive than other allocations**' (Inspectors Report; para 3.87). The Sustainability Assessment into the Allocations and Infrastructure DPD also acknowledged the: 'potential impact on views from Knightshayes Park'.

It is therefore surprising that for this much larger site in the Local Plan Review, under paragraph 3.30, it fails to make any reference to the visual impact issue highlighted by the Inspector in his report into the examination for the Allocations and Infrastructure DPD, or to

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the issue raised by paragraph 5.6 in Local Plan Part 3, namely consideration to the impact on the setting of Knightshayes.

An assessment is required of the likely impact of development on Exeter Hill on the approach to the house at Knightshayes from the west, which was a key element in the creation of the nineteenth century designed landscape, and was created to enjoy views southward across the park over Tiverton (*historic designed view*, number 4; *'The Setting of Knightshayes Park and Garden: A Historic Landscape Assessment'*; Sept 2007, p.23 and 39). Assessment is also required of the impact on the historic designed view out from Knightshayes Plantation (*historic designed view*, number 2).

In accordance with the English Heritage guidance *'The Setting of Heritage Asset'* (2011), and local plan policy, consideration should be given to the effects on the significance of this heritage asset at the start of any assessment process. The need for a systematic assessment of the impact on the setting of Knightshayes, in line with Policy DM27, should be identified as an issue, with consideration being given to the options for avoiding or reducing any harm, and providing enhancement.

Yours faithfully


Michael Calder MRTPI
Planning Adviser (South West Region)

Cont/d

Nick Cardnell

Subject: FW: Mid Devon Local Plan Review

From: Calder, Michael [<mailto:michael.calder@nationaltrust.org.uk>]

Sent: 20 March 2014 11:21

To: DPD

Subject: Mid Devon Local Plan Review

Dear Sir/ Madam

Local Plan Review

DM27 Development affecting heritage assets

In addition to the comments submitted on Tiverton below, yesterday. I also request that clarification is provided to the Trust on **paragraph 5.6 in Local Plan Part 3** as to the encouragement to applicants to check the website to see if their site falls within a setting study area. Following the Examination into LP3 It was understood that the Public Access system would show the setting study boundaries on a constraints map. This is not apparent when accessing the web-link given. Please can you clarify if this is being addressed.

Kind Regards

Michael

Michael Calder

Planning Adviser
National Trust
South West Region
Killerton House
Broadclyst, Exeter, EX5 3LE

07717 360659

From: Calder, Michael

Sent: 19 March 2014 11:33

To: 'planningconsultations@middevon.gov.uk'

Cc: Paterson, Lewis

Subject: Mid Devon Local Plan Review

Dear Sir/ Madam

Local Plan Review

Please find attached comments on Tiverton site allocations made on behalf of the National Trust.

Kind Regards

Michael

Michael Calder

Planning Adviser
National Trust
South West Region
Killerton House
Broadclyst, Exeter, EX5 3LE

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