

Planning, Design and Access Statement

To support a planning application for the surfacing of Middle Avenue and the realignment of a short section of Farm Walk at Dunham Massey Parkland.

1.0 Overview

This statement accompanies the planning application to the Trafford Council for the surfacing of Middle Avenue and the realignment of a short section of Farm Walk at the National Trust's Dunham Massey Estate. It should be read alongside:

- Annex A Historic Maps
- Annex B Parkland Management Plan Section
- Annex C Site Plans
- Annex D Location Plan
- Annex E HIA
- Annex F Ecology Survey Report
- Annex G Natural England Confirmation

In accordance with national validation requirements, the purpose of this statement is to outline the design principles and concepts that have been applied to the proposed development.

2.0 Proposed Development

2.1 Background

The National Trust is one of the country's largest conservation organisations, with a responsibility for managing and protecting some of the most beautiful, historically important, and environmentally sensitive places in England, Wales and Northern Ireland.

The Dunham Massey Estate was bequeathed to the National Trust in 1976 upon the death of Roger Grey, the 10th Earl of Stamford. At the heart of the Estate is Dunham Hall, a Georgian Mansion House and Grade I listed building. The designed landscape radiates out from the front of the house and features a patte d'oie, or "goose-foot" design which contains a series of avenues, all set within a medieval deer park and a Grade II* Registered Park and Garden. The wider estate contains 14 working farms and some 100 cottages let to private tenants.

The National Trust has a statutory obligation to protect its landholdings for the benefit of the nation and is therefore very aware of the need to carefully consider the potential impact of any new development.



2.2 Proposed development

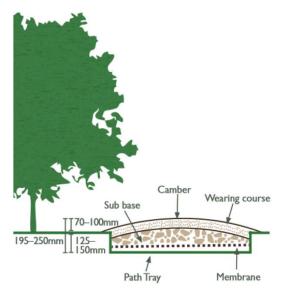
Middle Avenue is a historic grassed Avenue, which is part of the "goose-foot" design, and lies south east of Dunham Hall. It is a popular walking route for visitors to the park, especially those seeking a shorter walk and do not wish to complete the full Farm Walk to Charcoal Drive circuit. However, significant visitor usage over the years has resulted in erosion along the path and long sections becoming compacted, lumpy and boggy (Annex A – Historic Maps).

In 2018 Chris Burnett Associates prepared a Parkland Management Plan (or Conservation Management Plan) for the parkland which included the partial surfacing of Middle Avenue as one of its recommendations, along with the creation of a new pathway to link Farm Walk (Annex B – Parkland Management Plan - Section).

After reviewing the recommendations made in the Parkland Management Plan, it was considered that surfacing only part of the path could potentially create a strong desire line with more visitors potentially walking between Middle Avenue and Farm Walk. Accordingly, surfacing the full length of Middle Avenue (approx. 940m) is considered more beneficial in terms of visitor experience and accessibility, but also from a conservation point of view.

The proposed surfacing works would comprise of removing the grass/topsoil to a depth of 100mm and 2000mm wide. A path tray will be laid, along with a geo textile membrane in wet areas. A root protection system will be used in areas where there are nearby trees. The subbase will be gritstone with neutral or acidic pH. The path will be finished with compacted golden/buff aggregate, to match the already existing surfaced paths within the parkland. The camber/cross fall will be approx. 2% accords the width of the path (see figure 1).

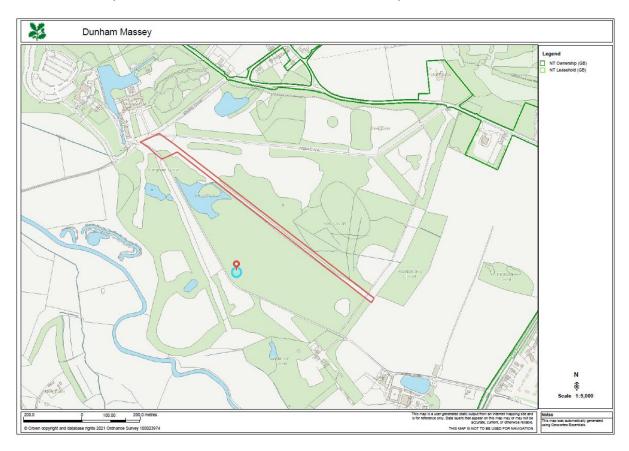
Figure 1



The current proposal also includes the realignment of a short section (approx. 75m) of Farm Walk to its historic axis, thus reinstating of the original radiant landscape design (the patte d'oie, or "goose-



foot"). Historic maps show initially all avenues and paths radiated out from a central point south of Dunham Hall with Farm Walk and Middle Avenue forming a 'D' shape (see appendix 1). It is understood a side branch to Farm Walk was laid out in the mid-1840's to connect it to the stable block, however a recent visit by Richard Wheeler, the National Trust's parks and garden historian, highlighted that this in effect interrupts a number of key views over the parkland and thus detracts from the historic landscape design. The proposal therefore seeks to reinstate the original radiant design and enable more visitors to enjoy the historic landscape, finishing their walk with one of the best views of the Hall from the estate (Annex C – Site Plans and Annex D Location Plan).



3.0 Planning Policy Considerations

In accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004, planning applications must be determined in accordance with the Statutory Development plan unless material considerations indicate otherwise.

The Statutory Development Plan for the application site consists of the Trafford Local Plan: Core Strategy (2012) and the Revised Unitary Development Plan (2006).

Material considerations include the National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG), together with any other supplementary planning.



The emerging replacement Trafford Local Plan was published for consultation in December 2020. It has therefore not yet reached a sufficiently advanced stage to carry weight in decision making.

The key elements of national and local planning policy relating to this proposal are set out below.

Trafford Local Plan: Core Strategy

Policy L7: Design – requires that all new development is appropriate in its context and makes best use of opportunities to improve the character and quality of an area.

Policy R1: Historic environment – sets out that all new development must take account of surrounding building styles, landscapes and historic distinctiveness. Developers are required to demonstrate how development will complement and enhance the existing features of historic significance including their wider settings, in particular in relation to conservation areas, listed buildings and other identified heritage assets.

Policy R2: Natural environment — ensures the protection and enhancement of the natural environment. It requires developers to demonstrate how their proposal will protect and enhance landscape character, biodiversity, geodiversity and conservation value of its assets. Designated sites such as Sites of Special Scientific Interest (SSSI's) and historic parks and gardens are recognised as part of the borough's assets.

Policy R3: Green infrastructure – seeks to develop an integrated network of high quality and multifunctional green infrastructure that will *inter alia*: contribute to the diversification of the local economy and tourist development through the enhancement and provision of new facilities; improve health and wellbeing; protect and connect existing and potential sites of nature conservation value and historic landscape features; and create appropriate access for a wide range of users to enjoy the countryside, including improved linkages to formal and informal recreation.

Policy R4: Green Belt, countryside and other protected open land – protects the Green Belt from inappropriate development. New development will only be permitted where it is for one of the appropriate purposes specified in national guidance, where the proposal does not prejudice the primary purposes of the Green Belt set out in national guidance by reason of its scale, siting, materials or design or where very special circumstances can be demonstrated in support of the proposal.

Policy R5: Open space, sport and recreation – seeks to protect and improve the quality of open space and outdoor sports facilities in the borough.

Policy R6: Culture and tourism – lists Dunham Massey Park and House as a key area where the Council will encourage and continue to support the culture and tourism offer, and related developments, that highlight and enhance the cultural heritage of the area.



Revised Unitary Development Plan

Most policies in the Revised UDP have now been superseded by policies in the Core Strategy. Only a small number remain of relevance.

Policy ENV17: Areas of Landscape Protection – within areas identified on the Proposals Map, the Council will protect, promote and enhance the distinctive landscape character and quality. In considering the suitability of proposals, regard will be had to the impact upon the landscape quality of the immediate area and the wider setting and on features of importance to wildlife.

National Planning Policy Framework

The National Planning Policy Framework (NPPF) was updated in July 2021.

It reaffirms the purpose of the planning system is to contribute to the achievement of sustainable development (para. 7).

Section 8: Promoting healthy and safe communities – recognises that access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well being of communities, and can deliver wider benefits for nature and support efforts to address climate change (para. 98).

Chapter 12: Achieving well-designed places – identifies that good design is a key aspect of sustainable development and creating better places in which to live and work (para. 126).

Chapter 13: Protecting Green Belt land – underlines the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence (para. 137).

Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances (para. 147). New buildings are considered inappropriate development except in a limited number of instances. Certain other forms of development are also not inappropriate in the Green Belt provided they preserve its openness and do not conflict with the purposes of including land within it. This includes engineering operations (para. 150).

Chapter 15: Conserving and enhancing the natural environment – requires that new development contributes to and enhances the natural and local environment by *inter alia* providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures (para. 174).

Chapter 16: Conserving and enhancing the historic environment – sets out that in determining applications, local planning authorities should require an applicant to describe the significance of any



heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance (para. 194).

In determining applications, local planning authorities should take account of: a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation; b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and c) the desirability of new development making a positive contribution to local character and distinctiveness (para, 197).

Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss (para. 201).

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, where appropriate, securing its optimum viable use (para. 202).

Planning Practice Guidance

Planning Practice Guidance was issued as a web-based resource in 2014 and provides further guidance on how the NPPF should be applied.

Relevant categories are summarised below:

Green Belt – when assessing the impact of a proposal on the openness of the Green belt, a judgement based on the circumstances of the case is required. It provides that openness is capable of having both visual and spatial aspects. Other relevant matters include the duration of the development and the degree of activity likely to be generated [Paragraph: 001 Reference ID: 64-001-20190722].

Historic Environment – defines 'significance' as the value of a heritage asset to this and future generations because of its heritage interest. Significance derives not only from a heritage asset's physical presence but also its setting. The NPPF definition further states that the planning context heritage interest may be archaeological, architectural, artistic or historic.

The NPPF requires any harm to designated heritage assets to be weighted against the public benefits of the proposal. Public benefits can be anything which delivers economic, social or environmental objectives as described in the NPPF.

Public benefits should flow from the proposed development. They should be of a nature or scale to be of benefit to the public at large and not just be a private benefit. However, benefits do not always



have to be visible or accessible to the public in order to be genuine public benefits. Examples include:

- sustaining or enhancing the significance of a heritage asset and the contribution of its setting;
- reducing or removing risks to a heritage asset;
- securing the optimum viable use of a heritage asset in support of its long term conservation [Paragraph: 020 Reference ID: 18a-020-20190723].

Natural Environment – information on biodiversity and geodiversity impacts and opportunities needs to inform all stages of development. An ecological survey will be necessary if the type and location of the development could have a significant impact on biodiversity and existing information is lacking or inadequate. Assessments should be proportionate to the nature and scale of development proposed and the likely impact on biodiversity [Paragraph: 018 Reference ID: 8-018-20190721].

4.0 Key Planning Issues

4.1 Appropriateness of development

The proposed site falls within an area designated Green Belt in the Trafford Core Strategy. Core Strategy Policy R4 and National Planning Policy Framework (NPPF) paragraphs 147 - 151 are therefore applicable. The work comprises a small scale engineering operation, which will have no net impact upon the openness of the Green Belt, and presents no conflict with the purposes of including land within it. As such, we consider that the work would qualify as 'not inappropriate' in the Green Belt (paragraph 150, criteria b) and is therefore acceptable in policy terms.

4.2 Historic environment

The historic drives were grassed routes extending out into the landscape. Due to footfall and annual rainfall significant erosion to the straight drives can be seen. Visitors, trying to find an easier route through the muddy path has created wide scars along the drive.

A HIA has been compiled, as part of this planning application, by Jamie Lund the National Trust's Archaeologist. The HIA states the surfacing of Middle Avenue is an appropriate intervention to stop the erosion of the historic drive and "improve the visual amenity, historic character and heritage value of the Main Drive over time by reducing the amount of bare or eroded ground as the introduction of a surfaced path would encourage visitors to stick to the path and would assist in the recovery of the ground on either side."

The HIA also states that the realignment of Farm Walk to its original axis would also benefit the historic environment of the parkland. A natural desire line along the original axis of Farm Walk is present. This



has been created by visitors walking along the original axis of the drive from the start of the "goose foot" onto the surfaced part of Farm Walk. This desire line has created erosion and is seen as a "muddy ribbon" for much of the year. The instatement of a surface path, along this desire line, and the original alignment of the drive will benefit the historic environment through a "gradual recovery and improvement of the visual amenity, historic character and heritage value of the Farm Walk by providing visitors with a surfaced path and encouraging its use, which will help to limit compaction and erosion of the ground on either side and over time assist in its long term recovery." (Annex E – HIA)

4.3 Biodiversity and Trees

The National Trust's ecologist has produced a survey on the current situation of the path and the surrounding vegetation and trees. The findings have shown a significant amount of erosion due to footfall, with exposure of tree roots and soil erosion. Therefore "without intervention this situation will inevitably worsen with likely negative impacts for tree health ultimately. This was an issue identified in the Parkland Management Plan, 2018, funded by Natural England through a Countryside Stewardship Scheme, and which highlighted the need for proper surfacing on the main routes."

A surfaced path would improve the biodiversity of the area and the erosion by reducing the footfall impaction "of the adjacent grassland, thus resulting in stronger vegetation growth, deeper herb/grass root penetration, improved rainfall absorption and recovery of finer tree roots. These aspects will collectively be ecologically beneficial in terms of the resilience and nature value of the sward but especially in protecting the future health of parkland trees for which the Dunham Park SSSI is most especially noted." (Annex F – Ecology Survey Report)

The National Trust has also had confirmation from Natural England's Lizzie Forrester (Advisor – Protected Sites & SSSI Casework) who has agreed that this work is in line with the Parkland Management Plan produced in 2018 (Annex G – Natural England Confirmation).

4.4 Public access and recreation

As already mentioned, Middle Avenue forms an attractive route for visitors to Dunham Massey parkland, who do not want to complete the full Farm Walk to Charcoal Drive circuit. As a straight path it is attractive to visitors who want to have a quick walk in the park before returning to the hall. The grassed desire line of the original axis of Farm Walk also provides visitors with a short route onto the already surfaced section of Farm Walk.

These grassed routes are well used by visitors but due to the footfall and wet conditions in the parkland for much of the year they are not easy to navigate. A surfaced path would improve this and allow for all visitors to enjoy this space without the need for 'all weather gear'. The introduction of a surfaced paths would facilitate pedestrian access all year round, and in all weathers. It would also transform the experience for families with pushchairs and wheelchair users, by creating a much more inclusive access opportunity and enable these groups to enjoy and experience the beautiful, historic and natural setting with ease.



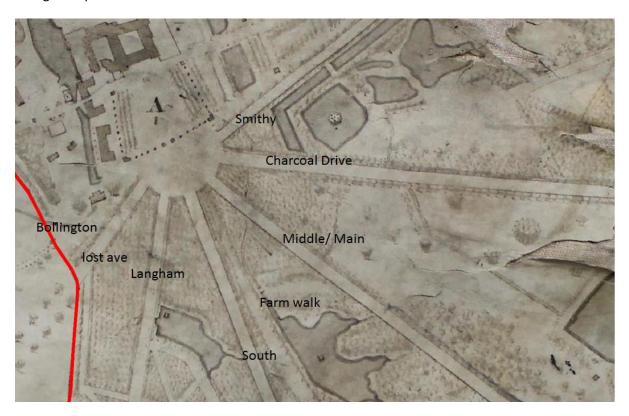
5.0 Conclusion

The proposed development satisfies both national and local planning policy and constitutes appropriate development in the Green Belt. The proposals complement the work the National Trust is doing to improve accessibility and reduce erosion on paths at the Dunham Massey Estate. It will also reinstate the original radiant design and provide visitors with an opportunity to experience the historic landscape.

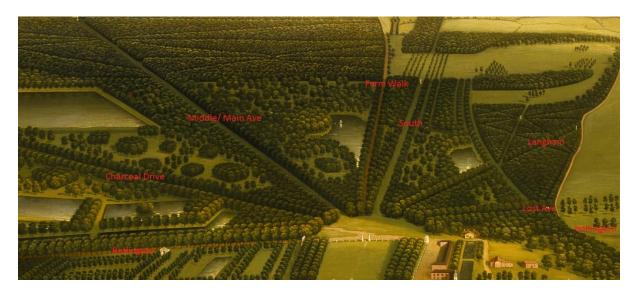


Annex A – Historic Maps

Stringer map 1753

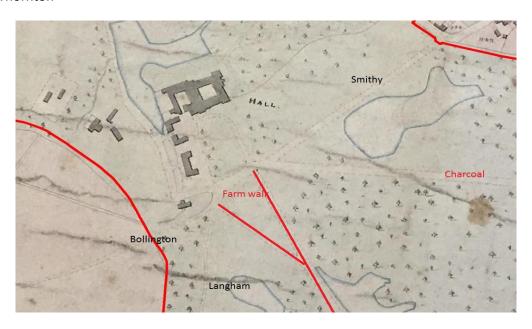


Harris views circa 1840

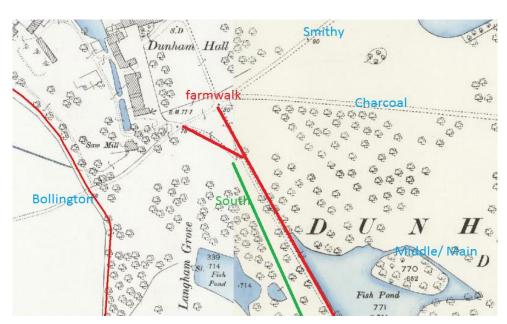




1848 Thornton



OS 1847





Annex B – Parkland Management Plan - Section

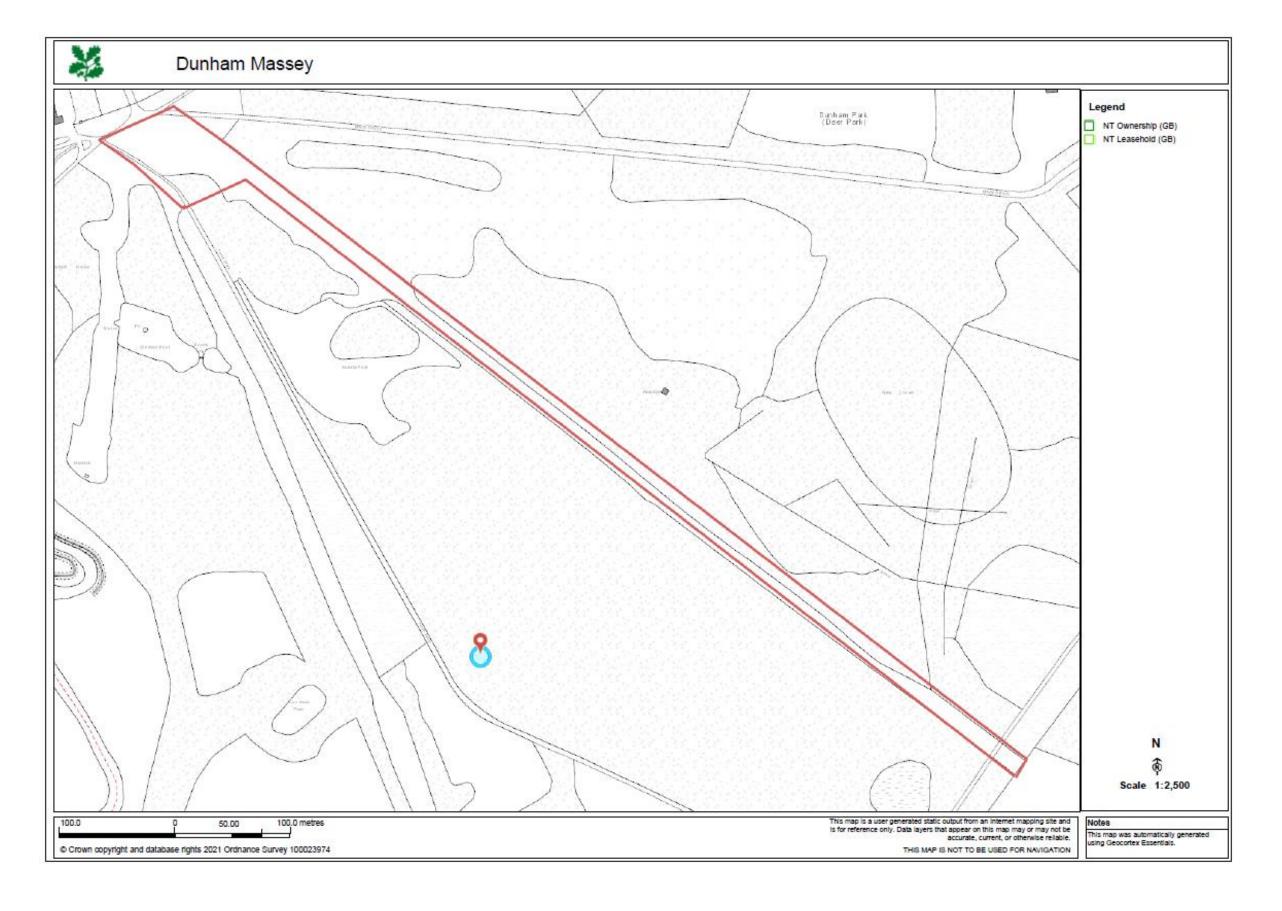
Access to the wider park is universal, apart from the restrictions imposed by the Deer Sanctuaries. (see Fig 1.4). However, although the main path routes are robustly surfaced, they are sometimes inadequate in terms of its surfacing and width and also in terms of meeting DDA criteria in places with poor drainage and resultant boggy sections a constant theme. Erosion on what were designed as grass sward avenues are now widespread and testament to the popularity of the park with visitors. Apart from looking unsightly this is damaging the historic fabric and limits accessibility for visitors especially in the winter months. A proper path network informed and guided by the evaluation of historic significance and associated restoration policy arising out of this PMP should be considered and established which meets the needs of all and allows the whole park to be fully explored, within the constraints of proper deer management.



Annex C – Site Plans

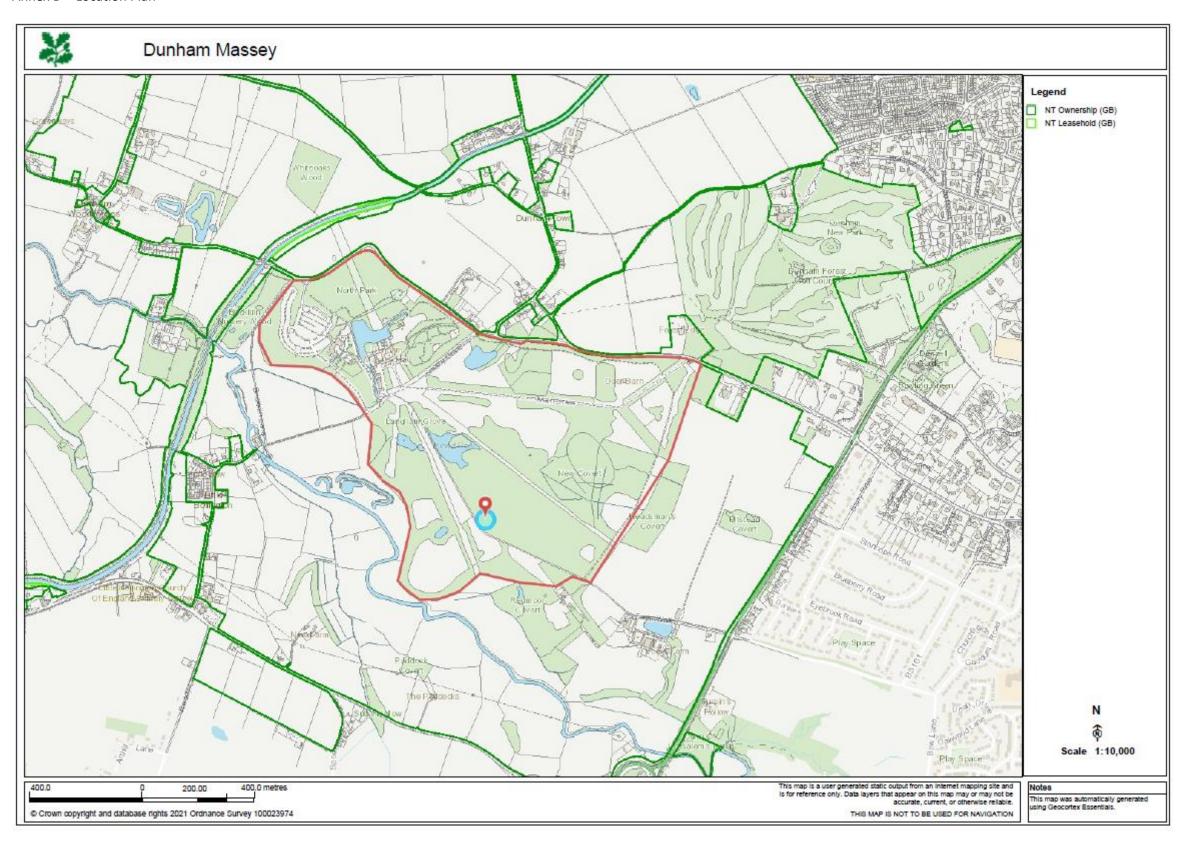








Annex D – Location Plan





Annex E – HIA – See Separate Document



Annex F - Ecology Survey Report

Ecological Survey & Assessment; Middle Avenue & Farm Walk, Dunham Park

Introduction

National Trust is proposing to upgrade the footpath along Middle Avenue which lies within Dunham Park SSSI. In addition, the northern end of Farm Walk is planned to be straightened to follow the original design line. To understand any ecological implications, the National Trust ecologist undertook a survey on 12th August 2021.

Biological Significance of Dunham Park

The primary interest feature of Dunham Park SSSI is stated to be its concentration of veteran tree, particularly oak and beech, together with the associated communities of dead wood invertebrate fauna. Alongside the veteran parkland trees and their fauna there is additional nature conservation significance in the unfertilised and `unimproved` acid grasslands, patches of dry heath, marshy grassland and various ponds found within the park walls.

Survey Findings

Middle Avenue is a designed parkland route which is now very well used by visitors and is consequently heavily trampled. It is lined either side by a double avenue of trees, mostly mature oak but with some veterans and other much younger replacements. Unsurprisingly, the line of the path is vegetated by a very short and often open sward of trampling resistant species including greater plantain, perennial rye-grass, prostrate knotweed, slender rush and dandelion. Along the centre line even the trampling adapted species are unable to survive the pressure and the sandy, erodable soil is becoming exposed. Away from the most intense trampling the adjacent sward is more intact and diverse with a mix of species characteristic of the light, acidic soil conditions such as common bent, meadow and creeping buttercup, tormentil, common cat's-ear, field speedwell and white clover. Here, along the edges of the avenue there is clearly less compaction and wear of the vegetation.

Tree roots are exposed in some areas of Middle Avenue, particularly the southern half. Fine roots and small roots have been physically damaged and will not be ecologically functioning. In places larger roots are also seen at the surface and are increasingly exposed and damaged. The process of root exposure appears to be continuing with a combination of trampling, vegetation loss and water erosion leading to the problem. At this moment any impact of root damage does not appear to be reflected in the health of the adjacent avenue trees, but that could change over time.

The tightly deer-grazed grassland across which the very north end of Farm Walk is proposed to be restored, comprises the same mix of trampling tolerant herbs and grasses forming a very short, species-poor turf.

Ecological Impact of Proposed Path Surfacing Work

Trampling and compaction, perhaps combined with shading from adjacent trees, has resulted in Middle Avenue not supporting a field layer vegetation of ecological distinction, unlike some other areas of Dunham Park. Along the line for the proposed path upgrading work the sward is severely degraded to the point where soil is eroding and tree roots exposed. Without intervention this situation will inevitably worsen with likely negative impacts for tree health ultimately. This was an issue identified in the Parkland Management Plan, 2018, funded by Natural England through a Countryside Stewardship Scheme, and which highlighted the need for proper surfacing on the main routes.

Provision of a suitable firm walking surface of limited width down the centre of the avenue will reduce trampling and compaction of the adjacent grassland, thus resulting in stronger vegetation growth, deeper herb/grass root penetration, improved rainfall absorption and recovery of finer tree roots. These aspects will collectively be ecologically beneficial in terms of the resilience and nature value of the sward but especially in protecting the future health of parkland trees for which the Dunham Park SSSI is most especially noted.

John Hooson

National Trust, Regional Nature Conservation Adviser



Annex G – Natural England Confirmation

From: Forrester, Lizzie < <u>Elizabeth.Forrester@naturalengland.org.uk</u>>

Sent: 28 August 2021 11:24

To: Hooson, John < John. Hooson@nationaltrust.org.uk >

Subject: RE: ADVICE 2021-08-11 361773 National Trust enquiry re. Dunham Park SSSI

Caution, this email originates outside of National Trust.

Dear Mr Hooson

My apologies for the delay in respond.

We are content with the proposals from a SSSI prescriptive and the proposal does not conflict with the Parkland Management Plan, when planning the drainage locations please take into consideration the effect this will have on the ponds and prevent impacts on water quality.

Regards

Lizzie Forrester

Adviser – Protected Sites & SSSI Casework
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