

Mr John Milne
Planning and Building Standards
Municipal Buildings
West Bridge Street
Falkirk
FK1 5RS

29 March 2021

Dear Mr Milne

P/21/0110/PPP | Erection of Visitor Centre to Include Information / Exhibition Space, Arts and Craft Workshop, Restrooms, Café and Retail Area and 82 Bungalows | Airth Mains Farm Cemetery Road Airth Falkirk FK2 8JG

The National Trust for Scotland wishes to **object** to the proposed development.

Grounds for objection

The proposed development will have a significant impact on a greenfield area, including a designated Historic Garden and Designed Landscape, along with nationally significant heritage assets. Despite these impacts, there is no Heritage Impact Assessment for the application that could assess and propose mitigations.

In particular:

Impact on Designed Landscapes

The proposal would have a direct impact on a significant proportion of a Designed Landscape at **Dunmore Park**, which is in the National Inventory of Historic Gardens and Designed Landscapes.

The Scottish Planning Policy states that:

“Gardens and Designed Landscapes

148. Planning authorities should protect and, where appropriate, seek to enhance gardens and designed landscapes included in the Inventory of Gardens and Designed Landscapes and designed landscapes of regional and local importance.” (Scottish Planning Policy, 2014, page 35)

FROM THE CHIEF EXECUTIVE

The National Trust for Scotland, Hermiston Quay, 5 Cultins Road, Edinburgh EH11 4DF
Tel: 0131 458 0200 Fax: 0131 458 0201 Email: information@nts.org.uk Web: nts.org.uk

The National Trust for Scotland for Places of Historic Interest or Natural Beauty is a charity registered in Scotland, Charity Number SC007410

Patron – HRH The Prince Charles, Duke of Rothesay KG KT GCB OM, Chairman – Sir Mark Jones, Chief Executive – Philip Long OBE FRSE

The application's *Landscape and Visual Assessment* document makes only a single reference to the Designed Landscape. The only mitigation proposed in this document is to screen the house sites with trees. The document makes no mention of how the proposed visitor centre and parking located within the Designed Landscape will affect that designated area, nor does it propose any mitigations for this much greater impact.

Impact on The Pineapple and Walled Garden, Grade A listed structures

The Pineapple and its associated Walled Garden are A-listed, designating a built heritage asset of national and international importance. Together they form a tranquil visitor experience combining elements of nature and human invention. As we understand them, the proposals would create a suburban approach to the site itself in the form of ribbon housing development, and close to the site, in close proximity to The Pineapple building itself, would insert a commercial building which has no aesthetic or functional relationship to The Pineapple or Walled Garden.

This would fundamentally alter the quality of place and the visitor experience, potentially diminishing the qualities that would attract visitors in the first place.

The Scottish Planning Policy states that:

"Listed Buildings

141. Where planning permission and listed building consent are sought for development to, or affecting, a listed building, special regard must be given to the importance of preserving and enhancing the building, its setting and any features of special architectural or historic interest. The layout, design, materials, scale, siting and use of any development which will affect a listed building or its setting should be appropriate to the character and appearance of the building and setting." (Scottish Planning Policy, 2014, page 34)

We consider that the proposed development would adversely affect the setting of The Pineapple and the Walled Garden.

Impact on the natural heritage

The Pineapple site hosts a healthy population of great crested newts, *Triturus cristatus*, which are a species protected by law. The proposed development makes no reference to this important ecological asset, and we are concerned that the conversion of open space to built development may have an adverse effect on this population and its ability to colonise other areas.

Incompatibility with Local Development Plan

The current *Local Development Plan 2 for Falkirk* (August 2020) has identified the proposed development area as a protected landscape (PE10 Inventory of Gardens and Designed Landscapes). The Local Development Plan has not zoned the area for housing or any other built development.

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The Local Development Plan policies on Historic Gardens and Designed Landscapes (page 33) states that:

“There will be a presumption against development which would adversely affect the character, condition, integrity or setting of sites identified in the ‘Inventory of Gardens and Designed Landscapes in Scotland’, as identified on the Proposals Map;” and

“Where development is within or adjacent to any historic garden or designed landscape, developers will be required to provide an assessment of the effects of their proposals on the character and setting of these sites and demonstrate how they will be protected and managed in conjunction with the development.”

The current proposal has not addressed how the development will affect the Designed Landscape, or how the site could be managed in conjunction with the development.

PE14 of the Local Plan also requires that “Development proposals in the countryside for uses not covered by policies for specific uses will only be permitted where: It can be demonstrated that they require a countryside location; They constitute infill development; or They utilise appropriate existing buildings.”

We do not consider these tests have been met.

We note that the Local Plan identifies housing sites within Airth (H48 and H50) which respect the settlement boundary and local road system, and do not impinge on the protected landscape.

Proposed visitor centre

The applicant states in their *Design and Access Statement* that “NTS welcome the development proposals and future partnership for use of the centre and facilities. A Visitor Centre is a much-needed facility which will benefit both visitors to the area and local community.” Also, in the *Supporting Planning Statement* that: “The National Trust for Scotland will partner the use and promotion of the Pineapple and wider interests through the Visitor Centre.”

The National Trust for Scotland has not welcomed the proposed development, committed to a partnership, or identified the proposed visitor centre as of benefit to The Pineapple.

We are aware that there was contact around July 2019 between the applicant and former Trust representatives in relation to an earlier, smaller proposal, that also included a proposed visitor centre.

At that time, we advised the applicant that the Trust had a responsibility for the protection of rare species at the site, including the great crested newt, and would not support any application that did not demonstrate how this ecologically important site would be protected.

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The applicant's *Preliminary Ecological Appraisal* makes no mention of the presence of great crested newts at The Pineapple site and does not address how this development could be compatible with the natural heritage.

We also advised the applicant that the then (2019) proposals referred to a Visitor Centre for the Dunmore Pineapple but had no explanation as to how the Visitor Centre would benefit The Pineapple in terms of access, visitation, knowledge, support or use. We asked at that time that the centre **not** be referred to as a Visitor Centre for The Dunmore Pineapple, until we could determine what, if any, benefit was intended.

There has been no subsequent contact with the developer, and the current application makes no reference to how the Visitor Centre would relate to the work of the Trust in conserving and interpreting The Pineapple. Typically, visitor centres are directly associated with the heritage asset, and there is direct benefit in terms of supporting the conservation effort.

To propose a Visitor Centre for another's owner's asset – without regard to their own plans – is an unusual step to take.

Curiously, the applicant's *Pre-Application Consultation Report* states that in relation to "Impact on the Pineapple Heritage Resource" that:
"Have the owners of the Dunmore Pineapple been involved in the Visitor Centre project.

A number of discussions have taken place with Historic Environment Scotland (HSE) regarding their use of and participation in the Visitor Centre and support services. As requested, we have agreed to continue to work with HSE as we move to full development details regarding the setting up and use of the Visitor Centre in relation to floor presence, display and exhibition materials.

Historic Environment Scotland (HES) are not the owners of The Pineapple, and beyond their role in listing, have no involvement with the property.

National Trust for Scotland plans for The Pineapple

The Pineapple and Walled Garden are a core heritage asset for the National Trust for Scotland, having being acquired in 1973, and declared inalienable in 1974, reflecting the property's significance.

The Trust is currently developing a new 10-year strategy which will cover access, inclusion, visitor experience and conservation at our properties.

It is therefore premature to propose a Visitor Centre intended to serve this site in some form, given we as owners will be making our own plans which will inevitably supersede those of the applicant.

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Conclusion

In conclusion, we object to the proposed development due to the adverse impact on the natural and cultural heritage of The Pineapple site and the associated Designed Landscape; its incompatibility with the Local Development Plan, and its policies to protect Historic Gardens and Designed Landscapes, and open countryside; and the disjointed proposals for a Visitor Centre with no relationship to the Trust's management of The Pineapple.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Philip Long', with a stylized flourish at the end.

Philip Long

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