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May 28th 2026

To Whom It May Concern,

26/0619/OUT

**Outline application for residential development (up to 8 dwellings) with associated roads and landscaping. All matters reserved with the exception of the proposed vehicular access point onto Hulham Road
Land West Of Hulham Road Exmouth**

The Gardens Trust (TGT) have been alerted this week to the above application by the Devon Gardens Trust. The application potentially affects the historic designed landscape at A la Ronde and The Point in View, a Grade II registered park and garden (RPG) included by Historic England on the Register of Parks and Gardens of Special Historic Interest. The inclusion of the site on this statutory register requires great weight to be given to its conservation.

I have to begin this letter by reminding the LPA that the Gardens Trust is the Statutory Consultee on development affecting all sites included on the Historic England *Register of Parks and Gardens of Special Historic Interest*. As stated above, we were alerted to this application on Wednesday 27th May by the Devon Gardens Trust (members of TGT and their voluntary planning advisors provide local information to TGT).

However, to date, TGT has not been formally consulted by your authority. We would respectfully remind you of the judgment handed down in the case of SPAB v Broxtowe Borough Council (2023) which makes it unambiguously clear that any consent granted without the benefit of proper consultation will be invalid.

Nonetheless, due to the recommendations offered by the Devon Gardens Trust, we wish to echo their robust comments as follows;

The Grade II RPG describes the site as follows "Developed in the late C18 and early C19 with further alterations in the late C19, A La Ronde and the associated grounds of the chapel, Manse and almshouses known as The Point in View, form a Regency ferme ornée. Ornamental landscape features are combined with more practical paddocks, orchards and kitchen gardens creating an ornamented estate."

The RPG description flushes out the significance of the site by identifying the historic interest, design interest and group value as follows:

Historic Interest

- * as a landscape laid out at the turn of the C19 which survives sufficiently well to reflect the original design;
- * as a rare example of a small-scale picturesque ferme ornée, comprising ornamental landscape features combined with more practical paddocks, orchards and kitchen gardens, creating an ornamented estate;
- * laid out by the well-travelled and cultured Parminters, and, along with the buildings, reflecting Regency tastes and fashions, along with the ladies' spiritual values.

Design interest

- * a carefully composed, picturesque landscape around A la Ronde, where the ha-ha separates the house platform and former poultry yard from the pastures and dramatic estuarine view below, designed with a circuit walk and ornamental features, with the more practical farmland around Point in View, characterised by its rural isolation;
- * well-documented, enabling the general development to be understood, and providing an insight into the tastes and values of the creators.

Group value:

- * with the Parminter's house, A la Ronde, and their chapel, The Point in View, and the Manse, all Grade I-listed structures.

The fact that these different values are identified and explained in detail demonstrates the overall high significance of the entire site and its setting. This designed landscape is characterised by extensive views to the south and west across the River Exe and its estuary, and, less obvious but as vital aesthetic counter-point, views of the skyline to the north and east of the chapel and Manse.

We have reviewed the documents relating to this application on your website, and particularly to the Heritage Statement (Avalon Planning, January 2026) and concur with the Devon Gardens Trust to state the following;-.

We note with concern that this is an outline application, effectively seeking to establish the acceptability in principle of development in this location. We consider such an approach to be inappropriate where development has the potential to affect the setting of two Grade I Listed buildings (The Point in View and The Manse), and the setting of the Grade II registered landscape associated with A la Ronde and The Point in View; the two Grade I structures are integral to the early nineteenth century

designed landscape that has been judged to be of national significance. Once the principle of development on this site has been conceded, the applicant will be free to submit fresh plans, the impact of which cannot be assessed from the submitted documents.

It should be noted that Grade I heritage assets are of exceptional interest in the national context, and comprise only some 2.5% of all Listed structures. Proposed change affecting the setting of such buildings should preserve or enhance the significance of the heritage asset.

We are grateful to the Devon Gardens Trust for visiting the site to assess the impact of development in the area proposed. They noted that the proposed development site is screened from the immediate setting of the Grade I Listed heritage assets by hedgerows and trees; a fact highlighted by the Heritage Statement. However, the Heritage Statement does not consider the degree to which the present situation reflects historic precedent: historic images, including a mid-nineteenth century engraving of The Point in View and The Manse, all show standard trees growing out of significantly lower hedgerows to the east and north-east of the heritage assets; this management was clearly intended to allow views out from the historic designed landscape to the east and north so that, from within the landscape, an uncluttered skyline would be visible through the trunks of the standard trees. Development in the proposed location will permanently preclude the reinstatement of the historic landscape aesthetic by reason of the necessary retention of inappropriately tall hedges and un-managed standard trees as screening for the development. Further "mitigation" planting to the north and west of the proposed development site would merely exacerbate this problem, change the landscape setting yet further, and is clearly inappropriate.

From their examination of the site the Devon Gardens Trust conclude that, despite the slight drop in level towards the proposed development site and the presence of the trees and hedges which have not been managed in accordance with the historic landscape aesthetic, at least the roofs of the proposed development (assuming the properties to be of two storeys) will be visible from within the nationally designated designed landscape and the immediate setting of the Grade I Listed structures. Light from windows, especially in winter, noise from domestic activity will have a further adverse impact on the setting of both the Grade I Listed structures and the Grade II historic designed landscape.

While, as set out in the Heritage Statement, it can be argued that the immediate impact of the proposed development on A la Ronde itself would be limited by reason of distance and topography, we consider that the unique significance of the Grade II historic designed landscape lies in the way in which each element was integrated into an overall scheme; therefore it is clear that harm to any one or more of the constituent elements comprising that designed landscape (in this case The Point in View and The Manse) or its setting would adversely impact on the significance of the heritage asset as a whole. This point is not explored or acknowledged in the Heritage Statement, and constitutes a serious omission in the evidence provided to your Authority.

For the reasons set out above, the Gardens Trust concur with the Devon Gardens Trust to conclude that, while the harm caused by the proposed development to the

two Grade I Listed structures and the overarching Grade II historic designed landscape, can be described as being “less than substantial”, we submit that in our professional opinion that harm lies at **the upper end of “less than substantial” harm.**

Yours faithfully

Joanne Mirzoeff BA (Hons) MSc
Consultant Conservation Officer