

Planning Department
South Hams District Council
Follaton House
Plymouth Road
Totnes TG9 5NE

Your ref: 49/0853/14/F
Our ref : E14/0062

1 May 2014

Dear Sirs

Erection of a single wind turbine (estimated output of 500kw) with a 50m hub height, 77m tip height with associated infrastructure and formation of access track, SX 5332 5789, Boringdon Park, Plympton, Plymouth

Thank you for consulting the Devon Gardens Trust on the above application which affects Saltram Park, an historic designed landscape of national importance, which is included by English Heritage on the Register of Parks and Gardens of Special Historic Interest at Grade II*.

The Devon Gardens Trust works in partnership with The Garden History Society in responding to consultations to ensure that your Council as the local planning authority receives authoritative specialist advice on planning and conservation matters regarding applications affecting historic parks and gardens and their setting.

The Devon Gardens Trust, formed in 1987, is one of the earliest county gardens trusts to have been established and has considerable knowledge, expertise and experience of developments affecting historic designed landscapes. One of its roles is to help safeguard the heritage of historic landscapes within the County of Devon by advising local planning authorities on statutory and non-statutory parks, gardens and designed landscapes of importance.

We have visited Saltram and the the Boringdon Arch. We have viewed the English Heritage Register map and entry, and the planning application documents on your web site. We would ask you consider the following comments:

The National Planning Policy Framework states a presumption in favour of sustainable development in both plan making and decision making, but recognises that there is a need to balance any adverse impacts against the benefits. The NPPF sets out 12 core planning principles that should underpin both plan making and decision making.

Principle 10 states that planning should “conserve heritage assets in a manner appropriate to their significance so that they can be enjoyed for their contribution to the quality of life of this and future generations.”

NPPF para 126 states that “heritage assets are an irreplaceable resource...and conserve them in a manner appropriate to their significance.” It reiterates the previous advice of PPS5 that LPAs, in determining applications, should require the applicant to describe the significance of any heritage assets affected, including any contribution made by their setting.

Saltram is an C18 garden and parkland landscape developed from the mid C18, with advice on garden structures from Lord Grantham, and from c 1770 with advice from the landscape designer Nathaniel Richmond. In 1754 Richmond began working for Lancelot 'Capability' Brown and later had his own commissions. Boringdon Hall is a designed landscape of special interest in the context of Devon and, as such, is on the Devon Gazetteer of Parks and Gardens of Local Interest. Boringdon Arch was constructed as an eye-catcher from the parkland of Saltram and is an essential part of the wider historic designed landscape of Saltram House.

The English Heritage Register description for Saltram House stresses the importance of the Boringdon Arch in relation to Saltram: *A further important vista was created from Saltram house to the Arch at Boringdon in 1783. The Arch (not included in the registered area but listed grade II* and part of Scheduled Monument 33780), stands c 2km north-north-east of the house, and was built for Lord Boringdon to a design by Robert Adam (1728-92). It served as an eye-catcher from Saltram House and provided a sudden and dramatic view of Saltram when approached from the north via the former drive that led from Boringdon House. The Arch is constructed in brick, stone and stucco, flanked by paired pilasters, it has single storey screen walls to each side and a single storey lodge (now ruinous) attached to the rear. The Arch stands within a plantation laid out in the late-C18 and retains several mature trees.*

The description goes on to state: *The eastern part of the park is occupied by parkland north and west of the former kitchen garden and by Hardwick Wood, now separated from the main body of the park by the A38 road. The wood occupies a high ridge of ground and contains the remnants of a series of ornamental walks (as first shown on the OS drawing of 1785), which were laid out by Lord Boringdon, probably as part of the landscape improvements of c 1770 with advice from Nathaniel Richmond. In c 1800 the first Earl of Morley created a new entrance drive now surviving as a track (see above). The walks and drive offer a series of extensive views northwards to the Triumphal Arch and beyond to Dartmoor, and, in the late-C18 and early-C19 westwards to Saltram, as depicted in a view of 1797 painted by the Revd John Swete.*

The proposal is to erect a single wind turbine with a 50m hub height and 77m tip height with associated infrastructure on the golf course to the north of Boringdon Hall. The proposed wind turbine would be slightly below the ridge and a little to the east of the Boringdon Arch.

The supporting documentation acknowledges the potential impact on Saltram, but discounts the impact on both Saltram House (Listed Grade I) and the Registered Park and Garden (Grade II*) because vegetation disrupts the designed views from the house. Whilst this may be the case in the summer months it certainly would not be when the trees lose their leaves. The application documents are misleading in the assertion that the designed landscape at Saltram addresses the house and estuary. This is a fundamental misreading of the aesthetic design. The Boringdon Arch was the focal point of the overall landscape design, linking the new seat at Saltram with the ancestral seat of the Parkers at Boringdon and framing spectacular views across the new landscape. We consider that the proposed wind turbine, by reason of its height and siting, would be an unacceptable visual competitor to the Boringdon Arch in its role as eye-catcher from Saltram.

Whilst the The Garden History Society and the Devon Gardens Trust support the principle of renewable energy, we have to consider the impact of such development on historic landscapes. In our opinion, the siting of wind turbines near historic landscapes should, wherever possible, be avoided because of the effect on the character and appearance of these extremely important heritage assets. The Devon Gardens Trust, together with The Garden History Society, advise that development which adversely impacts upon the historic environment should not be permitted.

In conclusion, we are concerned about the adverse visual impact of the proposed wind turbine on the setting of the park and the listed buildings of Saltram House and the Boringdon Arch. We recommend that your authority should refuse consent for this proposal as it clearly conflicts with national planning policy with regard to the conservation of the historic environment.

Yours faithfully
John Clark
Conservation Officer