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Plymouth City Council
Development Management
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Department of Development
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FAO Alan Hartridge
Your ref: 14/02401/OUT

9 November 2015

Dear Sirs

Proposed residential development of up to 280 dwellings, Land off Plymbridge Road, Boringdon, Plymouth

Thank you for consulting The Gardens Trust on the above application which affects Saltram Park, an historic designed landscape of exceptional importance, the Boringdon Arch, and Boringdon Hall set in a historic designed landscape of local historic interest, and the Boringdon Deer Park.

The Gardens Trust, formerly The Garden History Society, is the Statutory Consultee on development affecting all sites on the Historic England *Register of Parks and Gardens of Special Historic Interest*. The Devon Gardens Trust is a member of The Gardens Trust and responds to consultations in the County of Devon to ensure that your Council receives authoritative specialist advice on planning applications affecting historic parks and gardens and their setting.

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

The planning application is for the proposed residential development of up to 280 dwellings, on the hillside off Plymbridge Road, south of Boringdon House.

Boringdon was the large and imposing seat of the Parker family from the late C16 until the late C18 when they moved to Saltram. The Grade I listed mansion is in a fine situation within an Area of Great Landscape Value, and commands very extensive and beautiful views. The Boringdon Deer Park, enclosed by Royal licence granted in 1699 is a Scheduled Ancient Monument. Both the Boringdon Arch and the Boringdon Deer Park are on the Historic England Heritage at Risk Register.

Saltram is an C18 garden and parkland landscape of **exceptional** importance, which is included by Historic England on the *Register of Parks and Gardens of Special Historic Interest* at Grade II*. It was 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 and is regarded as one of the important C18 designers of the English Landscape style.

Boringdon Hall is a designed landscape of importance in the local context of Devon and, as such, is on the Devon Gazetteer of *Parks and Gardens of Local Historic Interest*. Within the scheduled Boringdon Deer Park lies the Boringdon Arch standing prominently on the distant hillside, framed by woodland. The Arch, listed Grade II*, was designed to act as an eye-catcher from the parkland of Saltram. The Boringdon Arch is an essential part of the wider historic designed landscape of Saltram.

The 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 role, and significance, of the Boringdon Arch to Saltram has subsequently been confirmed in the appeal decision of 29 June 2015 for the proposed wind turbine at Boringdon Golf Club (APP/K1128/A/14/2229204). In relation to the Boringdon Arch, the Inspector stated:

"The significance of this asset is primarily derived from its design as an eye-catcher to be seen from Saltram House, as well as a focal-point when viewed from a number of locations around the designed landscape to the house, including the Grade II listed mid18th century Amphitheatre."*

The Historic Environment Assessment, which forms part of the planning application, is therefore both inaccurate and misleading in the assertion *"that there are no longer any views from Saltram House or its environs towards the triumphal arch, and therefore the anticipated intrusion of the proposed development within its designed view does not remain a consideration."* (para 8.9)

We would advise that this document should be disregarded by the local planning authority in assessing this application, as it clearly demonstrates a fundamental misunderstanding of the aesthetic design of Saltram. The Boringdon Arch was the focal point of the overall landscape design, linking the new seat of the Parkers at Saltram with their ancestral seat at Boringdon, and framing spectacular views across the new landscape.

The Boringdon Arch is only some 290 metres to the north west of the application site. The replacement of open countryside by the proposed suburban housing estate of up to 280 dwellings would intrude into the designed views from Saltram, seriously detracting from the rural setting of the Boringdon Arch. There is no doubt that the proposed development would challenge the visual dominance of the Boringdon Arch in its open setting, part countryside and part golf course, and would form an unacceptable element in the designed views of the Boringdon Arch in its role as eye-catcher from Saltram. The housing estate would also replace the rural setting of Boringdon House, thereby causing harm to the significance of the heritage asset.

The NPPF 132 states that the more important the heritage asset the greater the weight that should be given to their conservation. The proposed residential development would adversely affect heritage assets of the highest significance, namely Boringdon House, listed Grade I, the Boringdon Arch, listed Grade II*, the scheduled Boringdon Deer Park, and the Grade II* Registered designed landscape at Saltram. The NPPF defines 'conservation' as the process of managing change to a heritage asset in a way that sustains and where appropriate enhances its significance. The proposed development would considerably harm the significance of these high graded heritage assets and therefore should not be permitted.

In conclusion, we are concerned about the adverse visual impact of the proposed residential development on these heritage assets. We recommend that your authority should refuse permission for this proposed development as it clearly conflicts with national planning policy with regard to the conservation of the historic environment.

Yours faithfully
John Clark
Conservation Officer