



Devon Gardens Trust
Exeter Community Centre
17 St David's Hill
Exeter
Devon
EX4 3RG
www.devongardenstrust.org.uk
conservation@devongardenstrust.org.uk

Planning Services
East Devon District Council
Blackdown House
Border Road
Heathpark Industrial Estate
Honiton
EX14 1EJ
By email: planningcentral@eastdevon.gov.uk

25th May 2026

Dear Sir

Application No: 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

Thank you for consulting Devon Gardens Trust on the above application which affect the historic designed landscape at A la Ronde and The Point in View. This landscape has been identified by Historic England as being of national significance, and is included on the *Register of Parks and Gardens of Special Historic Interest* at Grade II. It comprises a unique early nineteenth century ensemble of *cottage ornee* and associated pleasure grounds, and a *ferme ornee* landscape incorporating a non-conformist chapel with integral almshouses, and a manse for the accommodation of the minister. 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.

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*. Devon Gardens Trust is a member of The Gardens Trust and will provide advice on its response. We understand that to date your Authority has not consulted the Gardens Trust on this application; 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.

We have given careful consideration to the documents relating to this application on your website, and particularly to the Heritage Statement prepared by Avalon Planning in January 2026.

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.

In addition to considering the submitted documentation, we have visited the site to assess the impact of development in the area proposed. We 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 and is clearly inappropriate.

From our examination of the site we 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, Devon Gardens Trust concludes 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

Jonathan Lovie

Conservation Officer
Devon Gardens Trust