



70 Cowcross Street
London EC1M 6EJ
Telephone: (+44/0) 207 608 2409
Email: enquiries@thegardenstrust.org
www.thegardenstrust.org

Plymouth City Council
Ballard House
26 West Hoe Road
Plymouth PL1 3BJ
By email only
planningconsents@plymouth.gov.uk

February 18th 2026

Dear Emily Godwin,

25/01657/MOR

Pre-application for the installation options for a heat recovery unit, window replacement and the installation of high level guarding to allow safe access to the roof

The Laboratory, Hoe Road Plymouth PL1 2PB

Thank you for consulting the Gardens Trust in its role as Statutory Consultee on the above application which may have a material impact on the significance of The Hoe, a Grade II registered park and garden (RPG) included by Historic England on the Register of Parks and Gardens of Special Historic Interest. We have liaised with our colleagues in the Devon Gardens Trust and their local knowledge informs this joint response.

Thank you also for alerting us to the Design and Access Statement – our comments below are in response to this update.

The Hoe comprises a public walk and parade ground of mediaeval origin, developed in the nineteenth and twentieth centuries as a public park as well as a setting for several public monuments. The application is for works to the nearby building known as The Laboratory.

We have reviewed the application documents and note the following:

1. Location of new heat rejection unit. Of the two options, we prefer Option 1 positioned at the rear of East Wing because it is at ground level. Option 2 on the roof of North Building would only be suitable if it were positioned below the parapet where it would not be visible - the document only states that it would 'not exceed the height of the ridge to the South Building minimising the impact on any views from the bastion walls behind' but does not mention its height relative to other buildings or views from other directions. If Option 2 is genuinely not visible from views to the building, then either position is acceptable.
2. On the fenestration, in principle we welcome the intention to have consistency across the site and to improve thermal efficiency. However, the buildings date

from different periods, the South Building and Library being the most relevant in terms of impact on the RPG. The library is a more contemporary structure so it is the South Building that is visible from much of The Hoe and from the part of the RPG that runs along in front of the building. Current fenestration of the South Building is timber sash and casement windows which appear to be painted cream. Therefore, we would support Option 3 which would allow for direct replacement of the windows like-for-like. We also express a preference for the timber frames to be painted cream which is less harsh in long views unless there is evidence that demonstrates that the windows were, originally, painted white.

3. The Guard Rail. We acknowledge that is likely to be essential from an Health and Safety perspective. It would be preferable to be in a matt finish to prevent reflection and to ensure it is not visible in long views.

We would be grateful if the LPA and/or the applicant could notify us if revised proposals are submitted and we would also be grateful to be advised of the outcome of the application in due course.

Yours sincerely

Joanne Mirzoeff BA (Hons) MSc
Consultant Conservation Officer