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By email only; [planningconsents@plymouth.gov.uk](mailto:planningconsents@plymouth.gov.uk)

July 8th 2026

Dear Mrs Warne,

**26/00878/MJR**  
**Pre-application for change of use from retail (Class E9(a)) to offices (Class E(g)(i)) with associated replacement/extension of upper storeys**  
**40 - 46 Royal Parade Plymouth PL1 1DU**

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 Civic Square, Plymouth, 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 this site on this statutory register requires great weight to be given to its conservation. We have liaised with our colleagues in the Devon Gardens Trust and their local knowledge informs this joint response.

The RPG is a public square of 1957-62 designed by Geoffrey Jellicoe and established as part of the civic layout of Plymouth planned in 1956 by the city architect H J W Stirling and based on Patrick Abercrombie and J Paton Watson's post-war plan for Plymouth of 1943.

We have reviewed this application and note that the proposals are for change of use and involve some degree of restoration to the proposed 'Capability Centre' and the extension of the upper storeys of the building. We welcome the proposed repair and restoration of the historic features of the structure.

However, whilst we have no objection in principle to the removal of the 1989 extension to the top floor of the building, we wish to express concern that the envelope of the proposed new extension pushes out almost to the building line of the original structure.

The 1989 extension was recessed which articulates the original building from the later extension, particularly in views from the Civic Centre. The proposed new design introduces a far more of a solid block than the 1989 extension.

We do not know whether the original design intention of the recessed 'tower' element was to echo the (Italianate) tower on the Guildhall or not, but it is interesting that the Pearl Assurance building also has a tower element. This does not seem coincidental.

These proposals which, effectively almost encase this aspect of the building destroys that tower effect and creates a totally different skyline. No dimensions are given but it may also impact on the monumental effect of the Civic Centre.

We would therefore strongly recommend that the new extension incorporates some distinct form of recess or set-back to minimise the scale and the massing of the proposed new extension, to continue to allow the articulation of the original structure from the new and to continue this apparent design approach.

We acknowledge that this is pre-application and we would hope to see a Heritage Statement and an Historic Impact Assessment including views compared with other buildings, including the Civic Centre, in the vicinity as part of any future formal application and to allow for an adequate assessment of the proposal's impact on the significance of the Registered Park and Garden as per the requirements of paragraph 207 of the NPPF.

Yours sincerely

Joanne Mirzoeff BA (Hons) MSc  
Consultant Conservation Officer