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May 27th 2026

To Cllr Law and Ross Wise,

P/2026/0283 and P/2026/0284

**Temporary installation to provide viewing gallery and building visiting area internally to building. Externally, the siting of three temporary buildings to provide accommodation and sanitary facilities.
The Pavilion Vaughan Road Torquay TQ2 5EQ**

Further to our letter dated May 21st (regarding the lbc), can we thank you again for consulting the Gardens Trust in its role as Statutory Consultee on the above planning application which may have a material impact on the significance of Princess Gardens and Royal Terrace Gardens, 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 the Devon Gardens Trust and their local knowledge informs this joint response. Neither the Gardens Trust nor the Devon Gardens Trust are able to make a site visit at this time.

The RPG listing describes the site as 'A group of late C19 seafront public gardens and picturesque terraced cliff walks' and the application site is specifically mentioned in the listing 'In 1909 plans by Garrett for a new pavilion on a site at the eastern end of the Princess Gardens were approved, and the structure was completed in 1911'

We have reviewed the proposals accompanying the planning and listed building applications and note that the Heritage Impact Assessment (Poynton Bradbury, April 2026) fails to mention the RPG whatsoever. Therefore, the information provided is insufficient to allow an adequate assessment of the proposal's impact on the significance of the RPG, and does not meet the requirements of paragraph 207 of the NPPF to describe the significance of any heritage assets affected to a level of detail proportionate to their importance.

Historic England's The Setting of Heritage Assets, Historic Environment Good Practice Advice in Planning Note 3 (Second Edition) is particularly useful guidance that addresses this issue, especially the paragraphs that address historic parks and gardens.

We would urge the LPA to request that further information is provided so that a full assessment of the impact on the RPG can be understood. We would be very happy to review further information once it has been submitted and, in the meantime, we will wait to hear from you.

Yours faithfully

Joanne Mirzoeff BA (Hons) MSc
Consultant Conservation Officer