



New Life for
Remarkable Buildings

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By email to: Correspondence.Jack.Sargeant@gov.wales &
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Our reference: 250227

29.08.25

Dear Mr Sargeant,

**Additional evidence to support request for call-in | Listed Building Consent
C25/0403/09/CR | Phased partial deconstruction and demolition of the building, and
required support works to stabilise remaining structure | Corbett Arms Hotel, Corbett
Square, Tywyn, Gwynedd, LL36 9DG**

Further to our previous letter of 23rd July 2025 requesting the call-in of the above Listed Building Consent (LBC) application for determination by Welsh Ministers, attached for ease of reference, we wish to draw to your attention new evidence made publicly available on 31st July following an FOI to Cadw. We consider that this evidence strongly supports the need for the above application to be subject to independent scrutiny at public inquiry, particularly given that in this case the applicant is also the decision-maker. The above scheme is in conflict with national planning policies, and has caused significant controversy. We attach the following documents as supporting evidence:

- **Document A:** Gwynedd Council to Cadw - conservation officer comments, dated 30th January-3rd February 2025
- **Document B:** Cadw Inspector to Gwynedd Council - response to conservation officer comments, dated 30th January-3rd February 2025
- **Document C:** HMLR Title Plan, and Gwynedd Council to Cadw & others - note of meeting on 4th February 2025, dated 4th February 2025
- **Document D:** Cadw to Gwynedd Council - comments on updated structural report, dated 9th-11th April 2025
- **Document E:** Cadw to Gwynedd Council - comments on phone conversation, dated 29th-30th April 2025
- **Document F:** Cadw advice to Gwynedd Council re LBC, dated 14th-15th May 2025

- **Document G:** Cadw Head of Historic Environment Inspectorate letter to Gwynedd Council Assistant Head of Environment Department, dated 28th May 2025

1. Evidence of intent for total demolition of a listed building

New evidence suggests that the applicant, Gwynedd Council, has failed to consider retention, repair, or reinstatement of the Corbett Arms Hotel despite repeated warnings, both in initial correspondence from Cadw and from national heritage organisations. Cadw expressed serious concerns regarding the potential wholesale demolition of the hotel, warning the council on multiple occasions that their failure to consider alternatives to demolition was unacceptable. While on 3rd February the applicant was notified that the council's chosen structural engineer should be asked *"to consider demolition only as a last resort"* (see page 1, Document B), Cadw warned them again on 11th April that the Wye Valley Demolition Method Statement seemed *"to outline straight demolition of the entire structure"* and failed to allow for *"strengthening works to any of the 'cells', if they are found to be in a salvageable condition"* (see page 1, Document D). Cadw reiterated this point on 30th April – telling the applicant that the draft method statement *"does not demonstrate an intention to only undertake the minimum demolition works necessary to secure the building or to retain as much historic fabric as possible"* (see page 1, Document E). This final warning came following the submission by SAVE of a report by Jon Avent, a conservation-accredited engineer, on 28th April which clearly underlined that *"there is no justification at this stage for the full demolition of this listed building"*. We consider that this evidence all points towards the applicant having prepared for the total demolition of the grade II-listed building, rather than for its retention and reuse. This is **in contravention of national planning policy**, which states that *"the demolition of any listed building should be considered as exceptional and require the strongest justification"* (Planning Policy Wales (2024), para 6.1.12). We do not consider that the application submitted by Gwynedd Council themselves complies with national policy for the protection of listed buildings and consider this grounds for external scrutiny at public inquiry.

2. Evidence of failure to consider repair and retention

The submitted evidence suggests that the applicant has treated the demolition of the Corbett Arms Hotel as a foregone conclusion and has failed to adequately explore options for repair. The attached Document A demonstrates that before the completion of a structural report by Gwynedd Council's structural engineer, the council's conservation officer, who is also acting as case officer, referred to the report's *"inevitable conclusion"* that demolition would be necessary, and enquired about the delisting of the building in order to *"speed up the process"* of demolition (Document A, page 1). The failure to fully consider alternatives to demolition at this stage shows that the applicant has taken a demolition-first approach, rather than making a fully-informed and considered decision based on the findings of a conservation-accredited engineer.

We have seen no substantive evidence that the above application, submitted on 29th May 2025, only constitutes partial demolition of the Corbett Arms Hotel or substantially differs from the initial intent to apply for total demolition. We therefore consider that advice from the head of Historic Environment Inspectorate on behalf of Cadw to the assistant head of the Environment Department at Gwynedd Council that the 'present approach' taken by the applicant to apply for partial, rather than total, demolition *"would constitute alteration and*

be determined through the usual listed building consent process by your Authority" (page 1, Document G) was unsound. This is particularly concerning given evidence which reveals that Cadw had already been approached by the applicant regarding delisting and was thus aware of initial attempts to facilitate demolition without listed building consent (see Document A).

We have presented evidence prepared by our structural engineer to the Gwynedd Council to support our assertion that currently submitted proposals seek the demolition of at least 54% of the building and also that the proposed methodology would lead to the collapse of most of the rest of the building. We therefore **do not consider that the Shimizu ruling applies**, as Cadw has advised the council (see also pages 1-2, Document F), and as a result the application should be referred to Welsh Ministers for determination.

3. Evidence of intent to demolish and redevelop the site

We consider that Document C provides clear evidence that the applicant was planning for the redevelopment of the site rather than considering options for the building's repair. The council's planning manager was asked to *"confirm the possible density of housing that the site could take if redeveloped"* in order to *"use as basis in application for more moneys to Welsh Government to cover the £350k demolition costs"* (Document C, page 3). This enquiry regarding housing density was made on 11th February, ten days before the submission of the advisory structural report by the council's chosen structural engineer claiming that the building could not be salvaged and that he believed that demolition was required. We consider that this evidence indicates that applicant was once again seeking to build a case for the demolition of a grade II-listed building without any substantial evidence suggesting that it was necessary.

Conclusion

For these reasons, and those outlined in our letter of 23rd July, we consider there to be sufficient justification for the consideration of these proposals by Welsh Ministers.

I would be grateful for receipt of this letter and ask that you continue keep me informed of your decision pertaining to this call-in request.

Yours sincerely,



Conservation Officer