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Amity Planning Consultants

Eich cyfeirnod
Your reference

By Email

Ein cyfeirnod
Our reference

Dyddiad
Date

11 December 2024

Llinell uniongyrchol [Regulation 13 Personal Data]
Direct line

Ebost
Email:

cadwplanning@gov.wales

Dear Sir/Madam

Statutory pre-planning application for a change of use from hotel to dwelling houses at Buckland Hall, Bwlch.

Thank you for your letter of [date] inviting our comments on the pre-planning application consultation for the proposed development described above.

The following comments are based on information made available to us as part of the pre-application consultation and we will review our comments when we are consulted on the final planning application. Our assessment of the pre-application is given below.

Advice

We consider that the application is inadequately documented and we recommend that additional information is required to enable a balanced decision to be taken against Planning Policy Wales, Technical Advice Note 24 Historic Environment and associated guidance. Full details of the additional information that is required are explained in the below assessment.

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The national policy and Cadw's role in the planning process is set out in Annex A.

Assessment

The consultation is for a change of use of Buckland Hall, with no construction works being mentioned: However, the proposed plans show construction works both internally and externally being carried out to Buckland Hall itself and the construction of a new Energy Centre and a General Store building to the northeast of the main house. These changes along with the need to carry out arbicultural works to allow them, will have an impact on the Registered Buckland House Historic Park and Garden. This will be a material consideration in the determination of any application for this proposed development (see Planning Policy Wales 2024, section 6.1.19). Consequently, any application including the required construction works for this proposed development should be accompanied by an assessment of the impact of the proposed development on the registered historic park and garden, which should be prepared by a competent and qualified historic environment expert. In preparing this assessment, the expert should consider the advice given in the Welsh Government document "Managing Change to Registered Historic Parks & Gardens in Wales" and may find following the procedures outlined in Welsh Government document "Heritage Impact Assessment in Wales" helpful.

Scheduled Monuments

BR009 Castell Blaenllynfi

BR036 Tump Wood Camp

BR112 Llwyn-y-Fedwen Standing Stone

BR124 Bwlch Round Cairn

BR140 Gileston Standing Stone

BR153 Allt yr Esgair Camp

BR197 Enclosure W of Allt yr Esgair

BR271 Bwlch Enclosure

BR283 Tor y Foel Deserted Rural Settlement

BR423 Cefn Moel Round Houses

The above scheduled monuments are located inside 3km of the proposed development, but intervening topography, buildings and vegetation block all views between them. Consequently, the proposed development will have no impact on the settings of these scheduled monuments.

Finally, there may also be undesignated historic assets that could be affected by the proposed development and, if you have not already done so, we would advise that you consult the Historic Environment Record held by www.heneb.co.uk

Yours sincerely

[Regulation 13 Personal Data],
Case Officer
Historic Environment Branch



Annex A

Our role

Our statutory role in the planning process is to provide the local planning authority with an assessment concerned with the likely impact that the proposal will have on scheduled monuments, registered historic parks and gardens, registered historic landscapes where an Environmental Impact Assessment is required and development likely to have an impact on the outstanding universal value of a World Heritage Site. We do not provide an assessment of the likely impact of the development on listed buildings or conservation areas, as these are matters for the local authority.

It is for the local planning authority to weigh our assessment against all the other material considerations in determining whether to approve planning permission.

National Policy

Applications for planning permission are considered in light of the Welsh Government's land use planning policy and guidance contained in Planning Policy Wales (PPW), Technical Advice Notes and related guidance.

PPW [Planning Policy Wales - Edition 12 \(gov.wales\)](#) explains that it is important that the planning system looks to protect, conserve and enhance the significance of historic assets. This will include consideration of the setting of an historic asset which might extend beyond its curtilage. Any change that impacts on an historic asset or its setting should be managed in a sensitive and sustainable way.

The conservation of archaeological remains and their settings is a material consideration in determining a planning application, whether those remains are a scheduled monument or not. Where nationally important archaeological remains are likely to be affected by proposed development, there should be a presumption in favour of their physical protection in situ. It will only be in exceptional circumstances that planning permission will be granted if development would result in a direct adverse impact on a scheduled monument (or an archaeological site shown to be of national importance)

[Technical Advice Note 24: The Historic Environment](#) elaborates by explaining that when considering development proposals that affect scheduled monuments or other nationally important archaeological remains, there should be a presumption in favour of their physical preservation in situ, i.e. a presumption against proposals which would involve significant alteration or cause damage, or would have a significant adverse impact causing harm within the setting of the remains.

Historic Parks and Gardens

PPW also explains that local authorities should value, protect, conserve and enhance the special interests of parks and gardens and their settings included on the register of historic parks and gardens in Wales and that the effect of a proposed development on a registered park or garden or its setting should be a material consideration in the determination of a planning application.

