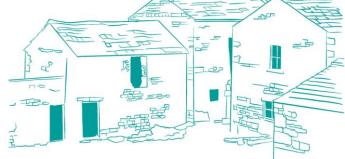


BUILDINGS ARCHAEOLOGY CASEWORK TEAM



A National Amenity Society

Planning Directorate Crown Buildings Cathays Park Cardiff CF10 3NQ

By email to: planning.directorate@gov.wales

31st July 2025

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

Dear Welsh Ministers,

The Council for British Archaeology (CBA) hereby register a request for the Welsh Ministers to call-in the above Listed Building Consent (LBC) application to be determined by the Welsh Ministers pursuant to powers set out in the Historic Environment (Wales) Act 2023.

Context to call-in request

The Corbett Arms Hotel is a Grade II Listed building (Ref. <u>4643</u>) dating from the early 19th century, extended c.1900. It is a prominent historic building within Tywyn that has historically made a substantial positive contribution to the town's historic built environment. This large and handsome hotel has stood vacant since 2011 and fallen into an increasingly derelict condition.

In early 2025 the building's condition became a matter of public safety when elements of the rear elevation collapsed. Gwynedd Council (the LPA) have been obliged to undertake urgent works to make safe the public realm. The LPA submitted an LBC application for the partial demolition of the building in May with the stated intention to dismantle elements of the building and secure remaining elements.

Whilst the CBA support the principle that the building must be stabilised to ensure public safety, we have substantial concerns about the proposed works, specifically the quantum and methodology of demolition proposed. The CBA submitted a formal objection to the Listed Building Consent application C25/0403/09/CR on 18th June [appended to this letter].

Justification for this call-in request

The CBA do not believe it is possible for Gywnedd Council to make an impartial decision on an application which they have themselves submitted. We believe the LPA's role as 'applicant' and the extent of demolition proposed to a Listed building makes C25/0403/09/CR a 'special case' under section 105 of the Historic Environment (Wales) Act 2023 that should warrant its independent determination by the Welsh Ministers. The CBA believe specific issues which make this a 'special case' include:

- Following public outcry and widespread opposition to Gywnedd Council's initial
 intention to demolish the entire structure (following the partial collapse) the LPA
 submitted this LBC application in the interests of transparency. For the same interests
 of transparency, it is important the decision maker is a third party, and not the
 applicant.
- The scope of works for the partial demolition and dismantling of the building by John Evans Associates, commissioned by the LPA, appears contrary to the stated intention to carry out the least demolition necessary to secure the rest of the structure. In response to works which appear to constitute an unjustified extent of initial demolition, including structurally stabilising components like spine walls and chimney breasts, an alternative partial demolition strategy has been outlined by a different company of Consulting Civil and Structural Engineers. A Structural Review undertaken by Mann Williams, instructed by SAVE Britain's Heritage, finds the zones and extent of demolition proposed in application C25/0403/09/CR to be contrary to the aim of stabilising the structure, unsupported by the LPA's monitoring of the building and not to be a solution 'of last resort'. The discrepancy between the two reports warrants objective assessment as part of the determination of this application. Especially since the alternative strategy presented by Mann Williams would better meet the requirements of PPW, policy 6.1.12 and TAN 24, paragraph 5.15.
- The LPA's involvement with the application site includes substantial investment in scaffolding the building, commissioning structural engineers reports and securing the site as part of their role of 'applicant' for this application. We do not believe it possible for the LPA to maintain a position of impartiality under these circumstances.
- We further note that the case officer allocated to this application is the LPA's
 Conservation Officer. This places her in an extremely difficult position. We do not
 question her integrity in any way but believe the situation she is
 placed in undermines her ability to comment as an objective
 conservation officer on the proposals submitted by her
 employer.

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ARCHAEOLOGY CASEWORK We are aware that Gwynedd Council have a protracted history of attempts to secure the conservation of the Corbett Arms, safeguarding its long-term future. However, we believe their role as 'applicant' and the discrepancies between the recommendations of civil engineers regarding how much of the Corbett Arms can be made structurally sound should preclude Gwynedd Council from determining this application.

We hope the justifications set out above satisfy the requirements for the Welsh Ministers to call in this application for independent assessment and determination.

Kind Regards,

Catherine Bell. MA (cons), ACIfA Listed Buildings Caseworker

The Council for British Archaeology (CBA) was established in 1944 and is the national amenity society concerned with protection of the archaeological interest in heritage assets. Local planning authorities have a duty to notify the CBA of applications for listed building consent involving partial or total demolition, under the procedures set out in **The Listed Buildings and Conservation Areas** (**Procedure and Interest Rate**) (**Wales**) **Regulations 2024.**

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APPENDIX

A National Amenity Society

Ms Eryl Williams Planning Case Officer Gwynedd County Council By email: cynllunio@gwynedd.llyw.cymru

18th June 2025

Corbett Arms Hotel, Corbett Square, Tywyn, LL36 9DG. Application No. C25/0403/09/CR

Dear Ms Williams,

Thank you for notifying the Council for British Archaeology (CBA) about the above application.

We are extremely concerned about the scope of works proposed to stabilise the listed building, which we believe would amount to an unjustified level of demolition. We are aware of an assessment undertaken by Mann Williams, a company of Consulting Civil and Structural Engineers, instructed by SAVE Britain's Heritage. Their Structural Review finds the zones and extent of proposed demolition to be contrary to the aim of stabilising the structure, unsupported by your LPA's monitoring of the building and not to be a solution 'of last resort'. As I am confident you will also be familiar with Mann Williams' report I will not repeat its findings in detail. However, I would like to state the CBA's objection to the currently proposed works as unjustified, based on the Mann Williams report's findings.

The CBA appreciate your LPAs duty to stabilise the building and prevent any further collapse, with its potential for serious impacts in the public realm. However, as a Grade II Listed building and prominent feature within the setting of neighbouring Listed buildings, its demolition "should be considered as exceptional and require the strongest justification" (PPW, Policy 6.1.12). We do not believe justification for the extent of demolition to be apparent. We recognise the need for careful dismantling of compromised aspects of the building but believe the imperative for demolition works to be 'exceptional' and with the 'strongest justification' should be understood as an imperative to minimise the extent of demolition to that necessary to stabilise the building. We agree that this will need to follow an iterative strategy, but based on the identified structural rigidity of the cross walls with chimney stacks and spine wall within the areas proposed for demolition, we do not believe that zones 1 – 5 should be demolished as an initial phase. The majority of the oldest parts of the

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building are located within these zones. We believe an iterative

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ARCHAEOLOG' CASEWORK approach should aim to retain as much of these early phases as possible.

The CBA urge your LPA to revise its approach towards the partial demolition of the Corbett Arms Hotel. We advise the contrary proposal presented in the Mann Williams report warrants consideration by the applicants as an alternative strategy that would better meet the requirements of PPW, policy 6.1.12 and TAN 24, paragraph 5.15. The CBA object to these proposals in their current form.

I trust these comments are useful to you; please keep the CBA informed of any developments with this case.

Kind Regards,

Catherine Bell. MA (cons), ACIfA Listed Buildings Caseworker

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