Ellie Jones

From: Ross Anthony <ross.anthony@hbap.org.uk>

Sent: 14 March 2025 12:22
To: Sharon Holman; planning_comments
Cc: Elgan Jones
Subject: Application Ref: P/2025/0242 - PICKHILL FARM, PICKHILL, CROSS LANES, WREXHAM, LL13 0UL

FAO: Sharon Holman

Address: PICKHILL FARM, PICKHILL, CROSS LANES, WREXHAM, LL13 0UL
Application Ref: P/2025/0242

Proposal: listed building consent for demolition of existing dwelling and erection of replacement dwelling.

Statutory Remit: Historic Buildings & Places (HB&P) is the working name of the Ancient Monuments Society and a consultee on Listed Building Consent applications, as per the Listed building applications and decisions (duty to notify National Amenities Societies and the Royal Commission) (Wales) Direction 2022. We are concerned with historic assets of all types and all ages, including conservation areas and undesignated heritage.

Comments: Thank you for notifying HB&P of the above application for listed building consent. HB&P **object** to the complete demolition of this grade II listed heritage asset. The building maintains a wealth of historic features, its plan form, and its historic character, and its significance is largely derived from the surviving historic building fabric and form as a good example of a C16 farmhouse. The complete loss of a heritage asset represents substantial harm.

The application fails the tests set out in Section 5.15 of TAN 24, which states:

An application for the demolition of a listed building should be made in exceptional circumstances and only as an option of last resort. Consent for demolition should not be given simply because redevelopment is economically more attractive than the repair and re-use of a historic building. The following factors need to be considered:

- *The condition of the building, the cost of repair and maintenance in relation to its importance and the value derived from its continued use. Where a building has been deliberately neglected, less weight will be given to these costs.*
- *The efforts made to keep the building in use or to secure a new use, including the offer of the unrestricted freehold of the building for sale at a fair market price that reflects its condition and situation.*
- *The merits of the alternative proposals for the site, including whether the replacement buildings would meet the objectives of good design and whether or not there are substantial benefits for the community that would outweigh the loss resulting from demolition.*

The application fails this test because:

- The application fails to fully understand the significance of the building and the surviving fabric.
- There has been clear neglect of the building. There appears to have been little effort made to secure the building and maintain it.
- The structural survey is lacking and does not demonstrate that the building is beyond repair. HB&P advise that any structural survey submitted in support of demolition of a listed building must be prepared by a CARE accredited structural specialist with expertise in historic buildings. Such a report should investigate all options for repair first, with demolition only considered as a 'last resort'. The applicant is directed to this website for advice: https://www.istructe.org/get-involved/supported-organisations/conservation-accreditation-register-for-engineers/
- There is no viability or marketing statement to indicate that it is not feasible to repair the building or that it has been marketed for another person to take on the necessary restoration and repairs.

Other Policy:
Historic Environment (Wales) Act 2023

Sch. 13 Para 90 In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.

s.160 In the exercise, with respect to any buildings or other land in a conservation area, any of the provisions mentioned in subsection (1), special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.

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6.1.6 Safeguard the character of historic buildings and manage change so that their special architectural and historic interest is preserved.

6.1.10 There should be a general presumption in favour of the preservation or enhancement of a listed building and its setting, which might extend beyond its curtilage. For any development proposal affecting a listed building or its setting, the primary material consideration is the statutory requirement to have special regard to the desirability of preserving the building, its setting or any features of special architectural or historic interest which it possesses.

6.1.12 The demolition of any listed building should be considered as exceptional and require the strongest justification.

Recommendation: Withdrawal or submission of appropriate documentation to address all the TAN 24 requirements, including a full structural survey prepared by a CARE accredited structural specialist with expertise in historic buildings. If that is not forthcoming, the application should be refused on heritage grounds.

Regards

Ross Anthony

Case Work

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Historic Buildings & Places is the working name of the Ancient Monuments Society, a registered charity in England and Wales (no. 209605). It is one of the National Amenity Societies and a consultee on Listed Building Consent applications as per the ***Arrangements for handling heritage applications – notification to Historic England and National Amenity Societies and the Secretary of State (England) Direction 2021***. We are concerned with historic assets of all types and all ages, including planning applications affecting historic buildings in conservation areas and undesignated heritage.