Council for British Archaeology

BUILDINGS ARCHAEOLOGY CASEWORK TEAM



A National Amenity Society

Ms Jenni Perkins
Planning Case Officer
Wrexham County Borough Council
By email: jenni.perkins@wreham.gov.uk

20th May 2025

67 King Street, Wrexham, Wales, LL11 1HR. Application: P/2025/0109

Dear Ms Perkins,

Thank you for notifying the Council for British Archaeology (CBA) about the above application. Based on the information supplied with this application, the CBA offer the following advice to assist you in your decision making.

Whilst the CBA are broadly supportive towards the adaptation of 67 King Street into an HMO, we are concerned by a lack of detail in the current proposals, which lack a Heritage Impact Statement as required by TAN 24 paragraph 5.12. This has the potential to unintentionally cause an unjustified level of harm to the listed building's significance, principally through impacts to historic fabric, through a lack of initial assessment and understanding about components that contribute to the site's special interest.

The Design and Access Statement states "CADW has not listed any part of the interior as being significant as part of their listed building assessment." This is a misunderstanding of list descriptions, which primarily identify the designated site rather than catalogue their most significant features. Internal photographs demonstrate restrained Georgian features, for example the principal staircase and fitted cupboards, which should be viewed as significant historic building fabric.

Whilst there are clearly modern finishes in the building, it appears that previous adaptations of the building may have had minimal impact on historic fabric; surface mounting electrics in plastic trunking, blocking up fireplaces (as opposed to removing them) and potentially installing false ceilings. It would be common to find historic fabric concealed underneath these modern finishes. The basement staircase may well have historic fabric underneath the modern treads. We therefore advise a cautionary approach to any opening up works or installation of new services, which should minimise any impacts on historic fabric.

We note the damp present in Room 1, with the hypothesis that a leaking downcomer has caused the issue. To protect, conserve and enhance the significance of the building, as required by *PPW, Edition 12,* we advise that any scheme of works to the building should include appropriate repair to this area of the building and allow this wall to dry out. It is important that measures to tackle damp in the building fabric are sympathetic to the properties of its historic fabric and do not entail any impermeable barriers which would lock moisture into the historic fabric.

The CBA advise that this application requires further detailing and potentially revision before it is able to achieve a positive planning outcome.

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

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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