

Mr Clive Ancrum  
Decisions Manager  
Planning Decisions Branch  
Welsh Assembly Government  
Cathays Park  
CARDIFF  
CF10 3NQ  
clive.ancrum@wales.gsi.gov.uk (by email only)

Phil Williams  
Development Manager.  
Development Control, Strategic Planning and  
Environment,  
City Hall,  
Cardiff CF10 3ND  
developmentcontrol@cardiff.gov.uk



10th November 2009

Dear Sirs,

**Cardiff Castle, Cardiff (Grade I, medieval, *W Burges*, 1868-1900): Listed Building Consent Application for installation of a lift, rising through three floors of the Western Apartments, to be located to the north east corner of the Entrance Hall and the Ante Room no. 09/1283**

**Cardiff Castle, Cardiff (Grade 1) Retention of Temporary Visitor Reception and associated hardstanding and fencing: Planning Application no. 09/01744/C**

One of Cardiff Civic Society's objectives is:

*To secure the preservation, conservation, protection, development and improvement of features of historic or public interest in the City of Cardiff.* The Society, in commenting on these proposals, is mindful of the Statutory and Policy Guidance for the protection of Wales's heritage assets.

*The Planning (Listed Buildings and Conservation Areas) Act 1990*, states that 'In considering whether to grant listed building consent for any works the local planning authority or 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' and further 'a local authority shall have regard to the desirability of preserving features of special architectural or historic interest, and in particular, listed buildings.' (Welsh Office Circular 61/96 Planning and the Historic Environment)

*Planning Policy Wales Chapter 6 'Conserving the Historic Environment'* states that one of its objectives is to:

'ensure that the character of historic buildings is safe-guarded from alterations, extensions or demolition that would compromise a building's special architectural and historic interest.'  
6.5.8 states that 'applicants for listed building consent **must** be able to justify their proposals'.

These aims have recently been reinforced by the Heritage Minister Alun Ffred Jones [http://www.cadw.wales.gov.uk/upload/resourcepool/Ambition\\_Statement\\_ENG8296.pdf](http://www.cadw.wales.gov.uk/upload/resourcepool/Ambition_Statement_ENG8296.pdf): 'Helping Welsh citizens to develop a real affinity with our historic environment is an integral part of the Welsh Assembly Governments approach to sustainability' and 'Conserving and protecting our historic environment has to be the starting point'.

The Civic Society is also mindful that Cardiff Castle is one of the most **exceptional** heritage buildings in the country. This status is reflected in its Grade 1 Listing which means that it is of **outstanding** architectural and historic interest.

The proposal to install a further disabled lift on site suggests that the Council is overlooking the historic and **international** significance of the Victorian, Burges decorated House and this will seriously compromise the House.

We feel the requirements of the Disability Discrimination Act requiring building owners to make reasonable attempt to provide access, have already been met with the provision of a disabled lift in the new Visitor/Interpretation Centre, which we consider an appropriate solution within the context of a Grade 1 Listed building. Further, it seems that a properly evidenced Justification Statement and Heritage Impact Assessment have not been prepared and there is a clear lack of integration with the HLF funded Conservation Management Plan.

With regard to the second application - for retention of the temporary visitor facilities in 'portacabins' - the Planning Inspector refused the previous proposals for the visitor facilities, because of 'the effect .. on the setting on the listed buildings', whilst noting the need to 'preserve the appearance of the Conservation Area within which the Castle is situated'. The detailed commentary explaining the refusal guided the redesign and accounted for a Visual Impact Assessment. The redesign of the facilities allowed ample room for all the required activities based on realistic future demands and justification guided by the Inspectorate's decision.

There is a serious issue of the very damaging impact of these temporary and poor quality structures on the essential setting of the monument and its integral historic landscape. Temporary permission was granted subject to their removal upon completion of the new permanent centre. This temporary permission was only granted to facilitate the building process, whilst also protecting the relict Brownian landscape and other archaeological features.

It should be noted that Cardiff Civic Society members took action to draw the planning authority's attention to the fact that the temporary consent had lapsed: its enforcement officer refused to enforce the condition for removal on the grounds that it would not act against its own authority.

**It is clear that in order to advance our charitable objectives we are obliged to object to both proposals and recommend that both applications be refused permission.**

Additionally, we are sending this letter jointly to Planning Decisions Branch at WAG in order to make them aware of our concerns at the way in which Cardiff County Council is managing planning applications for developments on Listed Buildings and to formally ask that the retrospective Temporary Visitor centre application should be Called In for determination alongside that for the lift.

**For and on behalf of Cardiff Civic Society**

**David Eggleton**  
**12a Fairleigh Road, Pontcanna,**  
**Cardiff CF11 9JT**  
**Tel: 07986 117224**  
[jh.eggleton@ntlworld.com](mailto:jh.eggleton@ntlworld.com)