



## **Design and Access Statement**

**Grade II\* Listed Building**

**Conversion of existing nursing home into residential accommodation**

**Plas Abermad, Llanfarian, SY23 4ES**

**May 2025**

**Our ref: Z005**

## **SUMMARY**

### **Proposal**

Conversion of existing nursing home to residential accommodation

### **Location**

Plas Abermad Mansion, Llanfarian, Ceredigion, SY23 4ES

### **Date**

May 2025

### **Project Ref**

Z005

### **Applicant**

Mr & Mrs Sandford

### **Planning authority**

Ceredigion County Council

### **Statement prepared by**

Oliver O'Neill BA Hons MArch PGDip ARB

Hughes Architects

29 Broad Street

Newtown

Powys

SY16 2BQ

### **Statement checked by**

Doug Hughes RIBA CA BA(Hons) DipArch

Hughes Architects

29 Broad Street

Newtown

Powys

SY16 2BQ

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## 1.0 INTRODUCTION

This Design and Access Statement is written and submitted by Hughes Architects on behalf of Mr & Mrs Sandford, in order to inform proposals to convert a Grade II\* Listed building from a nursing home into residential accommodation. Illustrations supplied or sourced for this document are copyright of Hughes Architects unless credited accordingly.

This Statement has been prepared in support of a full planning application for the conversion of Plas Abermad, a former nursing home, into a number of high-quality residential units. The proposals represent a sustainable and sensitive reuse of a significant historic building that has remained unoccupied for some time and is currently in a deteriorating state. The application seeks to bring the property back into viable long-term use through minimal and carefully considered interventions, while preserving and enhancing its historic character and architectural integrity.

The conversion will deliver much-needed housing in the local area, support the continued upkeep of a landmark High Victorian Gothic building, and provide a sustainable future for a structure that is currently vulnerable. This statement sets out the planning justification for the proposals, assessing them in the context of national and local planning policy, as well as heritage and design considerations, and demonstrates that the scheme is appropriate, proportionate, and beneficial both to the building and the wider community.

This planning statement is supported by the following set of drawings and reports:

Drawing Number	Drawing Name	Prepared By
Z005.1.3.001	Location Plan	Hughes Architects
Z005.1.3.002	Proposed Elevations	Hughes Architects
Z005.1.3.100	Existing Floor Plans	Hughes Architects
Z005.1.3.101	Existing GA Sections	Hughes Architects
Z005.1.3.102	Site Plan and Green Infrastructure Statements	Hughes Architects
Z005.1.3.200	Proposed Accommodation Schedule	Hughes Architects
Z005.1.3.201	Proposed Lower Floor Plan	Hughes Architects
Z005.1.3.202	Proposed Ground Floor Plan	Hughes Architects
Z005.1.3.203	Proposed First Floor Plan	Hughes Architects
Z005.1.3.204	Proposed Second Floor Plan	Hughes Architects
Z005.1.3.210	Proposed Elevations	Hughes Architects
Z005.1.3.100	Proposed Sections	Hughes Architects
Z005.1.3.600	Proposed Fabric Heritage Significance Plans	Hughes Architects
Z005.1.3.601	Proposed Fabric Heritage Significance Elevations	Hughes Architects
-	Heritage Impact Assessment	Hughes Architects
-	Bat Report	DAVE ROGERSON, S090164-1
-	Viability Assessment	-
256015	Chimney Stack Survey	BARRATT ASSOCIATES

## 2.0 SITE DESCRIPTION

- 2.1 Plas Abermad is situated in the gently undulating rural landscape of Ceredigion, approximately 3 miles from Aberystwyth. The property occupies a prominent position within its own grounds, which include mature trees, overgrown lawns, and remnants of a once formally arranged garden, contributing to the site's historic character. The immediate surroundings are predominantly agricultural and low-density residential, with views across open countryside enhancing the sense of seclusion and historic rural setting. Plas Abermad is a Grade II\* listed building, recognised for its exceptional architectural and historic significance as a rare and refined example of High Victorian Gothic design in Wales. Although currently vacant, the site remains accessible from the local road network and is within close reach of Aberystwyth,
- 2.2 Plas Abermad is a substantial three-storey Victorian country house constructed between 1870 and 1872, designed by the renowned architect John Pollard Seddon. The building showcases the rich architectural vocabulary of High Victorian Gothic, including the use of local stone with Bath stone dressings, steeply pitched roofs, polychromatic masonry detailing, and pointed arch windows. The principal elevations retain a high degree of integrity, with original features such as carved stone elements, decorative ironwork, and elaborate stained glass by F. Vincent Hart. Internally, the house contains a series of large formal state rooms, though many are now in a state of disrepair following its later conversion to and use as a nursing home. Despite some unsympathetic modern interventions, the core layout and a large number of original features—such as fireplaces, staircases, joinery, and decorative plasterwork—survive and contribute to the building's overall significance.
- 2.3 The building was most recently used as a care facility, a use which resulted in significant subdivision of the internal spaces but little alteration to the external form. The building is now vacant and in a deteriorating condition, with clear evidence of water ingress, fabric degradation, and loss of decorative finishes in some of the principal rooms. This proposal seeks to restore the building's integrity through a sympathetic residential conversion, introducing a viable long-term use that secures the future of the asset. The grounds, though currently overgrown, retain historic elements such as boundary walls, former garden layouts, and planting which contribute to the setting and offer opportunities for enhancement as part of the scheme.

### 3.0 HISTORY & BUILDING CONDITION

#### History

- 3.1 Plas Abermad was built in 1870 as a private mansion by J.P. Seddon for Lewis Pugh after he bought the estate from the Vaughans of Trawsgoed in 1852. Abermad is regarded as one of the most important High Victorian Gothic houses in Wales by Cadw; this being echoed by the original drawings on display at the Victoria and Albert Museum, London. These aspects combined with the particularly high quality of interior details are what lead the building to become Grade II listed in 1989.
- 3.2 During the 20th century the building was utilised as a private school until it transitioned to a nursing home for those with special needs which was unfortunately closed in 2022 due to insufficient staffing. Since 2022 the building has seen minimal upkeep and has recently been purchased by Mr & Mrs Sandford as a means to bring life back into this prime example of Welsh architecture.



Figure 01. Building from above, Haha to the East and newer houses unbuilt to the West

### 3.0 HISTORY & BUILDING CONDITION

#### Cadw Listing

*“The building is three storeys high with dark coloured snecked masonry with grey quoins and relieving arches and Douling window dressings. The roof is of slate with tiles cresting and stone chimney stacks, splayed out to the base. The interior is especially fine with strong Gothic details. Stained glass at the house was designed by F. Vincent Hart and made by G. E. Cooke. Abermad is one of the finest examples of High Victorian Gothic houses in Wales. The building is Grade II\* listed as an exceptionally complete High Victorian Gothic country house by a major architect, which has retained high quality interior detail.” Cadw*

#### Current State

The building is currently in a poor state of repair as it has been unoccupied since the closure of the nursing home in Summer 2022. In its use as a nursing home and a school a number of insensitive interventions were added internally to improve its former function and increase the number of rooms. Externally a covered terrace was removed on the East facing facade to be replaced with a modern fire escape. A modern lift was installed. The grand rooms to the ground floor the East, are mostly unaltered with minor additions to allow its function as a care home.

The immediate context has also undergone significant changes since the original house was built. The front now has two modern bungalows on the site directly facing the building. The two original ha-has to the East are now less visible than in the original photos (figure 01.). The Northwest is assumed to have undergone quite major changes, although it is uncertain what may have been there before and welcome any evidence the LPA may have.



Figure 02. Photo towards South Facing and West Facing Elevations. Plus exterior mainly in good condition



Figure 03. Photo towards porch. This area has undergone now undergone some repair work as part of a previous LBC application

### 3.0 HISTORY & BUILDING CONDITION

Existing Photos Page 01



Figure 04. Photo towards East facing elevation porch. Away from prevailing coastal wind so in good condition



Figure 05. Photo towards West facing elevation first floor windows .These sash windows will be secondary escape windows



Figure 06. Photo of west facing dormer window. Timber in good condition.



Figure 07. Photo of ornate hoppers. To be retained



Figure 08. Photo of damaged stonework around porch. Currently being repaired



Figure 08. Photo of principal lobby. Mostly in good condition and to be retained in current condition with some decorating / minor repairs

### 3.0 HISTORY & BUILDING CONDITION

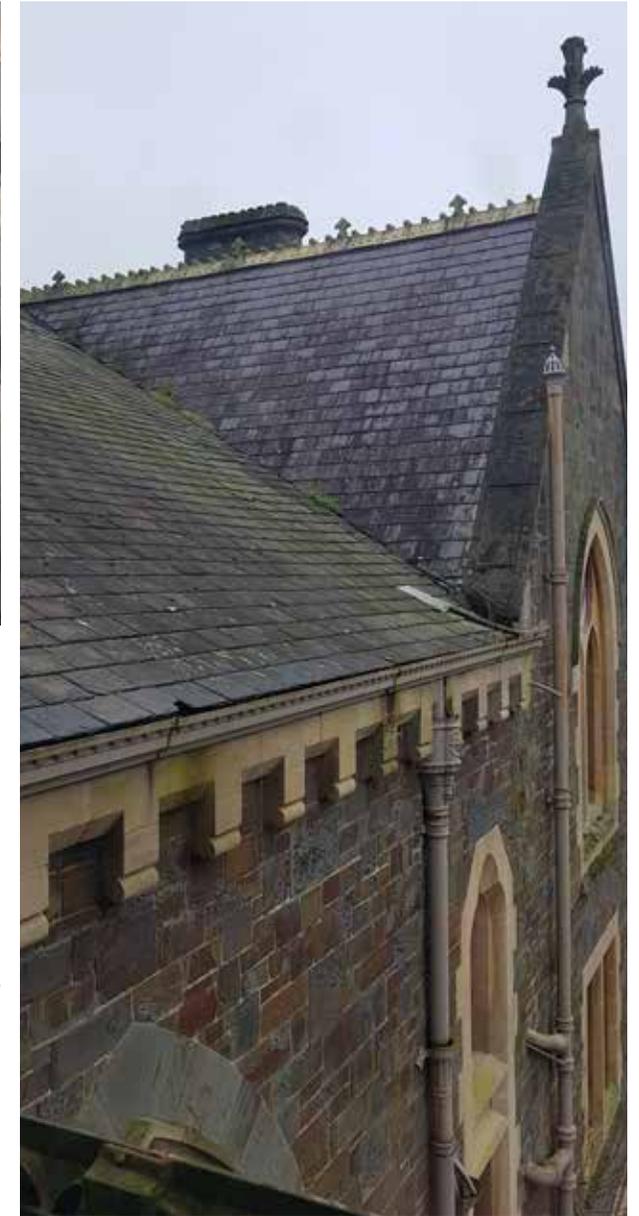
Existing Photos Page 02

Figures 09 - 13 and 14-18 (left to right). These photos show areas of low significance, where modern partitions and poor-quality finishes have compromised the historic character. Damaged plasterwork, inappropriate materials, and unsympathetic alterations offer an opportunity for sensitive repair and reconfiguration, enhancing the building's overall coherence without loss of historic value.



### 3.0 HISTORY & BUILDING CONDITION

Existing Photos Page 03



Figures 19 - 22 (left to right). These images show key high-significance spaces at Plas Abermad, both internally and externally. Internally, the principal staterooms and stairs retain exceptional decorative features, including ornate plaster ceilings, carved timberwork, and original joinery. Externally, finely dressed stonework, carved detailing, and window tracery reflect the craftsmanship of Seddon's original design. While these elements are largely intact, areas of deterioration—such as minor plaster cracks, weathered stone, and localised timber decay—require careful, like-for-like repair. All works in these areas will be minimal, reversible, and carried out using traditional materials and methods to preserve the building's architectural integrity.

## 4.0 PLANNING HISTORY

763020 (full planning)	Extension and improvements (The Lodge, Abermad)	Approved 30.11.1976
840804 (full planning)	Use as residential care home for the aged	Approved with conditions 23.01.1985
850286 (full planning)	Bungalow for staff	Approved with conditions 24.06.1985
870778 (full planning)	Bungalow	Approved with conditions 23.10.1987
931289 (var / removal of condition)	Removal of condition 2 (use in connection with adjacent home)	Refused 10.02.1994
940086 (outline)	15 single bed apartments, sheltered housing / retirement village	Refused 21.03.1994 Dismissed on appeal
940087 (outline)	Sheltered housing / retirement village – 7 bungalows	Refused 21.03.1994 Dismissed on appeal
940088 (outline)	Sheltered housing / retirement village - 5 bungalows	Refused 21.03.1994 Dismissed on appeal
990397 (full planning)	Erection of single storey extension (The Lodge, Abermad)	Approved with conditions 16.06.1999
A001137 (var / removal of condition)	Removal of condition 2 of 850286 (occupancy condition)	Approved with conditions 15.12.2000
A030389 (full planning)	Variation / removal of condition from residential home for the aged to residential care home with nursing for substance misusers	Approved with conditions 18.06.2003
A210418 (householder planning)	Erection of double garage with home office above (Maliks – adjacent)	Approved with conditions 09.06.2021
A220649 (Certificate of lawful use)	C3 dwelling house (Maliks – adjacent)	Certificate granted 21.06.2023
A230574 (listed building consent)	Internal alterations to bedrooms to create an en-suite in each one	Withdrawn 01.09.2023

### Cyngor Sir CEREDIGION County Council

Russell Hughes-Pickering  
Planning Consultant / Licensed as Architects  
Corporate Lead Officer - Economy and Regeneration  
Town & Country Ceredigion, Penrhy, Manserv, SY23 4ES  
www.ceredigion.gov.uk



#### PLANNING DECISION

The Historic Environment (Wales) Act 2023

The Listed Buildings and Conservation Areas (Procedure and Interest Rate) (Wales) Regulations 2024

#### NOTIFICATION OF DECISION ON APPLICATION FOR LISTED BUILDING CONSENT

##### Applicant:

Mark Sandford  
Plas Abermad Nursing Home, Abermad Mansion  
Llanfarian  
Aberystwyth  
Ceredigion  
SY23 4ES

##### Agent:

Oliver O'Neill  
Hughes Architects  
25 Broad Street  
Newtown  
SY16 2BG

Application No: A240655 Grid Ref: 260026.49 276091.53

In pursuance of its powers under the above mentioned Act, CYNGOR SIR CEREDIGION COUNTY COUNCIL as the Local Planning Authority hereby consents to:

Repair work to roof, lean to and porch structures.  
Abermad Mansion, Llanfarian, SY23 4ES

Subject to the following conditions:

- The works covered by this consent must be begun no later than the expiration of 3 years beginning with the date of this consent.
- The development shall be carried out in accordance with the following approved plans and documents:
  - Location plan, received 16th September 2024
  - Existing and proposed block plan, received 30th August 2024
  - Abermad Mansion Bat Report Version 1, dated 2nd September 2024 Dave Rogerson, received 30th October 2024
  - Method statement to be used with a bat development licence application – Abermad, Aberystwyth Version 2, dated 09/11/2024 Dave Rogerson, received 22nd November 2024
  - Abermad Mansion Conservation Plan (ecology) Dave Rogerson, received 22nd November 2024
  - Biosecurity Risk Assessment (ecology), received 22nd November 2024
  - Heritage Impact Assessment Abermad Mansion, received 18th September 2024
  - Condition report for the porch masonry (and methodology), Abermad Mansion Llanfarian, Aberystwyth SY23 4ES by Archstone Masonry Ltd
  - Drawing showing porch masonry repairs by Richard Waite Masonry Services, Architectural Stone Masonry Specialists, dated 12th June 2024, received 30th August 2024
- Prior to commencement, a method statement for the repair works which includes details of works to the roof, of any timber repairs required, and the protection of historic features and fabric shall be submitted to and approved in writing by the Local Planning Authority. The works shall proceed in strict accordance with the approved details.

*A240655 LBC approval for repairs to roof under current applicant. Consented 08-01-2025*

*While not technically a planning application, the pre-application response A240100 is included in the appendix*

## **5.0 PLANNING POLICY**

### **National Planning Policy**

#### **Planning Policy Wales (PPW) – Edition 12**

Technical Advice Note 6 (TAN 6): Planning for Sustainable Rural Communities

Technical Advice Note 12 (TAN 12): Design

Technical Advice Note 24 (TAN 24): The Historic Environment

### **Ceredigion Local Development Plan (LDP) (Adopted April 2013)**

Policy S01 – Sustainable Growth

Policy S04 – Affordable Housing Provision

Policy S05 – Provision of Affordable Housing

Policy LU02 – Lifetime Homes and Accessible Housing

Policy LU07 – Subdivision of Dwellings

Policy LU24 – Provision of Open Space

Policy DM06 – Re-use and Adaptation of Rural Buildings

Policy DM17 – Design and Place-Making

Policy DM19 – Listed Buildings

Policy DM20 – The Historic Environment

## **5.0 SUMMARY PRE-APPLICATION ADVICE: DATED 17/07/24**

### **Policy Position and Open Market Housing**

The Local Planning Authority (LPA) advised that the proposed residential use must demonstrate a specific local need or a need for a rural enterprise dwelling in line with Technical Advice Note 6. As the current proposal implies open market residential use, it would normally be contrary to LDP Policy S04, which restricts such use unless justified by local housing need or rural enterprise necessity.

### **Material Considerations and Viability**

Despite the conflict with S04, the LPA acknowledged that the preservation and reuse of a Grade II\* listed building is a significant material consideration. In accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004, planning decisions should be made in line with the development plan unless material considerations indicate otherwise. The only other viable use is to continue and refurbish the building as a care home. The applicant has made multiple attempts to secure a possible tenant but hasn't been successful. So it can be demonstrated that no other viable use exists, the change of use to open market residential accommodation may be deemed acceptable in principle.

### **Preferred Alternative Uses**

The LPA emphasised that its preferred outcome would be for the building to be converted to holiday accommodation, followed by affordable housing, especially in light of local need as identified in the most recent Local Housing Market Assessment. Open market residential use would only be acceptable as a last resort, subject to robust viability justification. A viability assessment to justify build to rent apartments is included as part of this application.

### **Affordable Housing Expectations**

Under Policy S05, the LPA typically expects 20% of units on residential schemes to be affordable. For a 10-unit development, this would mean two affordable homes. The proposal currently does not include any affordable housing, and the LPA noted that a reduction in provision must be justified by a site-specific viability assessment. This will be provided at application stage to inform the final percentage, which will be secured via S106 agreement.

### **Design Quality and Lifetime Standards**

Policy LU02 requires new residential developments to meet Lifetime Homes Standards as far as reasonably practicable. Although it is recognised that achieving all 16 criteria may not be possible given the historic nature of the building, the LPA expects the proposal to go as far as possible in aligning with these standards.

## **5.0 SUMMARY PRE-APPLICATION ADVICE: DATED 17/07/24**

### **Subdivision and Residential Amenity**

As the proposal includes the subdivision of an existing building into multiple units, Policy LU07 applies. The LPA set out the following requirements: The building must be of a size and layout that allows conversion without substantial extension. Adequate soundproofing must be provided between units. The proposal must not lead to significant parking problems. Suitable refuse storage must be incorporated. The mix of units should include 3- and 4-bedroom apartments where local need exists and the building can accommodate them.

### **Loss of Community Facility**

Given that Plas Abermad was last used as a nursing home, the LPA requires justification for the loss of this community use. As per Policy LU07, the applicant must demonstrate that: There is alternative provision of equivalent community value in the area; There is a surplus of existing community provision; or The existing use is no longer viable and no alternative community use can be sustained. A report addressing this will be submitted as part of the application.

### **Open Space Provision**

In accordance with Policy LU24 and the Open Space SPG, the LPA requires open space on developments with more than 10 bedrooms. The proposal currently comprises 15 bedrooms across all units, triggering the need for 0.042ha of natural amenity green space on-site. This has been factored into the landscape strategy and indicative layout.

### **Conclusion of LPA Advice**

In summary, the LPA recognised that while the proposal is contrary to some development plan policies, notably S04, the safeguarding of a listed building is a compelling material consideration. The proposal may be supported if it is clearly demonstrated to be the only viable option and if efforts are made to meet other policy expectations, particularly in relation to affordable housing provision, amenity, design standards, and open space.

## 6.0 POLICY COMPLIANCE

**Compliance with Policy S04 and S05 – Affordable Housing :** The proposed development includes the provision of affordable housing, in accordance with Policies S04 and S05 of the Ceredigion Local Development Plan. The LDP seeks a target of 20% affordable housing on qualifying residential developments, which in this case would equate to two of the ten proposed units.

However, the building is a Grade II\* listed asset, and its conversion involves considerable costs related to specialist conservation work, material specification, and servicing constraints. A viability assessment is submitted alongside this application to demonstrate the level of affordable provision that is realistically achievable while ensuring the heritage-led scheme remains deliverable.

The applicant is committed to delivering affordable housing on-site, with the final proportion to be agreed with the Local Planning Authority based on the outcomes of the viability assessment. This approach is supported by Policy S05, which allows for negotiated reductions in affordable provision where justified by site-specific financial evidence.

**Compliance with Policy LU02 – Lifetime Homes :** Each of the proposed units has been designed, as far as reasonably practicable within the constraints of a listed building, to comply with Lifetime Homes standards. This includes level thresholds where possible, adequately sized circulation spaces, and the ability to adapt key areas such as bathrooms and kitchens to support future accessibility needs.

**Compliance with Policy LU07 – Subdivision of Dwellings :** The proposed subdivision of Plas Abermad meets the requirements of LU07. The property is of sufficient size and layout to allow subdivision without substantial external alteration. Each unit is self-contained, with adequate internal space, soundproofing, refuse storage and private amenity access provided. Parking provision has also been integrated in accordance with highways advice. A mix of unit sizes, including larger 2- and 3-bedroom homes, addresses identified local need for family-sized flats.

**Compliance with Policy LU24 – Provision of Open Space :** The proposal includes more than 10 bedrooms, triggering open space requirements under Policy LU24. A landscaped communal garden space is proposed to the side of the building, providing in excess of the minimum amenity space. This space will enhance the setting of the building while offering meaningful outdoor amenity for residents.

**Compliance with Policy DM06 – Re-use of Rural Buildings:** This proposal demonstrates a sustainable and sensitive reuse of a substantial existing building. The building's location, layout and structure lend themselves to residential use without extensive alteration. The change of use will secure the long-term viability of this heritage asset and represents the most feasible route to its conservation.

**Compliance with Policies DM17, DM19 and DM20 – Design and the Historic Environment:** All works have been designed in consultation with conservation specialists to ensure that they preserve or enhance the character and appearance of the Grade II\* listed building. Historic features are retained and restored, with new interventions designed to be reversible, legible, and sympathetic to the building's historic fabric. A full Heritage Impact Assessment has been submitted alongside this application.

## 7.0 RELEVANT MATTERS

**Highways & Access-** The proposed development will not result in any changes to the existing access arrangements, which have been assessed as suitable for the current use of the site which is currently unlimited.

**Parking** - for the proposed development will be provided to the rear of the property, ensuring that it is both discreet and in keeping with the character of the site. The provision will meet the relevant standards set out by Ceredigion County Council, offering sufficient capacity for residents and visitors. The layout has been carefully considered to maintain accessibility while preserving the site's setting and visual amenity.

**Ecology** - The proposed development includes a commitment to improving the site's ecological value through targeted biodiversity enhancements. Measures will be implemented to create additional habitats suitable for local wildlife, including native planting schemes, bird and bat boxes, and wildflower-rich grassland areas. These enhancements will support species diversity and ecological connectivity, contributing positively to the local environment and aligning with planning policies that promote biodiversity net gain.

**Sustainable drainage and flooding** - The proposed development will not result in an increase in impermeable surfaces and therefore does not require the implementation of additional surface water drainage infrastructure. As such, a Sustainable Drainage Approval Body (SAB) application is not required. The existing drainage arrangements are sufficient to accommodate the proposed works without increasing flood risk or surface water runoff.

**Land Contamination** - A preliminary review of the site has confirmed that there are no known contamination issues associated with the land. The area has historically been used as part of the gardens and grounds of the property, and there is no evidence to suggest any previous activities that might have caused contamination. As such, no further investigation or remediation measures are deemed necessary, and the site is considered suitable for the proposed development in its current condition.

**Visual Impact** - The proposed development does not involve any external alterations to the building, other than the addition of 1 no. rooflight and 1 no. AOV. As such, there will be a very minor change to the visual appearance of the property or its setting. The proposal will therefore have no impact on the character or visual amenity of the surrounding area.

**Refuse** - A new enclosed external refuse store is proposed to the rear of the building to provide secure, weather-protected waste storage for occupants. The structure will be constructed using durable, low-maintenance materials in a design that complements the existing building. It will include screened access doors and adequate ventilation, ensuring compliance with local authority waste management requirements and minimising visual and environmental impact.

## 7.0 RELEVANT MATTERS

**Foul drainage** -The proposed development includes the introduction of new bathrooms and kitchens as part of the building's conversion. As such, an upgrade to the existing waste treatment plant will be undertaken to increase its capacity and ensure it can adequately accommodate the additional demand. This upgrade will ensure compliance with environmental regulations and avoid any risk of overloading the current system. No new foul drainage routes beyond the site boundary are proposed, and all drainage will be managed within the curtilage of the site.

**Proposed External Lighting** -The proposed development will include the installation of low-level, ecology-friendly external lighting to provide safe and discreet illumination of access routes and entrances. All lighting will use warm-colour LED fixtures, be downward-facing and shielded to prevent light spill, and will operate on motion sensors where appropriate. This approach minimises impact on nocturnal wildlife, particularly bats, and ensures compliance with guidance on external lighting in sensitive rural and ecological contexts. The lighting strategy balances the functional needs of the development with a clear commitment to protecting local biodiversity and dark skies.

**Sustainability and Energy Efficiency** - The proposed works include the installation of internal wall insulation (IWI) in selected less historically sensitive rooms, alongside improved insulation within the ceiling build-up. These measures are designed to enhance the building's thermal performance while respecting the significance of the heritage asset. By reducing heat loss and improving overall energy efficiency, the proposals contribute positively to long-term sustainability goals, supporting reduced energy consumption and lower carbon emissions in line with national and local climate targets. All insulation will be breathable and appropriate for use in traditional buildings, ensuring compatibility with the existing fabric.

## 8.0 CONCLUSION

The proposed works at Plas Abermad are necessary to secure the long-term future of this nationally significant example of High Victorian Gothic architecture. A sensitive and well-informed conversion to residential use offers a sustainable and viable future for the building, preventing further decline and enabling ongoing care and occupation. The project recognises and respects the building's evidential, historical, aesthetic, and communal values, ensuring that its architectural character and layered history remain legible and appreciated. By concentrating modern interventions in less sensitive areas and applying reversible, conservation-led strategies throughout, the scheme allows Plas Abermad to adapt to contemporary needs without compromising its heritage significance. Ultimately, this project represents a positive model for the continued stewardship of a historic asset, offering a balance between preservation and practical re-use.

### **Disclaimer**

*This report has been prepared for the sole and exclusive use of Mr & Mrs Sandford for whom it was commissioned and has been prepared in response to their particular requirements and brief. This report may not be relied upon by any other party.*

*The Contracts (Rights of Third Parties) Act 1999 shall not apply to this report and the provisions of the said Act are expressly excluded from this report. This report may not be used for any purpose other than that for which it was commissioned. This report may not be reproduced and/or made public by print, photocopy, microfilm or any other means without prior written permission of Hughes Architects. The conclusions resulting from this study and contained in this report are not necessarily indicative of future conditions or operating practices at or adjacent to the site. Much of the information presented in this report is based on information provided by others. That information has neither been checked nor verified by Hughes Architects.*

# 9.0 APPENDICES



**Russell Hughes-Pickering**  
 Swyddog Arweiniol Corfforaethol : Economi ac Adfywio  
 Corporate Lead Officer : Economy and Regeneration  
 Nesaudd Cyngor Ceredigion, Penmorfa, Aberaeron, SA46 0PA  
 www.ceredigion.gov.uk

Mr Rhys Farmer  
 Hughes Architects  
 29 Broad Street  
 Newtown  
 Powys  
 SY16 2BQ

Dyddiad  
 Date 22<sup>nd</sup> July 2024  
 Gofynnwch am  
 Please ask for Eleanor Carpenter  
 Llinell uniongyrchol  
 Direct line  
 Ffôn / My ref  
 My ref Q240100  
 E-bost  
 Email eleanor.carpenter@ceredigion.gov.uk

Dear Sir,

**Planning (Listed Buildings and Conservation Areas) Act 1990**  
**Town and Country Planning Act 1990**  
**Pre-application advice – Plas Abermad, Llanilar, Ceredigion**

Thank you for your pre-application enquiry relating to the conversion of the existing nursing home into residential accommodation (10 no. self contained flats) and associated interior alterations.

Plas Abermad is a Grade II\* listed building located within a rural area and was listed in 1989 as an exceptionally complete High Victorian Gothic country house by a major architect, retaining particularly high quality interior detail.

The site is located within the Ystwyth Valley Special Landscape Area and there is a Tree Preservation Order (TPO) applied to the site.

**Relevant planning history**

Planning application number	Proposal	Decision
751860 (full planning)	Conversion of Abermad into 3 residential units	Approved with conditions 17.03.1976
751689 (outline)	Development of grounds as leisure area	Withdrawn 17.05.1976

Rydym yn croeso i gyswllt yn Gymraeg a Saesneg. Cwch ateb Cymraeg i bob gobeithiad Cymraeg ac ateb Saesneg i bob gobeithiad Saesneg. Ni fydde gobeith yn Gymraeg yn arwain at weid.  
 We welcome correspondence in Welsh and English. Correspondence received in Welsh will be answered in Welsh and correspondence in English will be answered in English. Corresponding in Welsh will not resolve any delay.

Prif Weithredwr / Chief Executive : Eifion Evans  
 Cyfarwyddwr Corfforaethol / Corporate Director : Barry Rees



**Russell Hughes-Pickering**  
 Swyddog Arweiniol Corfforaethol : Economi ac Adfywio  
 Corporate Lead Officer : Economy and Regeneration  
 Nesaudd Cyngor Ceredigion, Penmorfa, Aberaeron, SA46 0PA  
 www.ceredigion.gov.uk

Mr Rhys Farmer  
 Hughes Architects  
 29 Broad Street  
 Newtown  
 Powys  
 SY16 2BQ

Dyddiad  
 Date 22<sup>nd</sup> July 2024  
 Gofynnwch am  
 Please ask for Eleanor Carpenter  
 Llinell uniongyrchol  
 Direct line  
 Ffôn / My ref  
 My ref Q240100  
 E-bost  
 Email eleanor.carpenter@ceredigion.gov.uk

Dear Sir,

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 We welcome correspondence in Welsh and English. Correspondence received in Welsh will be answered in Welsh and correspondence in English will be answered in English. Corresponding in Welsh will not resolve any delay.

Prif Weithredwr / Chief Executive : Eifion Evans  
 Cyfarwyddwr Corfforaethol / Corporate Director : Barry Rees

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763020 (full planning)	Extension and improvements (The Lodge, Abermad)	Approved 30.11.1976
840804 (full planning)	Use as residential care home for the aged	Approved with conditions 23.01.1985
850286 (full planning)	Bungalow for staff	Approved with conditions 24.06.1985
870778 (full planning)	Bungalow	Approved with conditions 23.10.1987
931289 (var / removal of condition)	Removal of condition 2 (use in connection with adjacent home)	Refused 10.02.1994
940086 (outline)	15 single bed apartments, sheltered housing / retirement village	Refused 21.03.1994 Dismissed on appeal
940087 (outline)	Sheltered housing / retirement village – 7 bungalows	Refused 21.03.1994 Dismissed on appeal
940088 (outline)	Sheltered housing / retirement village - 5 bungalows	Refused 21.03.1994 Dismissed on appeal
990397 (full planning)	Erection of single storey extension (The Lodge, Abermad)	Approved with conditions 16.06.1999
A001137 (var / removal of condition)	Removal of condition 2 of 850286 (occupancy condition)	Approved with conditions 15.12.2000
A030389 (full planning)	Variation / removal of condition from residential home for the aged to residential care home with nursing for substance misusers	Approved with conditions 18.06.2003
A210418 (householder planning)	Erection of double garage with home office above (Maliks – adjacent)	Approved with conditions 09.06.2021
A220649 (Certificate of lawful use)	C3 dwelling house (Maliks – adjacent)	Certificate granted 21.06.2023
A230574 (listed building consent)	Internal alterations to bedrooms to create an en-suite in each one	Withdrawn 01.09.2023

### Relevant legislation and guidance

The relevant legislation which relates to the historic environment in Wales is set out in the following:

- Historic Environment (Wales) Act 2016;
- Planning (Listed Buildings and Conservation Areas) Act 1990; and
- Ancient Monuments and Archaeological Areas Act 1979.

National planning policy and guidance is set out in:

- Planning Policy Wales Edition 12 (2024)
- Technical Advice Note 24 The Historic Environment

Cadw guidance:

- Conservation Principles for the Sustainable Management of the Historic Environment in Wales, 2001
- Heritage Impact Assessment in Wales, May 2017
- Setting of Historic Assets in Wales, May 2017
- Managing Historic Character in Wales. May 2017
- Managing Change to Listed Buildings in Wales, May 2017
- Managing Easy Access to Listed Buildings in Wales, 2022

Also relevant are:

- Future Wales: The National Plan 2040
- Technical Advice Note 5 Nature Conservation
- Technical Advice Note 12 Design
- Technical Advice Note 15 Development and Flood Risk
- Technical Advice Note 18 Transport

### Local planning policy and guidance

The adopted development plan is the Ceredigion Local Development Plan 2007-2022. The plan should be read as a whole, however the main relevant development plan policies relating to this proposal are:

- Strategic Policy SO1 Sustainable Growth
- Strategic Policy SO4 Development in Linked Settlements and Other Locations
- Strategic Policy SO5 Affordable Housing
- Policy LU02 Requirements regarding all Residential Developments
- Policy LU07 Subdivision of Existing Dwellings

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- Policy LU16 Tourism Accommodation – Types of Accommodation not covered by Policy LU14
- Policy DM06 High Quality Design and Placemaking
- Policy DM10 Design and Landscaping
- Policy DM14 Nature Conservation and Ecological Connectivity
- Policy DM15 Local Biodiversity Conservation
- Policy DM17 General Landscape
- Policy DM18 Special Landscape Areas
- Policy DM19 Historic and Cultural Landscape
- Policy DM20 Protection of Trees, Hedgerows and Windfarms

There is also relevant supplementary planning guidance:

- Built Environment and Design
- Nature Conservation
- Affordable Housing
- Special Landscape Areas

### Initial Assessment of Proposal – Historic Environment

Plas Abermad is a Grade II\* listed building and was listed in 1989 as an exceptionally complete High Victorian Gothic country house by a major architect, retaining particularly high quality interior detail. The list description is very detailed in relation to both the exterior and the interior and is attached to this pre application response. The house retains a significant amount of its fine interior detailing, fixtures and fittings, although its character and appearance has been affected to some degree by the insertion of modern partitions etc assumed to have been installed during the use as a nursing home. Having been empty for a while and clearly suffered from a lack of maintenance, the building is in need of a programme of repair and maintenance, as well as a possible new use, in order to ensure it is preserved for future generations.

The proposal involves the potential creation of 10 separate residential units, and whilst on site during the course of discussions at the time it wasn't certain whether the units would be purely residential or provide holiday accommodation (both options are therefore considered in the policy response).

Whilst the overall principle of converting Plas Abermad into 10 separate units could be acceptable in principle from a listed building perspective, this needs to be done taking into account retention of the original floor plan and historic features and fabric, which are of a high quality and of high significance. The retention of the hierarchy of the rooms also needs to be a consideration.

Overall the proposed divisions do not impact too much on the historic fabric and generally relate to the existing layout without too much subdivision of rooms. A main concern however are the spiral staircases proposed to provide access from high status rooms on the ground floor into the basement. This would significantly impact on the character and appearance of the rooms and an alternative layout or solution needs to be found in relation to this, for example losing one flat and keeping the doorway between these two rooms on the ground floor. Or other options that have less impact on significant parts of the building should be considered, or alternative uses for parts of the basement. It is a general principle that change is more acceptable in less significant areas, provided that the change can be adequately justified in heritage terms.

The alterations proposed in relation to flat one using the existing historic staircase however to create a unit over the two floors would be acceptable, as would reconfiguring the layout in this part of the building on the ground floor and removing later partitions that have been inserted, therefore reinstating part of the original floor plan in this area.

Some previous inappropriate alterations, e.g. addition of later partitions, are proposed for removal which would be beneficial and help to mitigate some of the other changes proposed. The existing external fire escape detracts from the character and appearance of the building, and goes across some windows. Whilst it is recognised that this is already in situ and fire regulations are likely to require its retention, any proposals to improve its appearance would be welcomed.

In terms of building regulations it will be necessary to be able to ensure that any scheme can meet the requirements for fire regulations. This can be problematic in relation to listed buildings, and it is sometimes not possible to find a solution. Early discussions with the Council's building control section is recommended, together with a discussion on how any requirements could impact on the listed building without impacting its detail and fabric. Information in relation to proposed methods of insulation and energy efficiency will also be required, if proposed, however it should be noted that where this would impact on the character and appearance of the listed building it would not be permitted to install these measures.

Some changes to the initial plans submitted were discussed on site that would allow features to be more visible and improve the layout, especially on the attic floor, and these would be a positive change.

All existing historic detail, fixtures and fittings must remain in situ and unaltered by any scheme that comes forward. A room by room schedule and plan showing these should accompany any

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forthcoming listed building application. Any forthcoming application for listed building consent will require detailed plans showing features, floor materials, level changes, etc. It is a general principle that any alterations should be kept to the minimum necessary, and be reversible where possible e.g. new partitions should be cut around cornices etc and this level and type of detail will be required.

Other information that will be required in relation to the listed building relates to the potential division of the outside space and parking, paraphernalia and items such as sheds, services, vents, heating, pipework, and lighting. It is noted that it is proposed to provide parking to the rear of the building and this would ensure that cars are not visible on the main approach to Plas Abermad. Historic mapping shows that there were paths to the rear of the building historically, and any proposals should reflect the historic layout. It would be more appropriate to provide access to the rear of the building on the western side of the house as this is less visible from the main views towards the house and in relation to the higher status elevations. In terms of landscaping, any proposals should reflect and ideally restore the original layout and detail of the garden areas around the house.

### Planning policy

The Council's planning policy section were consulted on the pre application enquiry and have responded in detail. The response accompanies this letter, however the key points are as follows:

- Plas Abermad is in a rural location and is therefore considered as 'other locations' in the Ceredigion Local Development Plan. With regards to housing, Policy S04 Development in Linked Settlements and Other Locations sets out that 'Other Locations' are inappropriate for housing development unless justified on the basis that it meets a demonstrated unmet affordable housing need in the locality or a need for a rural enterprise dwelling in line with Technical Advice Note 6. The proposal implies that any residential accommodation would be open market which would be contrary to LDP Policy S04.
- In 'Other Locations', LDP Policy LU16 Tourism Accommodation – Types of Accommodation not covered by Policy LU14 encourages and supports the conversion of existing buildings to tourist accommodation provided that the buildings are structurally sound and will not require major external alterations. Whilst residential conversions have a minimal impact on the rural economy, conversions for holiday use can contribute more and may reduce pressure to use other houses in the area for holiday use.
- Whilst the change of use to open market housing would be contrary to the LDP, securing and restoring a Grade II\* Listed Building is a material consideration. Therefore, the change of use of Plas Abermad Nursing Home to open market residential accommodation may be considered acceptable in principle providing this is demonstrated to be the only viable option.

- The LPA seeks to negotiate a proportion of 20% affordable housing on all residential developments in accordance with Policy S05 Affordable Housing. Developers seeking to negotiate a reduction in affordable housing provision will need to submit details to show lack of viability for the specific site.
- As the proposal will entail the subdivision of Plas Abermad, any application for planning permission must demonstrate compliance with the criteria in line with Policy LU07 Subdivision of Existing Dwellings of the adopted LDP.
- As Plas Abermad is an existing nursing home, the applicant will be required to submit a report with any application for planning permission justifying the loss or change of use of the facility.
- Open space provision would be required be in the form of 0.042ha of natural amenity green space in accordance with the Open Space Supplementary Planning Guidance.
- Summary - The change of use of Plas Abermad to open market residential accommodation would be contrary to local planning policy. However, as the proposal would secure and refurbish a Grade II\* Listed Building, which is a material consideration, the proposal may be considered appropriate providing this is the only viable option. The preference of the LPA, however, would be for the change of use to holiday accommodation in the first instance or, failing this, the change of use to affordable housing.

### Other matters

Prior to any alterations being commenced, it is always advised that any basic repair and maintenance works required are carried out.

It is likely that a full building recording will be required at a level 3 or 4 in line with the Historic England guidance Understanding Historic Buildings – A Guide to Good Recording Practice 2016 <https://historicengland.org.uk/images-books/publications/understanding-historic-buildings/>

Whilst there is no proposed increase in the footprint of the building, SAB approval will be required of the proposed new parking area surface is 100 sq m or more.

A public right of way runs in close proximity to the east of Plas Abermad.

Details of the proposed foul drainage will be required as part of a forthcoming application for planning permission.

Developers proposing projects comprising 'major development' will need to undertake a statutory pre application consultation (PAC). The definition of 'major development' is set out in Article 2 of

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the Town and Country Planning (Development Management Procedure) (Wales) Order 2012 which states that major development means development involving any one or more of the following:

- (a) the winning and working of minerals or the use of land for mineral-working deposits(2);
- (b) waste development;
- (c) the provision of dwellinghouses where—
  - (i) the number of dwellinghouses to be provided is 10 or more; or
  - (ii) the development is to be carried out on a site having an area of 0.5 hectares or more and it is not known whether the development falls within sub-paragraph (c)(i);
- (d) the provision of a building or buildings where the floor space to be created by the development is 1,000 square metres or more; or
- e) development carried out on a site having an area of 1 hectare or more;

A PAC may therefore be required depending on the number of units, floorspace and / or site area.

### Other material planning considerations

Ecology – some of the works proposed have the potential to impact upon protected species. From the information provided as part of this pre-application enquiry, it is not possible to ascertain the full potential impact at this time. An ecology and / or arboricultural report is likely to be required to accompany any future planning or listed building application, and this will inform the mitigation measures required. A Green Infrastructure Survey will also be required as part of any planning application.

Tree preservation order (TPO) – the application site is covered by a TPO so any works to trees, or that might affect trees, will require the appropriate consent.

Use class - the current use of the building is that of a nursing home. Planning consent will be required for a change of use to a residential use.

The Council's Highways department has been consulted on the pre application enquiry but no response has been received as yet. It will be forwarded on once it has been received.

### Conclusion

In planning policy terms, the change of use of Plas Abermad to open market residential accommodation would be contrary to local planning policy. However, as the proposal would secure

and refurbish a Grade II\* Listed Building, which is a material consideration, the proposal may be considered appropriate providing this is the only viable option. The preference of the LPA, however, would be for the change of use to holiday accommodation in the first instance or, failing this, the change of use to affordable housing. Therefore any proposal for open market housing will need to be fully justified, as will the loss of the nursing home facility. In addition to this, a viability report will need to be submitted if it is considered that the scheme could not provide an affordable housing contribution.

In terms of the impact upon the listed building, in principle the proposal could be acceptable however the installation of the spiral staircases needs to be reconsidered and other options looked at that would have less of a detrimental impact on the significance of this Grade II\* listed building. A considerable amount of detail will need to accompany an application for listed building consent as set out above.

### Guidance on submitting an application

Guidance on the information required for full planning or listed building applications can be found on the Ceredigion County Council website at:

[www.ceredigion.gov.uk/resident/planning-building-control-and-sustainable-drainage-body-sab/planning-building-control/application-forms/](http://www.ceredigion.gov.uk/resident/planning-building-control-and-sustainable-drainage-body-sab/planning-building-control/application-forms/)

Cadw guidance on Heritage Impact Assessments and Managing Change to Listed Buildings in Wales can be found at <https://cadw.gov.wales/advice-support/placemaking/heritage-impact-assessment/heritage-impact-assessment> and <https://cadw.gov.wales/advice-support/historic-assets/listed-buildings/managing-change-to-listed-buildings> respectively.

Please note that these are the views of the individual officer and are made without prejudice to any future application/s.

**The protection afforded to Listed Buildings both the interior and exterior of the building, as well as any curtilage structures. Any unauthorised works to a listed building constitute a criminal offence, and the Council will take appropriate action if works are carried out without listed building consent having first been obtained.**

I would be happy to discuss any proposed revisions to the scheme if required.