

Tanya Meerally

From: [REDACTED]
Sent: 11 October 2022 17:23
To: CynllunioPlanning
Subject: Objection to Planning Application 0/50004 Kinmel Park

This Message Is From an External Sender

This message came from outside your organization.

Thank you for consulting me about this application.

My objections remain substantively the same as for the previous version of this proposal for a camping development inside the Grade II* Registered Park and Garden of Kinmel Hall and within the curtilage of the Grade I Listed Buildings. It is clear that the proposal is not in keeping with the character of these historic assets. I note that no heritage impact assessment has been added to the available details to justify the application.

I write as a professional consultant in Welsh heritage management, a former Secretary of the Royal Commission on the Ancient and Historical Monuments of Wales and a former Director of Collections and Research at the National Museum Wales. Although I am on the Board of Cadw, I am writing in a private capacity.

I will not address all of the issues raised by the proposals, as I am sure your authority is received numerous representations, but will comment on the significance of the site and the detrimental aspects of the proposals.

Although the proposals are for temporary use, it is important that they are nevertheless evaluated fully. Temporary uses frequently cause a range of detriments to the significance of heritage assets and may in due course lead to longer-term developments.

The Registered park and garden of Kinmel Park is graded II*, placing it among the highest rank of Welsh parks and gardens. A properly researched Statement of Significance would be likely to detail high heritage values: evidential value (the archaeological understanding of an outstanding garden through time from the seventeenth century to the twentieth), historical value (the illustration of the colossal wealth produced from Welsh industry and the design aspirations of the period), aesthetic value (the exceptional quality of the extensive landscaped and planted grounds and the designed gardens, created specifically to form a setting for Kinmel Hall) and communal value (the importance of the site to the local community over generations and its beneficial uses). The curtilage and setting of a Grade I Listed Building (the very top rank of historic buildings in the country) is also a material issue for the development: the proposals appear to be visually intrusive and unsympathetic.

It is clear that a permanent development of the kind described would be completely unacceptable in such a sensitive location where it would be damaging to each of the four heritage values recognised by the Welsh Government in conservation planning: evidential, historical, aesthetic and communal. While some exceptions might be made for a temporary or permanent development if it were realistically to constitute 'enabling development' that would rescue a Grade I Listed Building at Risk, there are no grounds to believe that this proposal in its present location would offer any material benefit to the heritage assets. On the other hand there are ample grounds to believe that they would be detrimental.

While the current proposal is highly problematic, I hope Conwy County Borough Council will work closely with relevant agencies, community groups and owners to develop a forward plan for the site that would enable both the Listed Buildings and the Registered Park to be cared for and enhanced in the long term. The recent change of ownership is a key moment for all concerned to be proactive and mutually supportive.

Yours faithfully

Peter Wakelin

DR PETER WAKELIN

writer • consultant • curator

Tŷ ISAF • LLANILAR • ABERYSTWYTH • SY23 4NP • UNITED KINGDOM



Tanya Meerally

From: Neil Bayliss [REDACTED]
Sent: 07 September 2022 13:01
To: CynllunioPlanning
Subject: FAO: Ruth Evans RE: 0/50004 at Kinmel Hall Kinmel Park

Good afternoon,

Regarding 0/50004 at Kinmel Hall Kinmel Park

Having consulted the information held within the Historic Environment Record I can confirm that there are no archaeological implications for the application.

Kind regards,

Neil Bayliss

Mr Neil Bayliss BA, PCIfA
Swyddog Rheoli Datblygiad / Development Control Archaeologist
Ymddiriedolaeth Archaeolegol Clwyd-Powys / Clwyd-Powys Archaeological Trust

[REDACTED]

Ymddiriedolaeth Archaeolegol Clwyd-Powys, Y Swyddfeydd, Coed y Dinas, Y Trallwng, SY21 8RP.
Swyddfa Gofrestredig fel yr uchod. Rhif Cwmni 1212455, Rhif Elusen 508301, Sefydliad Cofrestredig CIfA.

Clwyd-Powys Archaeological Trust, The Offices, Coed y Dinas, Welshpool, SY21 8RP.
Registered Office as above. Company No 1212455, Charity No 508301. Chartered Institute for Archaeologists Registered Organisation

[Privacy Notice](#)

Planning
Conwy County Borough Council

Sent by email

Eich cyfeirnod
Your reference

0/50004

Ein cyfeirnod
Our reference

Dyddiad
Date

26 September 2022

Llinell uniongyrchol
Direct line

0300 025 6007

Ebost
Email:

cadwplanning@gov.wales

Dear Sir / Madam,

Siting of 16 camping pods, Kinmel Park, Kinmel Hall, Primrose Hill, St George, Conwy

Thank you for your letter inviting our comments on the information submitted for the above planning application.

Advice

We consider that the application is inadequately documented and we recommend that additional information is required to enable a balanced decision to be taken against Planning Policy Wales, Technical Advice Note 24 Historic Environment and associated guidance. Full details of the additional information that is required are explained in the below assessment.

The national policy and Cadw's role in planning are set out in Annex A.

Assessment

FL186 First World War Practice Trenches at Bodelwyddan Park

DE186 St George's Well, Abergele

Located within a 2km search buffer of the application area are the above designated historic assets.

Intervening topography, buildings and vegetation mean it is unlikely that the proposal will be inter-visible with the scheduled monument. Therefore, it is unlikely that there will be any effect on the setting of the scheduled monument.

PGW(Gd)54(CON) Kinmel Park

This application is for the siting of 16 camping pods with compost toilet and washing facilities (for a period of six years) within the grade II* registered historic park and garden at Kinmel Park. It is clear that the proposed development is not in keeping with the character of the registered historic park and garden and will have a significant adverse impact on the registered park and garden.

The application form submitted for this application states that a Planning and Heritage Statement has been submitted in support of this application: However, this document is not included on the application's website. Without being able to consider the information in this document it is impossible for Cadw to determine if the questions that were raised in regard to the previous (withdrawn) application of this development have been answered and if the current proposals will provide sufficient public benefit to outweigh the significant adverse impact on the registered historic park and garden. Consequently, Cadw are not currently in a position to provide advice on this material consideration in the determination of the current application until a copy of the Planning and Heritage Statement has been made available for public consideration.

Yours sincerely,

Nichola Davies
Casework Manager

Annex A

Our role

Our statutory role in the planning process is to provide the local planning authority with an assessment concerned with the likely impact that the proposal will have on scheduled monuments, registered historic parks and gardens, registered historic landscapes where an Environmental Impact Assessment is required and development likely to have an impact on the outstanding universal value of a World Heritage Site. We do not provide an assessment of the likely impact of the development on listed buildings or conservation areas, as these are matters for the local authority.

It is for the local planning authority to weigh our assessment against all the other material considerations in determining whether to approve planning permission.

National Policy

Applications for planning permission are considered in light of the Welsh Government's land use planning policy and guidance contained in Planning Policy Wales (PPW), Technical Advice Notes and related guidance.

PPW [planning-policy-wales-edition-11.pdf](#) explains that it is important that the planning system looks to protect, conserve and enhance the significance of historic assets. This will include consideration of the setting of an historic asset which might extend beyond its curtilage. Any change that impacts on an historic asset or its setting should be managed in a sensitive and sustainable way.

The conservation of archaeological remains and their settings is a material consideration in determining a planning application, whether those remains are a scheduled monument or not. Where nationally important archaeological remains are likely to be affected by proposed development, there should be a presumption in favour of their physical protection in situ. It will only be in exceptional circumstances that planning permission will be granted if development would result in a direct adverse impact on a scheduled monument (or an archaeological site shown to be of national importance)

[Technical Advice Note 24: The Historic Environment](#) elaborates by explaining that when considering development proposals that affect scheduled monuments or other nationally important archaeological remains, there should be a presumption in favour of their physical preservation in situ, i.e. a presumption against proposals which would involve significant alteration or cause damage, or would have a significant adverse impact causing harm within the setting of the remains.

Historic Parks and Gardens

PPW also explains that local authorities should value, protect, conserve and enhance the special interests of parks and gardens and their settings included on the register of historic parks and gardens in Wales and that the effect of a proposed development on

a registered park or garden or its setting should be a material consideration in the determination of a planning application.

Tanya Meerally

From: [REDACTED]
Sent: 17 September 2022 21:15
To: CynllunioPlanning
Subject: Planning Application 0/50004

This Message Is From an External Sender

This message came from outside your organization.

17th September 2022

Dear Sir or Madam,

We write to you in connection with the above Planning Application for the proposed operation of a camp site and compost toilet within the grounds of Kinnel Park, St George LL22 9DA.

Please accept this e-mail as our objection to the above application for the following reasons:

1. Kinnel Hall is designated as a Grade 1 Listed Building and the adjoining gardens are even listed as Grade 2 and are surely listed for a reason namely to protect them from inappropriate developments.
2. The proposed operation would only have a negative impact on the character of the Hall and the surrounding gardens and nearby residential properties.
3. The applicant has previously erected six camping pods without the necessary planning permission and we have already heard of the effect it had on the neighbouring residents and their peaceful existence.
4. The operation of such a campsite would inevitably cause an increase in traffic over a very narrow access road which serves the Hall and the other residential properties within the Park. In addition, there is a Primary School situated very near to the entrance to the Park which would be negatively impacted.
5. We are aware that the Hall itself continues to be in a poor condition structurally and therefore could be hazardous to families camping in the adjoining gardens..
6. We still cannot see how this proposed camp site would help in the restoration or conservation of such a property of such historic significance.

In the circumstances, we respectfully request that the application be refused.

Your faithfully,
Bryn and Hefina Hughes,
11 Bryn Derwen,
Abergele.
LL22 8DE.

Andrew Sumner, Cilan Uchaf, Llanfair Dyffryn Clwyd, Ruthin, Denbighshire LL15 2SN

Conwy County Borough Council
Development Management
PO Box 1
CONWY
LL30 9GN

10th October 2022

Dear Sir or Madam

Application Number 0/50004

Planning Application for the siting of 16 camping pods and composting toilet for a temporary period of time (6 years) in the gardens of Kinmel Hall

I am writing to present my observations and objection in relation to the above planning application. I concentrate on two aspects of the historic property at Kinmel: biodiversity and heritage. I understand that the current planning application is a resubmission of a previous one which was found to be insufficient and lacking supporting information. The current application, having been submitted on the 7th September 2022 is required to address new legislative requirements as well as national and local policy that have come into force since the original submission. Specifically, this means that the Environment (Wales) Act 2016 and the Historic Environment (Wales) Act 2016.

Biodiversity

The Environment (Wales) Act 2016 (the Act) Section 6 introduced an enhanced biodiversity and resilience of ecosystems duty for public authorities (PAs) in the exercise of functions in relation to Wales. The Section 6 duty requires that public authorities '*must seek to maintain and enhance biodiversity so far as consistent with the proper exercise of their functions and in so doing promote the resilience of ecosystems*'. To comply with the S6 duty public authorities should embed the consideration of biodiversity and ecosystems into their early thinking and business planning, including any policies, plans, programmes and projects, as well as their day-to-day activities.

Biodiversity Net Gain

In this context I ask the planning authority to ensure that the mandatory requirement to enhance biodiversity (biodiversity Net Gain) is taken into consideration in their decision in relation to the Kinmel application. I am not aware of any biodiversity measures or enhancements included within the planning application for Glamping Pods at Kinmel Hall. However, I do know that areas of shrubs and possible trees too, have been felled in the area where the glamping pods are to be sited.

Protected Species at Kinmel

Ecologists and other visiting Kinmel Hall in the past have previously noted the presence of bats. An ecological appraisal by EcoScope in May 2022 included a single night of bat transect survey by three ecologists using bat detectors. The report acknowledges that five species of bats were present in large numbers flying through the gardens and wooded backdrop to the south of the hall. These

included lesser horseshoe bats and a single record of a greater horseshoe bat. The latter is very unusual in North Wales.

Whilst the single walkover and bat transect has been completed, a complete suite of surveys should have been undertaken

over 12 months of visits to identify the species of bats, the size of the population, where they are roosting at different times of the year. No attempt has been made to survey the populations of bats using the hall. Nor has any work been completed to determine the status of the roost. It is very likely that the cellars of the Hall are a maternity and hibernation roost. Lesser and Greater horseshoe bats will make use of established vegetation as flightlines in an out of the hall.

Disturbance of the vegetation, lighting as well as noise at night, which will result from use of the grounds for camping and glamping will have an adverse effect on the species.

I do not believe that the current surveys are adequate to determine the planning application, nor for the application to apply for a derogation licence to do work in the vicinity of the hall that would affect the resident bat population.

All bats are UK protected species and are also listed in Appendix 2 of the Environment Act – Section 7. A roost of lesser horseshoe bats *Rhinolophus hipposideros* have been recorded in the cellar of the hall quite recently and there is a long history of bats being present in the Hall. I am not aware that any surveys have been undertaken to verify the status of the roost (maternity, hibernation or other). Other species of bats are also likely to be present. There is anecdotal evidence that bats have been seen flying through the building and species other than lesser horseshoe bats are likely to be roosting within the above ground floor and roofs spaces of the hall. Bats, and in particular lesser Horseshoe bats fly along hedges, scrub and woodland as they forage. Removal of trees and shrubs would materially and adversely affect the foraging behaviour of these bats.

Technical Advice Notes

I remind the Planning Authority to take into consideration the content of Technical Advice Notes (TANs) in relation to biodiversity and the national policy in relation to biodiversity as set out in Planning Policy Wales Edition 11.

CCBC Biodiversity Policies

The Planning Authority should make the applicant aware of the following CCBC policies on biodiversity and of the duties that CCBC have to protect biodiversity and the need for the applicant to provide information with the application:

LDP5-Biodiversity and Policy NTE/3 Biodiversity: 1. New development should aim to conserve and, where possible, enhance biodiversity. 2. All proposals should include a Biodiversity Statement detailing the extent to impact on biodiversity. 3. The Council will refuse proposals which would have a negative impact on a European Site, protected or priority species or habitat unless the impact is adequately mitigated, and appropriate remediation and enhancement measures are proposed and secured by planning conditions or obligations. Section 5 of the LDP5 sets out how biodiversity should be protected, mitigated and enhanced. Section 6 of the LDP5 sets out the requirements of a Biodiversity Statement.

Heritage

Historic Environment (Wales) Act 2016 requires changes in the manner in which heritage is to be protected and conserved through the controls on development through the planning process. There are four key areas of relevance to the proposed development at Kinmel. These are set out below.

Setting of Historic Assets in Wales explains what setting is, how it contributes to the significance of a historic asset and why it is important. It also outlines the principles used to assess the potential impact of development or land management proposals within the settings of World Heritage Sites, ancient monuments (scheduled and unscheduled), listed buildings, registered historic parks and gardens, and conservation areas. Note that 'Setting', as it applies to Listed Buildings, is now also to be applied to Registered Parks and Gardens. In the case of Kinmel the setting is the entire former parkland which is included within the site registration.

Managing Change to Registered Historic Parks and Gardens in Wales sets out general principles to follow when considering changes that may have an impact on registered historic parks and gardens. It explains the status of the register of historic parks and gardens in Wales and its place in the planning system, including the roles and responsibilities of owners, local planning authorities, amenity societies and the Welsh Government's Historic Environment Service (Cadw). Although the register is statutory, registration does not introduce any new consent regimes. We understand that Cadw have registered their concern about the proposed development at Kinmel. As the statutory consultee for heritage Cadw's concerns are a material consideration.

Managing Change to Listed Buildings in Wales sets out general principles to consider when making changes to listed buildings and explains the roles and responsibilities of owners, local planning authorities and the Welsh Government's Historic Environment Service (Cadw). Change within the setting or curtilage of a Listed building must be considered as important as changes to the building. Listed Kinmel Hall sits within grounds that contain numerous other listed buildings and as a result there are complex and overlapping settings/curtilages that make consideration of the proposed development highly complex. Any approved development that affects these listed buildings or their curtilages will set a precedent that will only progress to further and more damaging development. This is particularly relevant where the applicant has tried to minimise concerns about the development by proposing a 5 year limit on the life of the development. My concern is that at the end of 5 years an extension would be applied for, or the development would continue in defiance of the planning authority.

Heritage Impact Assessment

I remind the planning authority that a full Heritage Impact Assessment (HIA) is required for the proposed development which should consider the listed buildings, their curtilages, the Registered Parks and Gardens and their setting and should clearly demonstrate that there would be no adverse effects on the designated sites.

CCBC Heritage policies

I note that CCBC LDP Strategic Policy CTH/1 commits the council to protecting and enhancing heritage assets and specifically there must be no significant effects on heritage sites. Proving there are no significant effects would be the purpose of a detailed HIA. CTH/2 requires heritage assets to preserve or enhance heritage assets. I cannot see how glamping pods can be considered to have no significant effect on the heritage asset.

Enabling Development

Policy CTH/4 Enabling Development must make a significant positive contribution to the character of a heritage site and will only be permitted where it meets certain criteria.

- a. It will not materially harm the heritage values of the historic asset or its setting and;
- b. It avoids detrimental fragmentation or management of the historic asset; and
- c. It will secure the long-term future of the historic asset and, where applicable, its continued use for a sympathetic purpose and;
- d. It is necessary to resolve problems arising from the circumstances of the present owner, or the purchase price paid and;
- e. Sufficient subsidy is not available from any other source and;
- f. It is demonstrated that the amount of enabling development is the minimum necessary to secure the future of the historic asset, and that its form minimizes harm to other public interests and;
- g. The public benefit of securing the future of the historic asset through such enabling development decisively outweighs the disbenefits of breaching other public policies.

I ask the planning committee to carefully consider whether a group of Glamping pods, alone, would:

- provide sufficient benefit to secure the long-term future of the historic asset and, where applicable, its continued use for a sympathetic purpose?
- Provide sufficient income to secure the future of the historic asset?
- Avoid detrimental fragmentation of the buildings and grounds at Kinmel?

In my opinion it is hard to see how a scheme of proposed glamping pods located in the overlapping curtilage of Listed Buildings and in a Registered Park and Garden can be considered as permissible Enabling Development.

I trust that the now registered application does contain all the necessary supporting information in adequate detail for the Planning Authority to make an informed decision in accordance with the duties set out in legislation, regulation and policy.

I respectfully request that my points and objection are taken into consideration in the planning authority's deliberations.

Yours faithfully

A large black rectangular redaction box covering the signature area.

Andrew Sumner CMLI

Tanya Meerally

From: Andrew Sumner [REDACTED]
Sent: 10 October 2022 10:21
To: CynllunioPlanning
Subject: Planning Application 0/50004 at Kinmel Hall
Attachments: 20221010 Letter of objection.docx

Good morning please find the attached letter of objection to the planning application for glamping pods and a composting toilet at Kinmel Hall.

Regards

Andrew Sumner

Tanya Meerally

From: Alison Richards [REDACTED]
Sent: 03 October 2022 21:27
To: CynllunioPlanning
Subject: Re: Notice of Application for Planning Permission 0/50004 MR C Cryer 298099

This Message Is From an External Sender

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Of course Gemma.
Alison Richards,
Highfield
20 The Grove, Merthyr Tydfil CF47 8YR

On Mon, 3 Oct 2022 at 12:23, CynllunioPlanning <CynllunioPlanning@conwy.gov.uk> wrote:

Good afternoon

Thank you for your email below. In order for me to register and acknowledge your representation we require your full postal address, can you please provide these details.

Many thanks

Gemma

From: Alison Richards [REDACTED]
Sent: 01 October 2022 07:52
To: CynllunioPlanning <CynllunioPlanning@conwy.gov.uk>
Subject: Notice of Application for Planning Permission 0/50004 MR C Cryer 298099

Dear Paula,

I was at Kimmel Hall Clarendon School for Girls for 8 years! In that time I became very well acquainted with the building. I took my family to a conference there in 1986.

I remember the broad walk as a place of mystery and intrigue: ancient trees, very old rhododendrons and a daffodil fairy ring. (I learned later it was an ancient thoroughfare and probably part of a Roman road).

My objection to the glamping pods is that they have been positioned with little thought given to the history of the house and gardens. I know they are already in place because I've seen photos!

They must be moved!

The Hall is in a sorry state and must be made water tight at the very least.

What ever Mr Cryer has planned for the Hall he needs financial support and goodwill.

All interested parties including architects, Friends of Kinmel Hall, Conwy Council and the present owner should pool their resources and come up with a plan that sets out the Hall's future in the light of its History.

Yours sincerely

Alison Richards

Notice of Application for Planning Permission

0/50004

MR C Cryer

298099 Northing: 374913

Siting of 16 camping pods and compost toilet for a temporary period of time (6 years)

Kinmel Park, Kinmel Hall, Primrose Hill, St George, LL22 9DA

Rydym yn croesawu gohebiaeth yn y Gymraeg a'r Saesneg fel ei gilydd. Ni fydd gohebiaeth yn yr un iaith na'r llall yn arwain at unrhyw oedi.

Mae'r neges e-bost hon ac unrhyw ymgysylltiadau yn gyfrinachol, ac wedi eu bwriadu ar gyfer yr un sy'n cael ei h/enwi yn unig. Gallent gynnwys gwybodaeth freintiedig. Ar gyfer yr amodau llawn ynglŷn â chynnwys a defnyddio'r neges e-bost hon ac unrhyw atodiadau, gweler www.conwy.gov.uk/ebost_ymwadiad

We welcome correspondence in both Welsh and English. We will respond to correspondence in either language without delay.

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Planning Applications To Consider 13th October 2022

Ref	Description	Location	Observation
0/50002	Temporary use (4 years) of land as car sales pitch to include office/cabin and part removal of site boundary wall (to Kinmel Avenue) and erection of metal fence.	Abergele Cars, Kinmel Avenue, Abergele, LL22 7LW	Concerns over the following: 1) Metal fence not in keeping with the area. 2) Parking Conditions not being met. 3) Timeframe raised – use of ‘temporary’ being 4 years. 4) Parking on yellow lines/road.
0/50004	Siting of 16 camping pods and compost toilet for a temporary period of time (6 years)	Kinmel Park, Kinmel Hall, Primrose Hill, St George, LL22 9DA	Concerns of the following: 1) Again timeframe & definition of ‘temporary’ being 6 years. 2) Location is a historical house & gardens.
0/50009	Variation of condition 2 of planning approval 0/21384 (Continued Use of Land as a Caravan Site Without Compliance with Condition 1 of Planning Permission Granted Under Code Ref: 5/2115) to allow all year round occupation of caravans for holiday purposes	Morawel, Harts Caravan Park, Marine Road, Pensam, Abergele, LL22 7RB	None
0/50031	Replacement of 12 touring caravans with 8 static caravans currently permitted at Ty Gwyn Caravan Park, together with associated works	Ty Gwyn Chalet And Caravan Park, Towyn Road, Towyn, LL22 9HA	None
0/50073	Erection of extension to the side	34 Lon Glanfor, Belgrano, Abergele, LL22 9YQ	None

Tanya Meerally

From: ATC Info
Sent: 14 October 2022 15:19
To: CynllunioPlanning
Subject: Planning Application Observations October 2022
Attachments: Planning Apps 2022-10 October.pdf

Importance: High

Good afternoon,

Please find attached Observations following our meeting last night.

Many thanks &

Kind regards,

Fiona

Fiona Taggart

Clerc Cynorthwyol y Dref/ Assistant Town Clerk
Cyngor Tref Abergele / Abergele Town Council

"Mae'r e-bost hwn ac unrhyw atodiadau iddo yn gyfrinachol ac wedi eu bwriadu i sylw'r derbynnydd a enwir yn unig. Gallai'r neges fod yn cynnwys gwybodaeth freintiedig. Os yw wedi eich cyrraedd ar ddamwain, ni ddylech ei gopïo, na'i ddosbarthu neu ddangos y cynnwys i unrhyw un, yn hytrach dylech gysylltu â'r sawl a'i danfonodd ar unwaith. Nid yw Cyngor Tref Abergele na'r sawl sy'n anfon yr e-bost yn derbyn cyfrifoldeb am unrhyw frysau, a'ch cyfrifoldeb chi yw sganio pob atodiad."

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 Lleihau Ailddefnyddio Ailgylchu ✓ Reduce Re-use Recycle 

Julia Anne Jones

From: catrin [REDACTED]
Sent: 14 September 2022 18:27
To: CynllunioPlanning
Subject: Cais Rhif / Application No: 0/50004

Importance: High

Follow Up Flag: Follow up
Flag Status: Completed

Dear Sirs,

We write in connection with the above Planning Application pertaining to proposals for change of land use for the purpose of operating a camp site within the grounds of Kinnel Hall, Kinnel Park, St George LL22 9DA.

Please accept this e-mail correspondence as our objection to the above application for the reasons set out below:

1. As a matter of principle, the application is ill-thought out and entirely inappropriate having regard to the character and historical significance of what is, after all, a Grade 1 listed property located within Grade 2 listed grounds;
2. It is clear that the proposed development would result in an interference with the peaceful enjoyment of those who reside in properties in and around the Kinnel Park Estate. I understand that residents have reported incidents of those using the campsite (which was opened by the applicants without the requisite permissions) looking in to the home and garden of those occupying one of the properties situated adjacent to the Kinnel Hall grounds;
3. The operation of a campsite at this location will inevitably result in noise, traffic and general disturbance to what has been a peaceful scenic location of historic significance and will add nothing of value to the location;
4. The operation of this facility will serve to diminish the character of the Hall and gardens, the surrounding area and properties;
5. The proposal will cause an increase in vehicular traffic over a narrow approach which serves not just the Hall but also properties located within the estate raising obvious environmental and safety concerns;
6. Additional environmental factors are the impact upon existing flora and fauna. We have already noted the impact of last year's visitors to the site on flowering plants within the grounds of the hall;
7. We fail to see how the proposal is intended to facilitate the conservation of the Hall and its' grounds. We have been unable to identify any form of business plan to address the owners' intentions concerning restoration and maintenance of the Hall and grounds.

In the circumstances, we respectfully request that the above application be refused.

Yours faithfully,

Paul McAlinden & Catrin McAlinden

Y Bryn, Rhyd-Y-Foel, Abergele, Conwy LL22 8DY.

Julia Anne Jones

From: Shaw Holly <Holly.Shaw@struttandparker.com>
Sent: 14 September 2022 16:56
To: CynllunioPlanning
Subject: Objection From The Kinmel Estate on Planning Application 0/50004

This Message Is From an External Sender

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Dear Sir/Madam

Kinmel Hall, Kinmel Park, Primrose Hill, St George, LL22 9DA

The Kinmel Estate is the neighbouring land owner to Kinmel Hall, owning the parkland and the properties around Kinmel Hall.

The Estate objects to this application due to the proposed siting of the glamping pods. The proposed plans will create an immediate loss of privacy for Hamilton House as the pods are to be sited near to the boundary of the property. This will also have an effect on noise levels, causing disturbance to Hamilton House in particular. The glamping pods will also cause a loss of visual amenity for local residents as the design is not felt to be in keeping with the natural surroundings of the historic gardens or the architectural style of Kinmel Hall.

The design, appearance and materials put forward are also felt to have a negative effect on the listed building Kinmel Hall and also the surrounding parkland as the pods are not in keeping with the character of the area nor are they felt to have been sympathetically designed.

Yours faithfully

Holly Shaw

Holly Shaw BSc (Hons)

Graduate Surveyor
Rural North West
Direct line: **01244 354 870**
Mobile: 07443 316154

**CONWY COUNTY BOROUGH
COUNCIL
DEVELOPMENT CONTROL**

RECEIVED: 14/09/2022

APPLICATION NO: 0/50004

Strutt & Parker, Park House, 37 Lower Bridge Street,
Chester CH1 1RS
Office: 01244 354888

Strutt & Parker, Theatre Royal, 14 Shoplatch, Shrewsbury,
Shropshire, SY1 1HR
Office: 01743 284200 (option 3)

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For further details of Strutt & Parker please visit our web site

Subject: FW: 0/50004 Kinmel Hall Pods

From: Kate Surry <kate.surry@conwy.gov.uk>

Sent: 29 September 2022 19:23

To: Ruth Haf Evans <ruth.haf.evans@conwy.gov.uk>

Subject: 0/50004 Kinmel Hall Pods

Hi Ruth

I have the following comments with regard to this application:

1. The bat activity transect survey carried out as part of the *Preliminary Ecological Assessment (PEA)*, *EcoScope 10th May 2022* recorded heavy use of the woodland within the application area by 4 species of bat **indicative of a significant roost in the vicinity**. The walkover transect however gives no indication of the location of roost (s) in relation to the application area and flight lines being used by bats to access roost(s) and foraging areas. The PEA simply records bats detected at a given location on the walkover transect at a given moment in time. To properly assess the impacts of the proposal on protected species I recommend a comprehensive bat roost and emergence survey is carried out and submitted to the LPA by experienced and licenced professional bat ecologists aligned with [Bat Surveys for Professional Ecologists: Good Practice Guidelines 3rd edition - Guidance for professionals - Bat Conservation Trust](#) to locate roost(s), record emergence/ re-entry activity and flight lines across the application area. It is possible that both hibernation and summer roosts occur adjacent, within or possibly beneath the application area given the complexity of the built environment within Kinmel Hall, historic parkland, gardens and the wider estate. If this is the case maintaining linkages between these will be crucial for the long-term conservation status of the bat species using the site. A completed survey report will assess the full impact of the proposals and all associated measures (see below) on any roosts recorded and provide a detailed bat conservation plan.
2. The proposal for siting pods as submitted is very skeletal showing simply the location and specification of the proposed pods and compost toilet. There is no assessment of impact on root protection zones, indicative tree works, detail of vegetation clearance, ground works, lighting or access provision provided with the majority of glamping site applications. All these ancillary measures have the potential to impact protected species. If these associated measures or any others are proposed I recommend details be submitted and included within all associated protected species assessments.
3. The southern end of the application area is mapped as Restored Ancient Woodland and under national planning policy requires conservation/restoration as such. No assessment of the impacts of the proposals on this area have been included in the PEA. It is not clear for example how many pods are planned within this area and whether vegetation clearance has occurred here. I recommend proposals that ensure no adverse impacts to this area and plans as to how it will be successfully managed or restored to ancient woodland will be achieved in the long-term are submitted with the application.
4. No biodiversity enhancements have been submitted with this application. I recommend such enhancements are included within the scope of ecological reports recommended above and serve to support the protected species using the site and the unimproved acid grassland and woodland habitats it supports.

Kind regards

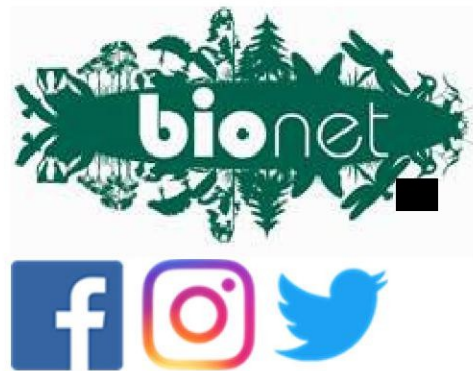
Kate

Kate Surry
Ecolegydd / Ecologist
Yr Amgylchedd, Ffyrdd a Chyfleusterau / Environment, Roads and Facilities
Cyngor Bwrdeistref Siriol CONWY County Borough Council

E-bost / E-mail: kate.surry@conwy.gov.uk
Tel: 01492 575106

Normal Working Days :Monday,Thursday, Friday

www.conwy.gov.uk/cefnngwlad
www.conwy.gov.uk/countryside



Tanya Meerally

From: [REDACTED]
Sent: 19 September 2022 20:06
To: CynllunioPlanning
Subject: Cais Rhif / Application No: 0/50004

This Message Is From an External Sender

This message came from outside your organization.

To whom it may concern

color:#333333">

color:#333333">With reference to the above please register our objection to the above proposed planning application.

color:#333333">

color:#333333">1. Kinmel Hall is a Grade 1 listed building with the gardens being Grade 2* and such a development would undoubtedly encroach/damage such an important historic building and gardens.

color:#333333">2. The planning application for the siting of these camping pods is not in keeping with the character of the local area.

color:#333333">3. The road leading to Kinmel Hall is a single track lane which is not suitable for heavy traffic use and certain not suitable for holiday traffic to and from 16 camping pods.

color:#333333">4. The increase in noise/traffic/disturbance would significantly impact the residents within the grounds of Kinmel Hall and would greatly affect their quality of life.

color:#333333">5. The local school is very close to the main entrance to the Hall and additional traffic will undoubtedly cause additional health and safety risks when pupils are entering and exiting the school as this basically a single lane road.

color:#333333">6. The pods have been already been used without planning consent and have already caused distress to residents and damage to the area where they are sited.

color:#333333">7. With the millions of pounds of investment that is needed to bring the Hall to a habitable condition I don't see how the sighting of sixteen camping pods will help. After the purchase of the pods, toilet facilities and all other associated costs, is it really a viable option.

8. I do not feel that 6 years represents temporary planning consent. To my mind temporary is a period of less than 1 year.

I do not see how this application differs from the last notice submitted to the Council (and subsequently withdrawn) apart from the siting of the pods being moved to a different area of hall grounds. All other proposals seem to be as previously submitted and therefore all previous objections stand.

Yours sincerely

Jason & Angharad Jones
Arwendon, Groes Lwyd, Abergele, LL22 7TA
color:#333333">3 March 2022

MEMO

At / To	Development and Building Control Manager Regulatory Services
Copi / Copy To	
Oddi Wrth / From	Head of Service Environment, Roads & Facilities
Ffôn / Tel	01492 57 5438
E-Bost / E-Mail	iwan.ellis@conwy.gov.uk
Fy Nghyf / My Ref	0/50004
Eich Cyf / Your Ref	
Dyddiad / Date	25 th September 2022

**CONWY COUNTY BOROUGH
COUNCIL
DEVELOPMENT CONTROL**
RECEIVED: 29.09.2022
APPLICATION NO: 0/50004

Application No. 0/50004

Siting of 16 camping pods and compost toilet for a temporary period of time (five years)
Kinmel Park, Kinmel Hall, Primrose Hill, St George LL22 9DA

We refer to the above application and would inform you that we would reiterate our previous comments and conditions to the previous application 0/49367, which was the same application as above.

Could you please provide the applicant with the following informatives:

- The applicant should note that planning permission does not constitute permission under the Highways Act for various activities that may be associated with the development i.e. use of the highway/footway to, for example, deposit material, deposit skips, erect scaffolding, any excavation within the highway or the provision of traffic management. Such activities will require the separate consent of the Highway Authority for which you should contact the Streetworks Manager on 01492 575426.
- It is an offence** to allow mud, stones, soil, rubbish or other matter to fall, be carried, or washed onto a highway. The applicant should ensure that positive preventative measures are provided within the curtilage of the site/property and is responsible for making arrangements for surface water drainage to be intercepted and disposed of separately so that it does not discharge from or onto the highway. These measures shall thereafter be suitably maintained. Failure regarding the above may result in the Highway Authority serving legal notice.

For or on behalf of

Andrew Wilkinson

Pennaeth Gwasanaethau Cymdogol/Head of Neighbourhood Services

Tanya Meerally

From: CynllunioPlanning
To: Ruth Haf Evans
Subject: FW: Cyfeirnod / Reference: 0/50004

From: Gareth Roberts <gareth.roberts2@conwy.gov.uk>
Sent: 26 September 2022 14:29
To: CynllunioPlanning <CynllunioPlanning@conwy.gov.uk>
Subject: RE: Cyfeirnod / Reference: 0/50004

Hi Ruth,

Thank you for consulting with me in regards to the proposed siting of No.16 camping pods at Kinmel Hall. The pods are to be located within the Registered Historic Park and Garden of the grade I listed Kinmel Hall. My comments are largely the same as submitted in February, which have been reproduced and amended below for convenience.

The camping pods were previously sited within the more formal Venetian Garden at Kinmel without consent. The original siting of the pods were wholly inappropriate and adversely impacted the significance of both the RHPG and the setting of the hall itself.

The proposed new site layout is aimed as a compromise. The pods are to be situated in a less sensitive part of the grounds, mostly screened from view from the Hall. The income from the pods is to be used to fund the continued emergency repairs of the roof at Kinmel. The application is for temporary permission (6 years). The siting of pods within an important heritage designation such as at Kinmel would usually be deemed inappropriate. The proposed pods will have some impact on both the RHPG and the setting of Kinmel Hall. The current dilapidated condition of Kinmel Hall, and the urgent repairs that is needed to safeguard the building from further disrepair is a valid consideration when assessing the merits of this application. The monies generated is deemed essential by the applicant in helping to pay for the repairs on the hall and is considered enabling development.

The plans provided are basic and do not offer much detail. From the information provided it is welcomed that these pods will have no hard landscaping associated with them, no lighting, and no car parking next to the pods. The proposed parking is next to the hall in an area already containing hardstanding. It is welcomed that the parking is away from the principal facade of Kinmel Hall. The proposed pods are easily removable and the development reversible. The temporary nature of the camping pods will ensure that there will be no long term impact on the setting of any of the heritage assets on site.

As mentioned above, the pods are to fund the repairs to the Hall, and mention is made to a Business Plan. I have subsequently viewed the business plan which sets out the business case for the retention of the pods. The profits from the pods should unquestionably be tied to the continued repairs of Kinmel Hall, with no room for ambiguity. Permission for the pods should be refused if this is not clear. It is of course critical that the scheme shows clear profit otherwise it is of limited value in terms of enabling development.

The current pods are brightly coloured, and in my opinion detract from the setting of the heritage assets on site. Whilst some are coloured in muted colours, the remaining pods will need to be repainted in more muted tones. I am happy to offer further comments on any proposed painting scheme. The scheme also proposes one compost toilet. I am content that a compost toilet would be most appropriate in this instance as it negates the need for the discharge of waste and associated works, however I do wonder if one is sufficient, and should more be proposed this could have additional impact.

Kind regards,

Gareth

Gareth Roberts BSc PGDip MSc IHBC

Swyddog Cadwraeth / Conservation Officer
Cyngor Bwrdeistref Sirol CONWY County Borough Council
01492 575317

www.conwy.gov.uk/planning



Rydym yn croesawu gohebiaeth yn Gymraeg. Bydd y Cyngor yn ymateb i unrhyw ohebiaeth yn Gymraeg ac ni fydd hyn yn arwain at unrhyw oedi / We welcome correspondence in Welsh. We will respond to any correspondence in Welsh which will not lead to a delay



Ysgrifennwch ataf yn Gymraeg neu Saesneg
Please write to me in Welsh or English

From: ERF Mail
Sent: 14 September 2022 12:53
To: CynllunioPlanning
Cc: Ruth Haf Evans
Subject: Planning Responses
Attachments: 0-50010 - Ruth Evans.pdf; 0-50004 - Ruth Evans.pdf

**CONWY COUNTY BOROUGH
COUNCIL
DEVELOPMENT CONTROL**

RECEIVED: 14/09/2022

APPLICATION NO: 0/50004

ERF Mail

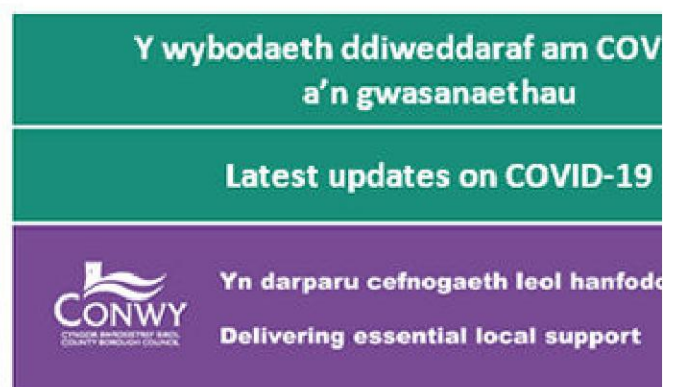
Yr Amgylchedd, Ffyrdd a Chyfleusterau / Environment, Roads & Facilities
Cyngor Bwrdeistref Sirol CONWY County Borough Council
Swyddfeydd Mochdre / Mochdre Offices
Bae Colwyn / Colwyn Bay LL28 5AB
Ffon / Tel: 01492 575337
E-bost / Email: erfmail@conwy.gov.uk

Rydym yn croesawu gohebiaeth yn Gymraeg. Bydd y Cyngor yn ymateb i unrhyw ohebiaeth yn Gymraeg ac ni fydd hyn yn arwain at unrhyw oedi.

We welcome correspondence in Welsh. We will respond to any correspondence in Welsh which will not lead to a delay

Sefyllfa Bresennol Gwasanaethau'r Cyngor | Council Services Current Situation

Rydym yn croesawu gohebiaeth yn y Gymraeg a'r Saesneg fel ei gilydd. Ni fydd gohebiaeth yn yr un iaith na'r llall yn arwain at unrhyw oedi. We welcome correspondence in both Welsh and English. We will respond to correspondence in either language without delay.



MEMO

At / To	Head of Regulatory Services & Housing FAO: Development Control
Copi / Copy To	
Oddi Wrth / From	G.B. Edwards, Head of Service
Ffôn / Tel	01492 575337
E-Bost / E-Mail	erf@conwy.gov.uk
Fy Nghyf / My Ref	
Eich Cyf / Your Ref	
Dyddiad / Date	14/09/22

Planning Consultation 0/50004
Kinmel Park
Kinmel Hall
Primrose Hill
St George
LL22 9DA

We are aware that an application for full planning permission has been received for the above site and have the following comments.

Surface Water Management and Flood Risk

The site is located in DAM Zone A as defined within TAN15. NRW's surface water flood map identifies a low risk of flooding to the development site.

Sustainable drainage is proposed for the development. Details of this drainage strategy will need to be submitted to the SAB separately.

SuDS Approval Body Requirement

As you will be aware, from the 7th of January 2019 any new development of more than one dwelling or that involves construction work of more than 100m² is required to obtain approval from the SuDS Approving Body (SAB) prior to the commencement of those construction works. Due to the proposed construction size of 16 pods and compost toilet, SAB approval will be required prior to the commencement of any works on site.

Due to the scale and nature of the development I would request the following Note to Applicant be included should the application be successful:

Note to Applicant – SAB Approval Required

Following the commencement of Schedule 3 of the Flood and Water Management Act, the works as proposed are required to obtain approval from the SuDS Approving Body (SAB) prior to commencement of those construction works. Further details of the SAB, the new national standards, the pre-application advice service and the application for approval process can be found on the Conwy County Borough Council SAB webpage: www.conwy.gov.uk/sab or by contacting the SAB Team directly at SAB@conwy.gov.uk



for G.B. Edwards
Head of Environment, Roads & Facilities

Changes to surface water drainage requirements

Please note that as of 7th January 2019 sustainable drainage requirements within the Flood and Water Management Act 2010 have come into effect. Any construction works covering at least 100m² will require consent from the SuDS Approval Body (SAB) in addition to Planning Approval.

In order to gain SAB approval and fully realise the benefits, drainage proposals need to be addressed at the outset of development planning and in coordination with other appropriate disciplines such as water conservation, landscaping and biodiversity.

More information can be found at www.conwy.gov.uk/sab

Julia Anne Jones

From: donotreply@dwrcymru.com
Sent: 14 September 2022 11:31
To: CynllunioPlanning
Cc: BPMCopies@dwrcymru.com
Subject: Re.PLA0067935. Notification
Attachments: PLA0067935.doc

**CONWY COUNTY BOROUGH
COUNCIL
DEVELOPMENT CONTROL**

RECEIVED: 14/09/2022

APPLICATION NO: 0/50004

Dear Customer,

Please find attached important information relating to your application.

Should you wish to contact us for any reason, you must use the contact information shown on the attachment(s).

Please do not reply directly to this message.

Best regards,

Developer Services
Dwr Cymru Welsh Water

Dwr Cymru Welsh Water is firmly committed to water conservation and promoting water efficiency. Please log on to our website [https://urldefense.com/v3/__http://www.dwrcymru.com/waterefficiency__;!!HmeVo1Y8dysd!8ZWYQ9-78AKn_Qpf6fS17c8HTvy6tcyvPafXG3ALZ4HuEV_edIFBKYSx3TGFNPd9Kmj3r1kbkWuOI-i7U-dOrb_OK0oWVpmXeNk\\$](https://urldefense.com/v3/__http://www.dwrcymru.com/waterefficiency__;!!HmeVo1Y8dysd!8ZWYQ9-78AKn_Qpf6fS17c8HTvy6tcyvPafXG3ALZ4HuEV_edIFBKYSx3TGFNPd9Kmj3r1kbkWuOI-i7U-dOrb_OK0oWVpmXeNk$) to find out how you can become water wise. Mae Dwr Cymru Welsh Water wedi ymrwymo i warchod adnoddau dwr a hyrwyddo defnydd dwr effeithiol. Mae cyngor i' ch helpu i ddefnyddio dwr yn ddoeth yn [https://urldefense.com/v3/__http://www.dwrcymru.com/waterefficiency__;!!HmeVo1Y8dysd!8ZWYQ9-78AKn_Qpf6fS17c8HTvy6tcyvPafXG3ALZ4HuEV_edIFBKYSx3TGFNPd9Kmj3r1kbkWuOI-i7U-dOrb_OK0oWVpmXeNk\\$](https://urldefense.com/v3/__http://www.dwrcymru.com/waterefficiency__;!!HmeVo1Y8dysd!8ZWYQ9-78AKn_Qpf6fS17c8HTvy6tcyvPafXG3ALZ4HuEV_edIFBKYSx3TGFNPd9Kmj3r1kbkWuOI-i7U-dOrb_OK0oWVpmXeNk$)

***** This email and any file attached is confidential. If you are not a named recipient or believe you may have received this email in error please delete from your system and promptly inform the sender. Dwr Cymru Cyf (trading as Welsh Water) is a company registered in England and Wales, number 02366777, registered office Linea, Fortran Road, St Mellons, Cardiff CF3 0LT. Mae'r neges e-bost yma ac unrhyw ffeil sydd ynghlwm wrthi'n gyfrinachol. Os nad chi yw'r derbynnydd a enwir, neu os ydych chi'n credu eich bod wedi derbyn y neges yma ar gam, dylech ei dileu o'ch system ar unwaith a hysbysu'r anfonwr. Cwmni sydd wedi ei gofrestru yng Nghymru yw Dŵr Cymru Cyf (yn masnachu fel Dŵr Cymru), ei rif cofrestredig yw 02366777, ,, ac mae ei swyddfa gofrestredig yn Linea, Heol Fortran, Llanelwyr, Caerdydd, CF3 0LT. *****

Conwy County Council
Civic Offices
COLWYN BAY
LL29 8AR

Date: 13/09/2022
Our Ref: PLA0067935
Your Ref: 0/50004

Dear Sir/Madam

Grid Ref: SH979748 297962 374870

Site: Kinmel Hall Kinmel Park St George

Development: Siting of 16 camping pods and compost toilet for a temporary period of time (6 years)

We refer to your planning consultation relating to the above site, and we can provide the following comments in respect to the proposed development.

As the applicant intends utilising a private treatment works we would advise that the applicant contacts Natural Resources Wales who may have an input in the regulation of this method of drainage disposal.

However, should circumstances change and a connection to the public sewerage system/public sewerage treatment works is preferred we must be re-consulted on this application.

The developer should contact us at the above address or on telephone 0800 9172652 for further information on this matter.

Our response is based on the information provided by your application. Should the proposal alter during the course of the application process we kindly request that we are re-consulted and reserve the right to make new representation.

If you have any queries please contact the undersigned on 0800 917 2652 or via email at developer.services@dwrcymru.com

Please quote our reference number in all communications and correspondence.

Yours faithfully,

Developer Services

Julia Anne Jones

From: paul jones [REDACTED]
Sent: 12 September 2022 17:29
To: CynllunioPlanning
Subject: Reference 0/50004

This Message Is From an External Sender

This message came from outside your organization.

Dear Sirs,

With reference to the above planning application for Kinmel Hall, Kinmel Park, St George LL22 9DA, please register this email as an objection to such application on the grounds mentioned below:

- 1 The proposed application is not in-keeping with the character of the hall
- 2 Access to and from the property is via a single track road which is completely inappropriate for a development of this nature. The road is already in disrepair and would not be able to sustain additional traffic using it.
3. Outside the entrance to the hall is the village school, again, additional traffic could cause a massive health and safety problem in the area.
- 4 We believe the property to be Grade 1 listed, but in addition to this, the grounds are Grade 2 listed. The proposed development would harm the environment by way of noise and air pollution. .
- 5 The owner had already operated such a campsite without permission, and would probably have continued to do so had the council not justly received numerous complaints.
- 6 Without sight of any sort of business plan for the hall, we are at a loss to see what benefit this development would be for the area

We therefore request that this application be refused in its entirety.

Yours faithfully

Paul and Andrea Jones
2 Rhiwlas, Abergele LL22 8EQ
12th September 2022

<p>CONWY COUNTY BOROUGH COUNCIL DEVELOPMENT CONTROL RECEIVED: 12/09/2022 APPLICATION NO: 0/50004</p>
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PATRONS
LORD FELLOWES
PETER HOWELL



PATRONS
THE MARQUESS OF ANGLESEY
MICHAEL FITT O.B.E

9th October 2022

Representation To Conwy Council Planning Committee
With Regards To The Planning Application
For Kinmel Hall

Dear Sir,

HOW MUCH DOES WELSH HISTORY MEAN TO YOU?

My name is Paul Hughes and in February 1981 I stayed at a Christian Conference Centre in North Wales called Kinmel Hall. This started a 41 year involvement with this Grade 1 Architectural Masterpiece with a history to match. In 1986 I began researching her History and I am still researching it to this day because she has surprises yet to be uncovered – so long as she is still around!

I make no apologies for the length of this letter. It only touches the surface where the problems this planning application is likely to cause to this historic and magnificent building and its equally important historic Estate. The Kinmel Estate is one of only two Estates William Eden Nesfield ever designed. The other is Hampton in Arden.

The current situation with ***Nesfield's Crown*** is one of deplorable neglect and deliberate damage on the part of its most recent owners and the unforgivable attitude of the Officers of the Council whose responsibility it is to protect the Countries Heritage for future generations. Granting this application would be another example of this 'not my problem' approach.

I am making these representations because I have grave concerns about the preservation of the Historic Value of the Site

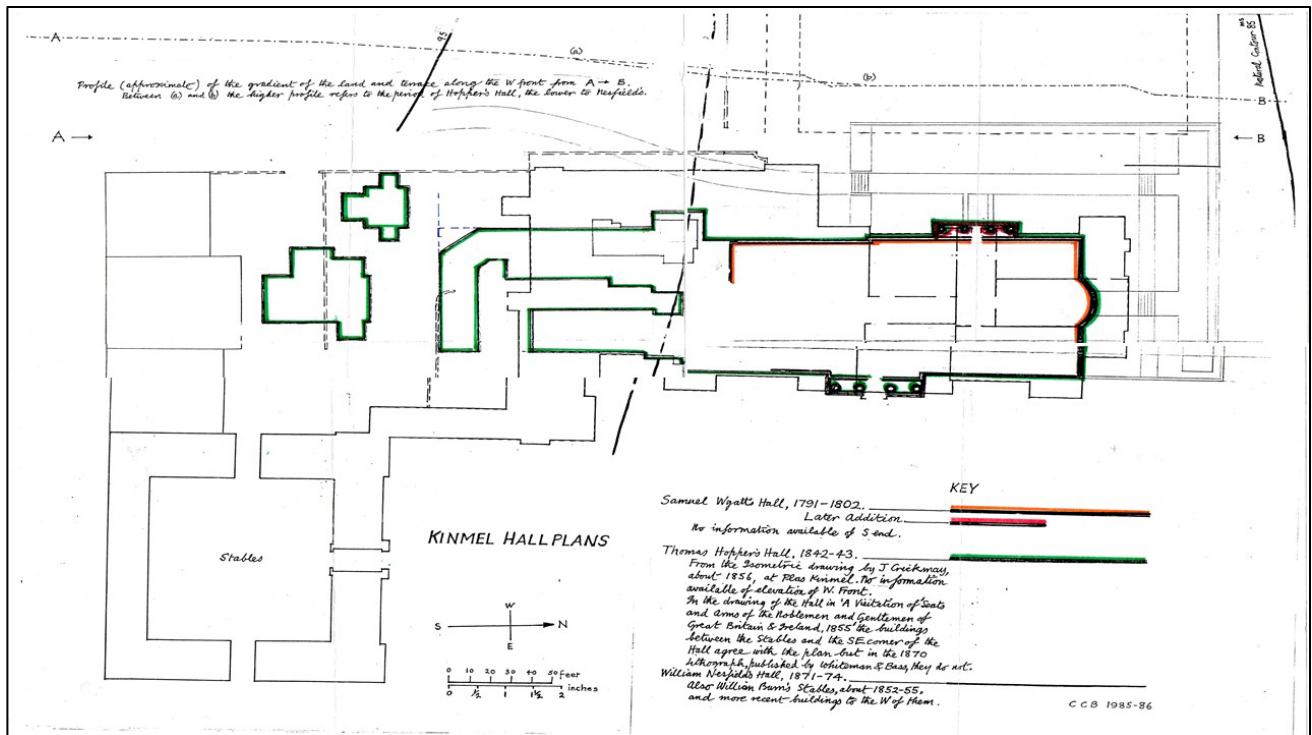
Ignorance is no defence in a Court of Law and so it is down to those of us who know the Hall and her chequered History to ensure those who do not are made aware of the relevant sections of her History and how they relate to this Planning Application and the potential irreparable damage granting it may cause.

Mr Henry George Fetherstonhaugh OBE DL - Lord Lieutenant of Clwyd, Lord Mostyn, Lord Langford, Sir Simon Jenkins, Timothy Cooke, Dr Harry W Fleming, Mrs Elaine Boxhall (nee Southon) , Matthew Beckett, Jonathan Fenton-Vince, Stella Mew, Peter Hare, Alison Richards, David Hall, Diana Malsher, Phil Vince, Mark Girouard, Marcus Binney, Tom Taylor, Rosie Burton, Youth Fellowship Rally, Dream Heritage, et al

Sir Winston Churchill is credited with the saying: -

'A riddle wrapped in a mystery inside an enigma'

This is a perfect description of Kinmel Hall!



PLANS OF THE THREE KINMEL HALL'S

Drawn By Cyril Blakeman

What is NOT shown here is the fact that the 1872 Nesfield Hall is built AROUND the 1842 Hopper Hall and SITS on the 1791 Wyatt Hall!

I must state at the outset that the careful and considerate restoration of this 'Old Lady' is something I am more than happy to support and encourage - as I have been trying to do since 2013 when things began to go wrong.

However, this restoration must be done correctly and with the due care and attention that such an old yet historic building demands. The current application before the Council is not one that I feel respects any part of her History and is not a viable means of Income Generation to meet the substantial costs of the restoration of the Grade 1 Masterpiece in whose grounds the Pods are sited.

Before I continue, there are a couple of important facts the reader must keep in mind –

1. HISTORIC - NONE of the restoration work carried out between 1978 – 84 or the retrospective work carried out in 1995 – 96 to lift the Section 10 Closure Order was carried out with LISTED PLANNING CONSENT!
2. CURRENT – Unlike the first time this Planning Application was submitted on 2nd February 2022, THIS application is missing the **PLANNING AND HERITAGE STATEMENT** which carries a considerable amount of information which, whilst inaccurate in many cases, should be with the documents before the Planning Committee to enable them to compare the information given by the owner of the site and the Historical Facts contained in this document.

To explain why I feel this application should not be passed I will work on the basis that the person reading this does not know the site or her history and will guide them around my former home using the Planning Application as a guide in conjunction with a prospective campers route to the site and to the pods.

Currently, Kinmel Hall is approached by a single road which comes off Primrose Hill – named after Primrose Hill in Regents Park possibly! The road begins in historic woodland, being the site of the Canadian Transport Camp of 1919.

This woodland gives way to open farmland which is part of the Grade 2* Listed Historic Park and Garden being the original 1,000 acre Park belonging to the Hall. The Boundary of which is defined by the Abergele Straights as they are known locally.

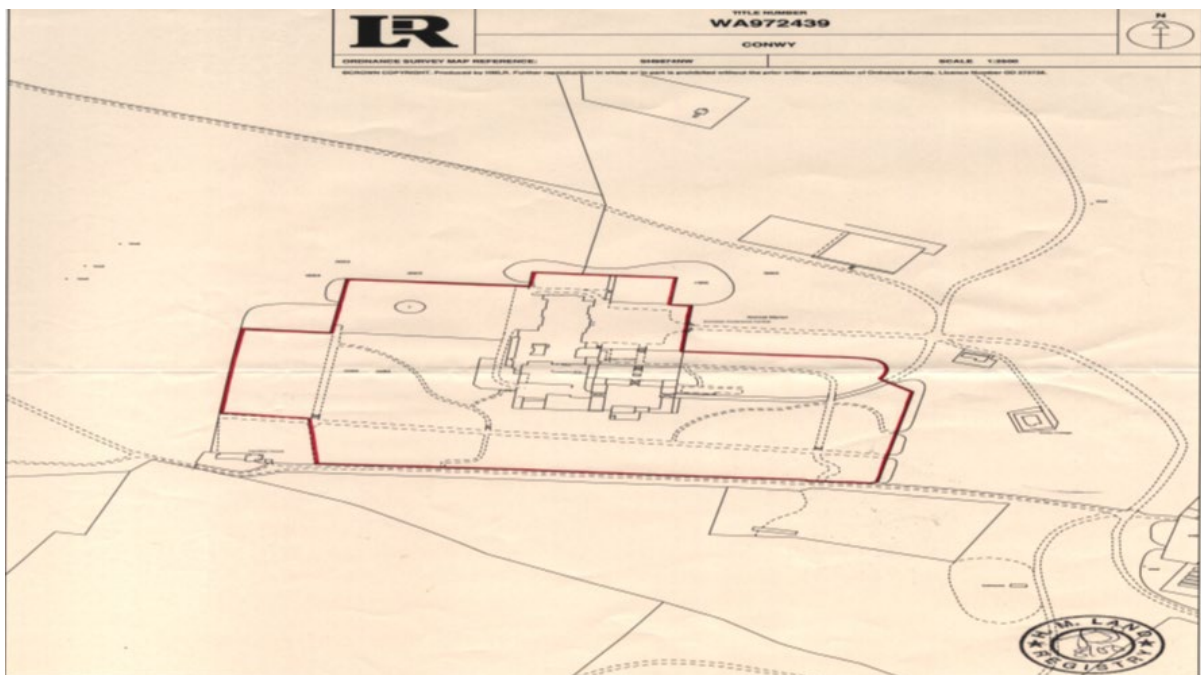
These grounds themselves seem to hide the hall until the last moment. Almost shyly the building keeps you waiting for your first glimpse. Some chimneys and a fleeting side section glance before a right turn brings you to face directly onto Nesfield's crown, the stunning French Renaissance architectural masterpiece built as Kinmel Hall.

Having made this right turn and started down Church Street you come to the first problem with the application.

When Kinmel Hall was sold at Auction in May 2021. She was sold without the right of access to any of the roads leaving the Estate.



SITE PLAN OF KINMEL HALL AS SHOWN BY AUCTIONEERS 2021



SITE PLAN OF KINMEL HALL AS HELD BY THE LAND REGISTRY

In 1978, access to Kinmel Hall was via the St George's Drive which brought you around the Hall from the South West and up to the East Front of the Hall as well as via the Primrose Hill Drive which was created following the introduction of the A55 which cuts across the original Main Entrance to the Estate via The Golden Lodge.

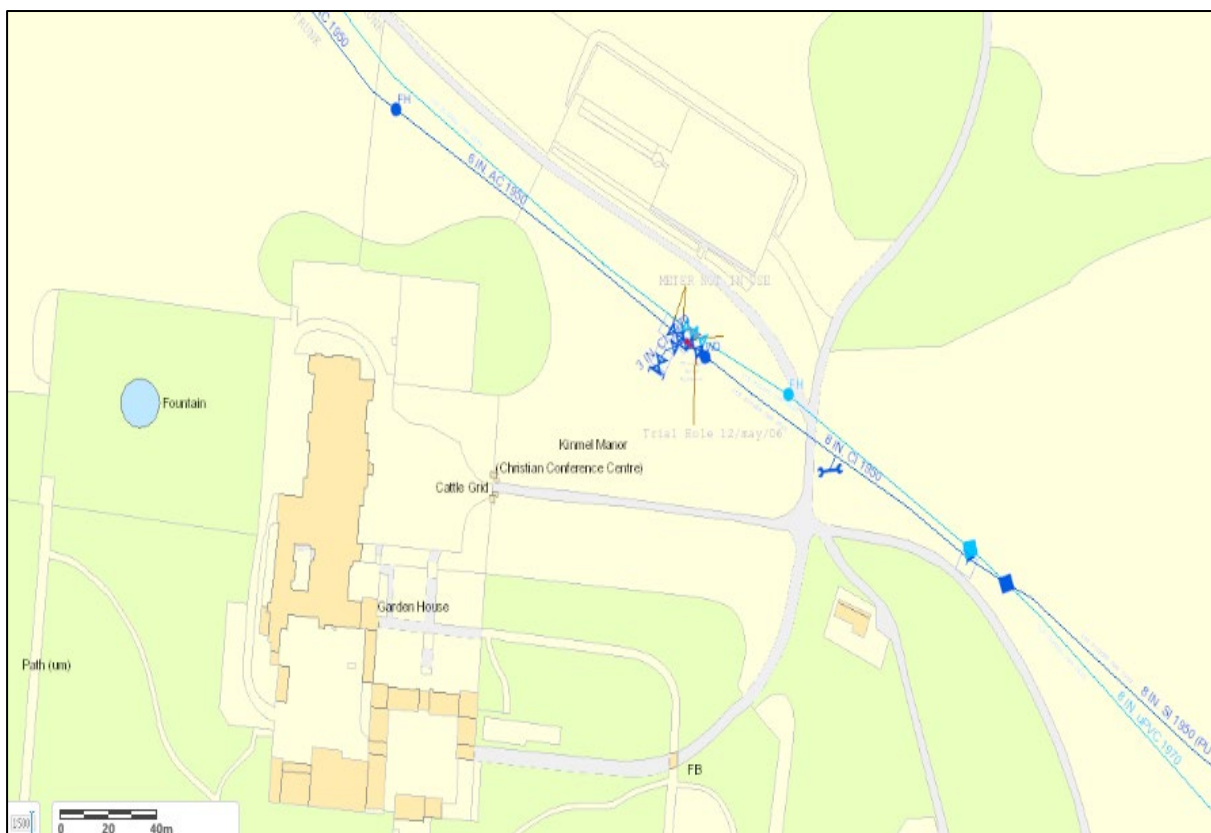
However, during the changes of ownership of the Hall from 2000 – 2021 this access has changed – partly due to the deterioration of the St George

Drive but also because of the changes in the Estate Management and use of the land.

In 2011, when Mr John Anthony bought Kinmel Hal and the 18 acres of gardens for £1,500,000. It was sold without right of access.

Due to his serious Health problems, John Anthony was never well enough to meet with the representative of the Kinmel Estate and the Erkman sisters never acknowledged the existence of the family who own the Estate or their association with the Hall. Their opinion was that 'It is just one of those British Idiosyncrasies'.

As you approach the gates of the Hall you pass the second problem with the application.



SITE PLAN OF KINMEL HALL MAINS WATER SUPPLY FROM DWR CYMRU

When Derbyshire Investments went into receivership in 2007, on the instructions of the Receivers, the Mains Water supply was capped off and the Meter removed. There has not been and there are no plans to connect 'The Pods' to the mains water supply according to the application.

In the Planning Application documentation it refers to the use of existing hard standing and driveways for access to the Glamping Pods



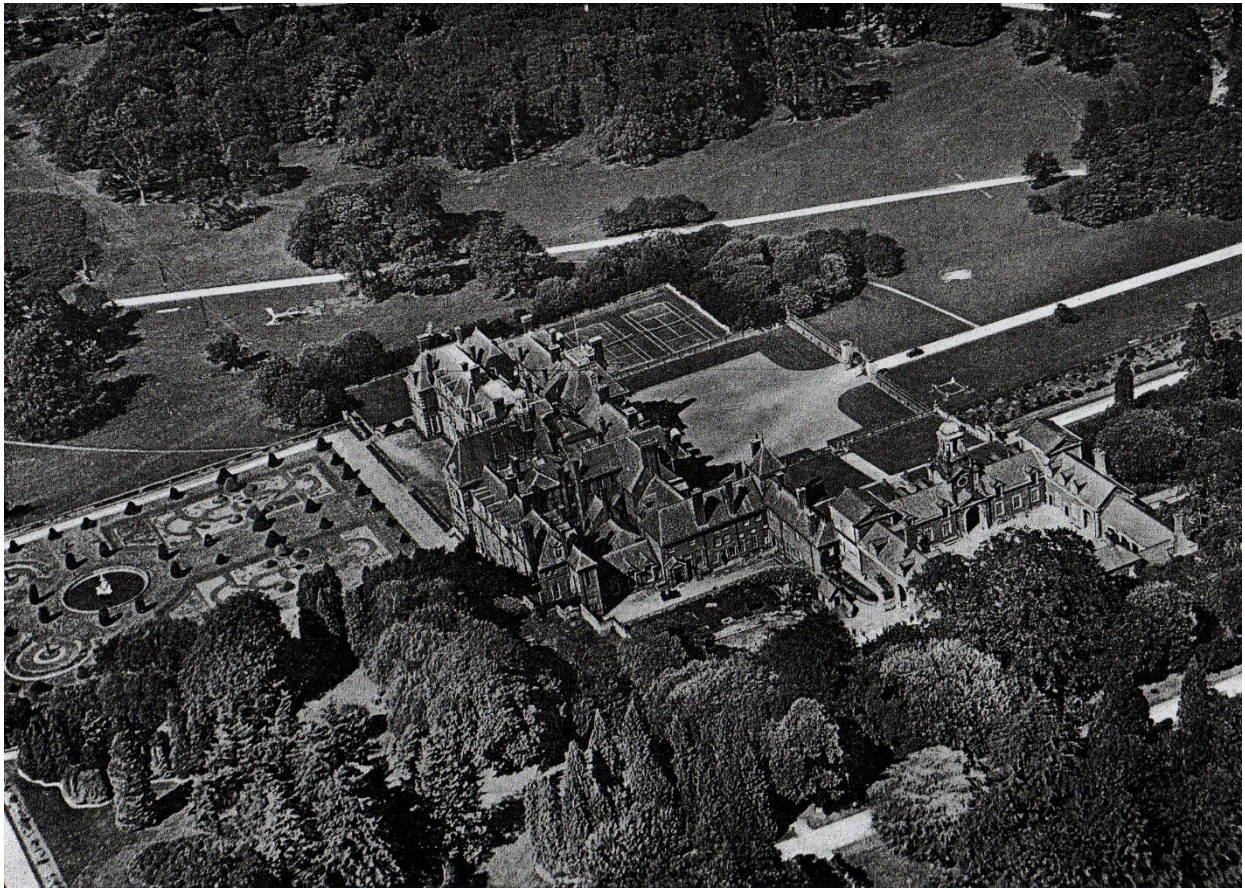


Aerial View of the grounds referred to in the plan

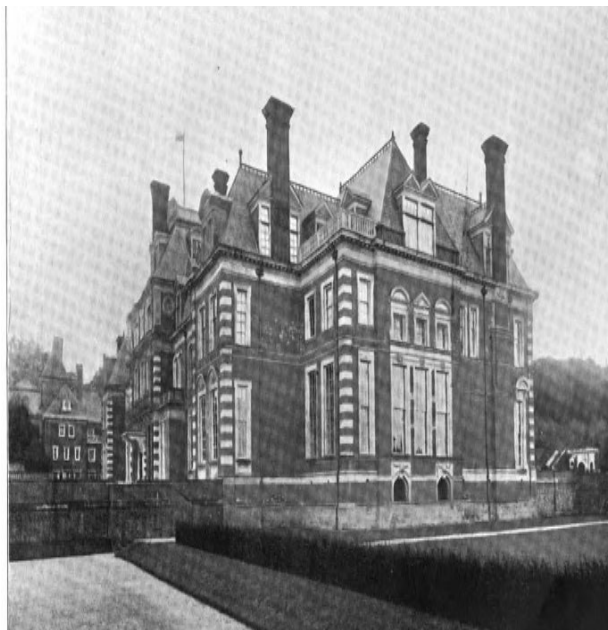
Photograph showing hard standing to west of Kinmel Hall



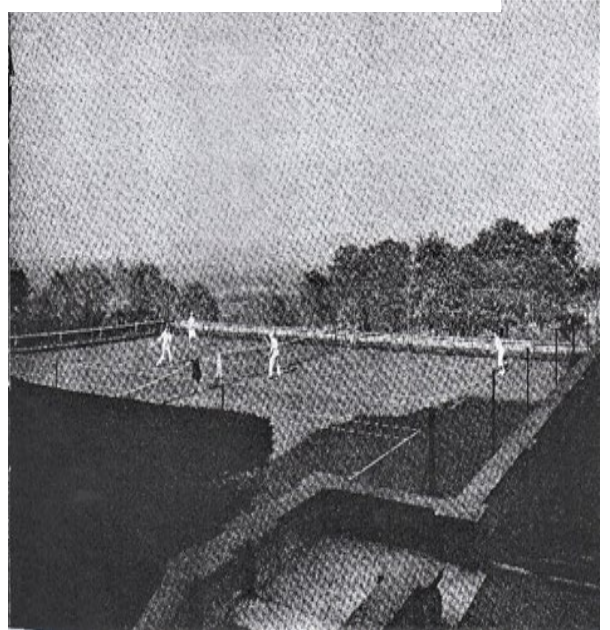
WHAT CAN BE SEEN



WHAT CANNOT BE SEEN



NORTH EAST CORNER



TENNIS COURTS AND TERRACING



THE NORTH EAST CORNER BY THE LIBRARY
CIRCA 1960 – CLARENDON SCHOOL

On the 29th September 1975 Fire ripped through the Hall from the South West Wing to just past the central pavilion on the East Front. There were two main reasons why the Fire was able to do such damage to this fine old building: -

- Firstly, no one at the School on the day of the fire was aware that the roof held a design quirk of the Architect W E Nesfield –

WOODEN PANELLING ON THE INSIDE OF THE RAFTERS.

This created an easy path for the fire – once it had worked its way up the ‘chimney like’ design of the room where it began and the rooms above – to not only rip across the roof onto the West Front but along her length as well.

- Because of the architectural features around the outside of the Hall and the Orchard to the rear – there was NO vehicular access to the West Front of the Hall and so to the source of the Fire. This was as close as they could get to it.



In 1978, when Eddy Vince began restoring the burnt out shell of the Hall, the Fire Brigade insisted that vehicular access to the West Front of the Hall be created.

In order to comply with this request and taking into consideration the limited funds available to Eddy to restore such a massive building it was necessary to be ‘creative’ when the funds were not available for certain projects.

The driveway that goes around the North End of the Hall is built **ON TOP** of W E Nesfield’s Ornamental Terracing as seen in the above photos taken before the fire.

The Croquet Lawn is still under the driveway. The terracing is visible under the 4 paving slabs at the NE corner of the Hall as well as by the Tennis Courts opposite the Library as seen here: -



This photo was taken at the Open Day in April 2021



WHAT CAN BE SEEN



WHAT CANNOT BE SEEN

Similarly, when it comes to vehicular access from the North and South ends of the Hall, 'creative' thinking came into play.



One of the first architectural features to go were the walls to the left of the Drawing Room and to the right of the Chapel/Kitchens as shown in this photo from Country Life in the 60's.



This image is Crown copyright and is reproduced with the permission of the Royal Commission on the Ancient and Historical Monuments of Wales (RCAHMW), under delegated authority from The Keeper of Public Records.

Another feature that has been covered up by the tarmac are the Ornamental Steps into the Venetian Garden as seen in the above image.

If you stand at the North West corner of the Hall at the end of the wall demolished to make way for the road. A 'sink hole' is visible near to that wall.(As Shown in Allsop's images!)

This is because the hardcore used to create the road has been slowly decaying since the 1980's when the road was built. It has been decaying because it is wooden timbers from the 1975 fire that were dug out of the Chapel and other areas of the Hall when clearing the rooms in preparation for the restoration. An example of the debris used can be seen here: -



The roads to the North and West of the Hall
have not been maintained for 20+ years.

As this is the access route for North Wales Fire Service to the area where 'The Pods' are located. It is unlikely that the Fire Engines will make it around the North end of the Hall or down the sloping drive from the South end of the Hall based on these figures: -

Dimensions: -
Length: 10.5 metres,
Width: 2.3 metres,
Load weight: **12 TONNES**
Source: - Scania

The documentation also refers to using the car park on the West Front of the Hall for the people using 'The Pods'.

Separately from the potential problems of the road access to this area. There are grounds for grave concerns over the stability of the tarmac area proposed for the parking of the cars.

The first Hall on this site was designed by Samuel Wyatt between 1791 – 1802. The previous home still exists in the grounds of the Kitchen Gardens to the South-East of the Hall and dates to 1555.

There are at least two tunnels that run under the current Hall and into the Parkland. They are accessed from the cellars of the Wyatt building which are the cellars of the current Hall.

They exit the Hall from the West Front of the Hall. The Tunnels are accessed by way of a set of steps that were sealed up in the late 70's just outside the single gate into the Park at the North end of the Hall.

These tunnels were last surveyed in the 1980's and their current condition is not known as they have been sealed up.

Apparently, the final stage of access to 'The Pods' is partly via an existing informal path as can be seen here



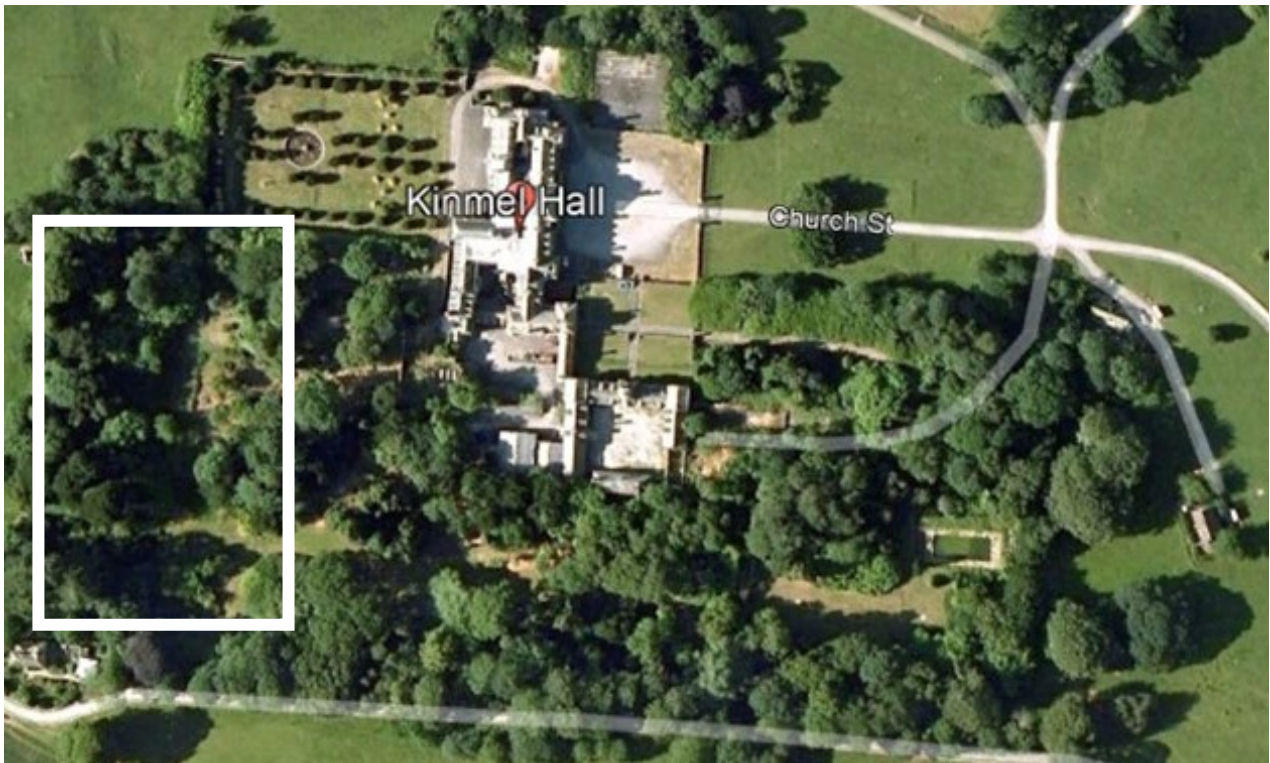
This is NOT an informal path.

Proof of this can actually be seen in the right hand side of the photograph used to show the 'path'!

Prior to Derbyshire Investments going into receivership, the owners of the Hall had plans to build houses in the Woodland and overlooking the Venetian Gardens and the Panoramic Views of the Coastline. (***Please see later references to this and proof of the councils objections***)

In preparation for this, a substantial amount of Timber was felled by the owner of the Hall – without notification to the relevant authorities – this included trees in the area over the Venetian Gardens and adjacent to the South West wall of the grounds of the Hall – the site of ‘The Pods’.

Recent research – September 2022 – has thrown up information that shows just how unstable the grounds beneath the pods potentially are!



This image of the grounds, taken from GOOGLE EARTH PRO on the 6th September 2022 using the *Historical Imagery* facility shows the ANCIENT WOODLAND that was present in 2006. The area Highlighted is the area the pods are currently located – on the instruction of the Enforcement Officer.



This is the same area magnified

The date of the image is the 19th May 2018.

A hand-drawn map of a residential area, likely a schoolyard or a small neighborhood. The map shows several buildings labeled '5b house' and '4b house'. There are numerous trees represented by circles, some labeled 'Evergreen Oak', 'Sycamore', 'Lodestar Tree', and 'Holly'. A street runs along the right side of the map, with a path leading from the bottom right towards the center. The map is drawn on a grid of lines, possibly representing a street grid or a property boundary. A north arrow is located in the top right corner, pointing towards the top of the page. The map is titled 'ION' in the top left corner.



This is the same area magnified!

As can be clearly seen, a substantial amount of Timber has been removed entirely from this area – including the trunks and roots!

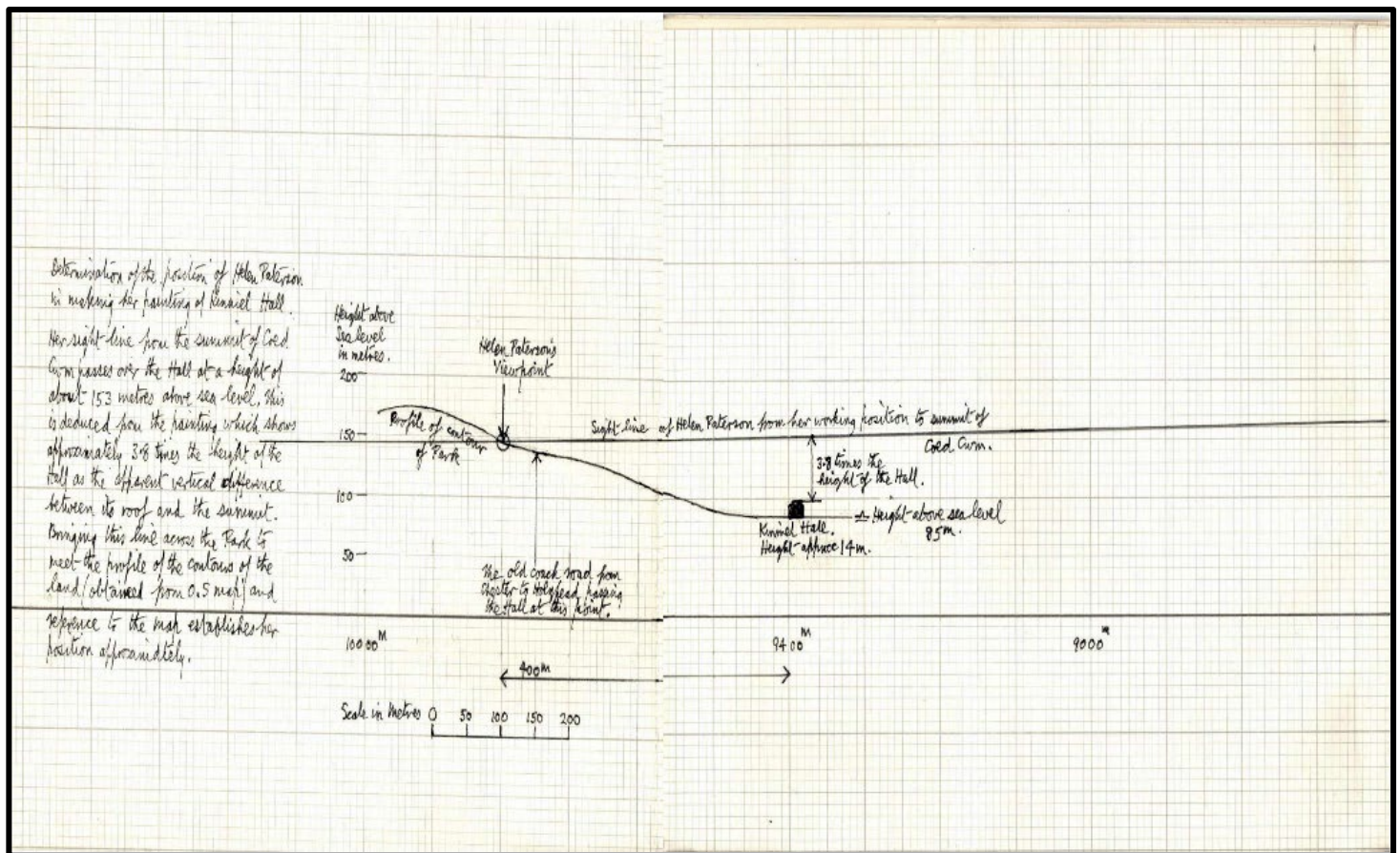
As this was done in around 2008 and the current owner has no knowledge of this – similarly the Enforcement Officer responsible for the resighting of the Pods into the surroundings of Ancient Woodland – he will not be aware of the true nature of that area of the grounds.

All of this is clearly backed up by Helen Allingham R.W.S. (1848-1926) – one of the most famous watercolourists of the Victorian Era.



This Watercolour, done before Helen was married, was found by Miss Sheila Haughton, Headmistress of Clarendon School For Girls, in the cellars of

Kinmel Hall. Subsequent research carried out by Cyril Blakeman R.C.A. which confirms the location of the watercolour as shown here: -



What is MORE important is the presence of the Woodland surrounding the Hall. This view looks at the WEST Front of the Hall designed by Thomas Hopper in 1841 to replace the Wyatt Building that was destroyed by fire on the 29th September 1841!

The Hopper building sits within the walls of the Nesfield building which locks its position relative to this watercolour. If the woods surrounding Kinmel Hall were present at the time when this Watercolour was created in July 1865 then they were present when the current Hall and first Formal Gardens were created just 7 years later for Hugh Robert Hughes.

The trees were present when, in 1841, the Private Fire Hydrant System was created due to their size and foliage as shown in the watercolour. The plan for the system would have had to take into consideration the existence of these trees and whilst some MAY have been removed to make way for it the majority remained untouched until the clearance of 2008.



This photo, taken in 1970, looks from the steps at the edge of the 'Broadwalk' at the top of the path from the summer house towards the hall where some of the Pods are now located 'on instruction from the Council!'

It is stated in the Planning Application that: -

- 3.1.4 The open areas of mown grassland contain a flora dominated by mosses and herbs indicative of acidic to neutral ground conditions (see Table 2).

Table 2 Grassland species list

LATIN NAME	COMMON NAME
<i>Veronica chamaedrys</i>	Germander speedwell
<i>Festuca rubra</i>	Red fescue
<i>Luzu/a campestre</i>	Field woodrush
<i>Rhytidiadelphus squarrosus</i>	a moss
<i>Trifolium repens</i>	White clover
<i>Potenti/la erecta</i>	Tormentil
<i>lotus corniculatus</i>	Bird's-foot trefoil
<i>Cerastium fontanum</i>	Common mouse-ear
<i>Achillea millefolium</i>	Yarrow
<i>Ranunculus repens</i>	Creeping buttercup

- 3.1.5 The species mix approximates to a National Vegetation Classification (NVC) of U4b *Festuca bovina*-*Agrostis capillaris*-*Galium saxatile* *Holcus*

lanatus-Trifolium repens grassland, despite most of the key indicators missing from the species list.

This is termed a haymeadow grassland and is listed as priority habitat.

3.1.6 Camping pods are positioned at the edge of open parkland, beneath specimen trees. The area has recently been cleared of scrub, and a growth of nettles has developed (Figure 4a).

This information is not correct!

Kinmel Hall's first Formal Gardens were created in 1872 by William Andrews Nesfield and Markham Nesfield – his eldest Son.

The Landscaping of the Gardens was created with specimen plants brought in from around the *British Empire* together with the two Marble Pillars that stand in the Venetian Gardens which declare their origins at their base

CARTHAGINA

SURVIVOR - DESTROYED

However, with the work carried out last year and with the Council's attitude that: -

- a.) The Grounds of Kinmel Hall are NOT protected
- b.) The Gardens of Kinmel Hall are not the responsibility of the Planning Department
- c.) The 'undergrowth' removed to make way for the Pods 'Can be Replanted'

The true nature of this Historical Planting has potentially been lost due to ignorance and a 'not our problem' approach.

The Ecology Survey statement that the

'pods are positioned at the edge of open parkland'

Is also blindingly incorrect because the Hall has and always has had a boundary wall separating it from the Estate, as shown in CADW'S Full Report for Listed Buildings, are Grade 2 Star in their own right.

However, this classification is subservient to the Curtilage or 'Setting' of the Grade 1 Listed Hall. This covers an area of 1,000 acres – the Formal Park which is now a Dairy Farm.

As a result it must be asked what was the Council thinking in allowing this development to be placed so close to the boundary walls of the Hall. The proximity of Hamilton House I shall leave to Mr & Mrs Watkins to comment on as they have without fail from day one.

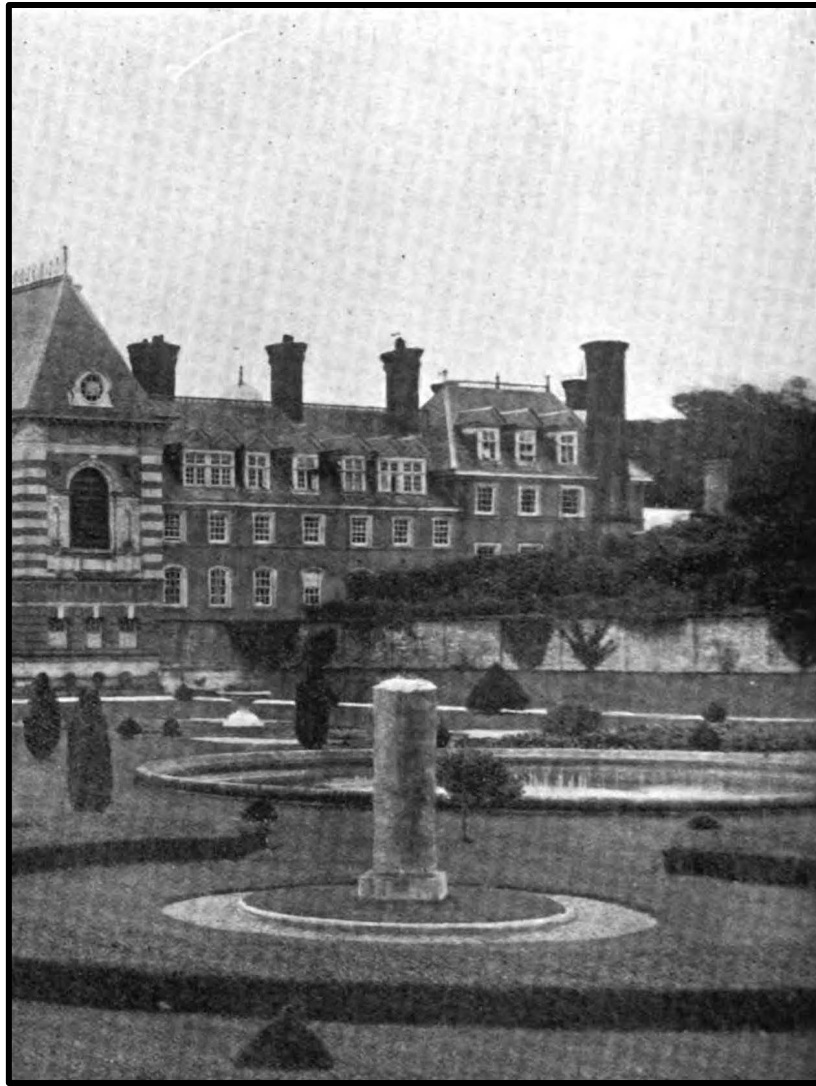
Extract from 'LONG AGO GARDEN' BY JOHN HOMER BECKETT

'My Late Father was Head Gardener at Kinmel Hall for some forty eight years ,and I recollect many famous head gardeners staying with my parents including Robert's of Tan-y-Blwch, Barnes of Eaton, Flack of Cholmondeley. Speed of Penrhyn Castle, Sanderson of Bodnant and Hay of the London Parks. The garden staff at this period consisted of twenty-five men and boys. Including the usual so called bothy men who worked chiefly in the glass-houses. The hall stands in what, we called the pleasure grounds; those consisted of lawns and shrubberies, with an Italian garden on the west side of the house.'



Access from parking area to pods

Returning to the matter of 'pedestrian access' to the Pods! The area shown in the above photograph was first 'accessed' when the boundary wall of the Gardens was 'breached' when the driveway around the South West end of the Hall was created by Eddy Vince



The postcard of Kinmel during Clarendon School's time shows the area concerned as being landscaped with mature trees covering this corner.



Proof, as I have said, can be seen in the right hand side of the photo in the Planning Documentation – the remains of a very large tree stump.



The 'informal path' was created between 2000 – 2007 by Derbyshire Investments to remove the timber felled in their preparations for the new build.

The 'removal' of a large section of the retaining wall adjoining the Chapel and removal of the embankment shown here: -

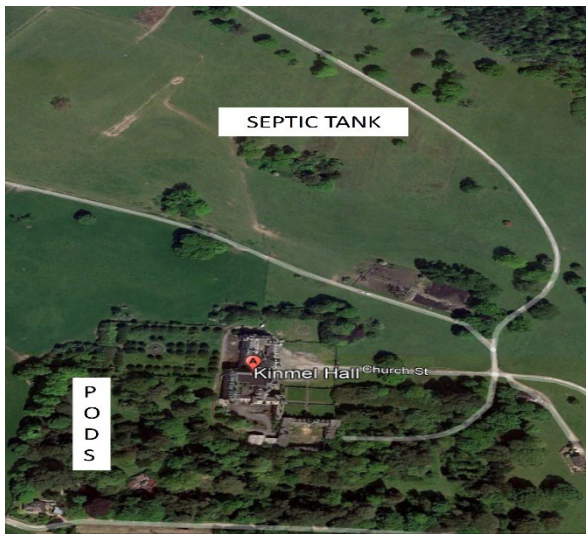


Has resulted in the integrity of the retaining wall at the Eastern end of the raised area showing serious signs of giving way. The integrity of the remaining wall, bearing in mind the weight it is holding back, must be seriously compromised as a result of the lack of maintenance over the last 20 years.

It is proposed that a compost toilet will also be located on the western side of the path as can be seen on the accompanying site layout plan.'



What is not mentioned in the document is how the compost toilet is to be emptied.



The Hall has no mains connection to the Mains Waste Water system. Instead all the drains from the Hall filter into a Septic Tank located outside the perimeter of the land owned by the Hall and within the electrified fenced area of the Dairy Farm to the North end of the Park.



In the Planning Application itself it asks a series of questions of the applicant.

I wish to draw your attention to the following extracts: -

11. ASSESSMENT OF FLOOD RISK

Is your proposal within 20 metres of a watercourse (e.g. river, stream or beck)

Will the proposal increase the flood risk elsewhere

In both cases the applicant has answered NO to these questions.

It has already been shown that the Kinmel Hall site has more than meets the eye. This is the case with the watercourses that crisscross the grounds of the Hall and the larger Estate.

To explain I need to give some History to create the context of the concerns raised here.

On Monday 27th September 1841 fire broke out in Kinmel Hall. This building had been designed by Samuel Wyatt in 1791 and altered by Thomas Hopper in 1796: -



SAMUEL WYATT'S KINMEL



THOMAS HOPPER'S ALTERATIONS TO KINMEL 1796 – NORTH ELEVATION

The Hall was totally destroyed by the fire with the exception of the North End wall. Thomas Hopper was commissioned to design and build the new Hall as quickly as possible. Included within these designs was the installation of a

Private Fire Hydrant System to the Hall. This was powered by 4 Eastham Hydrostatic Rams supplied by Green and Carter's in London.

This system, which still exists today and was supplying the Hall with water until a pipe collapse in 2019, is supplied from the reservoir behind Kinmel Hall near to 'The Rookery'.

Whilst the exact route of the pipework for the system is unclear. There are two areas where its route is known.

The first is a section of pipeline that runs under the footpath to the Hall from the Swimming Pool (The ground for the pool was cleared by Kinmel Boys School between 1929 – 1934. The Swimming Pool was not created until Clarendon School for Girls was in residence)

It is understood that this pipeline may actually come from the Kitchen Garden adjacent to the Garden House located on the Glas-Coed Drive opposite the Ice House.

The existence of this pipeline was denoted by a standard Hydrant Marker in the grassed area in front of the Stable Block.



This pipe was found to have collapsed in 2019 by Dwr Cymru. The excavation was subsequently filled in prior to the viewings for last year's auction.

The pipework is made of lead, as was the process in the 1800's, which has since been found to be dangerous for human consumption.

New evidence acquired earlier this year shows additional proof, should it be needed, that the route from the Kitchen Garden to where the pipe collapsed in 2019 is accurate as can be seen here: -



This image shows the bridge over what is now referred to as 'The Sunken Drive' which gives access to the 1855 Stable Block.

Both this structure and the Adam and Eve Archway at the start of the 'Drive' were constructed BEFORE the Stable Block.

This can be proved by this photograph: -



This image, taken by Cyril Blakeman in 1944, shows the top of the Adam and Eve Archway. The Coats of Arms are those of William Lewis Hughes – 1st Lord Dinorben – 1815 – 1852. It is the ONLY location on the Park where this Coat of Arms can be seen.

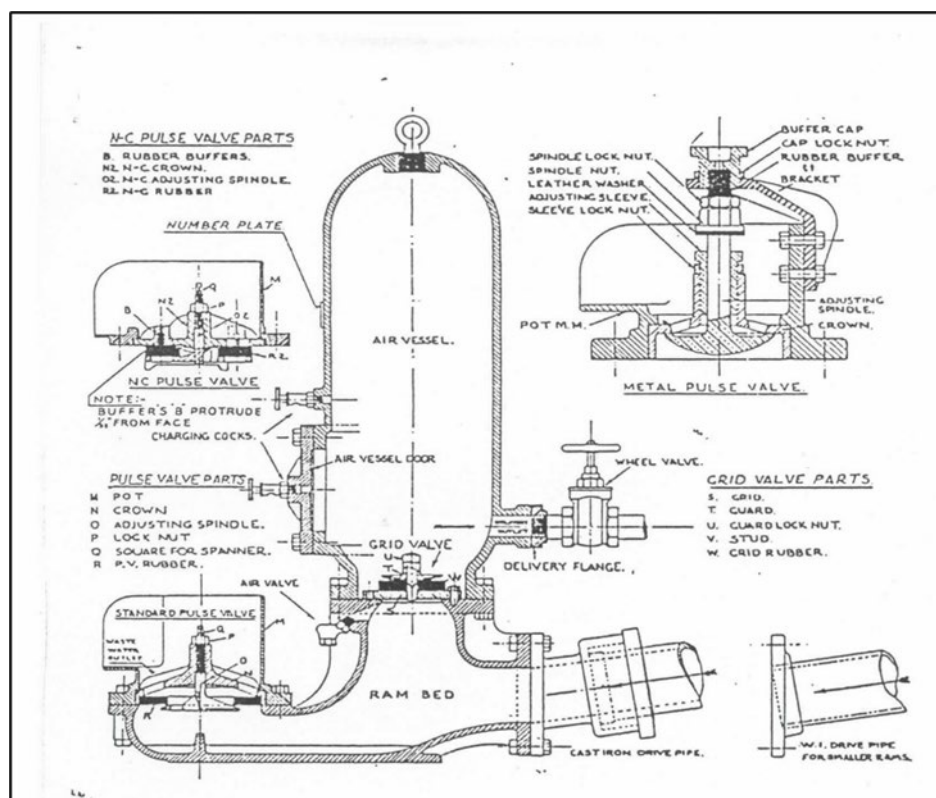
With the original bridge being in the photo pre1855 the pipeline for the Fire Hydrant System MUST be contained within the bridge's construction as the Archway is not wide enough to carry anything inside its structure.

When the Stable Block was created in 1855 for William Lewis Hughes' Nephew – Hugh Robert Hughes, the Sunken Drive must have been dug out of the existing river bed shown in the above image.

The second section of pipeline whose route is known follows the pathway adjacent to the location of 'The Pods'. This section of pipework originates, it is understood, just outside the Southern Boundary wall of the Gardens where a subterranean reservoir is located on the far side of the drive to Hamilton House.

The existence of this pipeline was identified with the assistance of a former member of Clarendon School Staff who remembers seeing the controls for the Fountain near there.

This fits with the gravitational need for the pump located underneath the gardens. The pump works on a cyclical system. The cylinder fills with water and air from a water source, once the tank is full the pressure forces the pump to activate and the chamber empties.



According to their own records the Ram installed by Green and Carter was one of the following: -

21/09/1842 1 X NO 7

28/10/1842 1 X NO 6

05/11/1842 1 X NO 6

12/11/1842 1 X NO7

This Ram was, in around 1872, used to power the Fountain designed by William Andrews and William Eden Nesfield as part of the first Formal Gardens Kimmell Hall had ever had.



Then, in the early 1900's it was changed to this design: -



WHITLEY COURT FOUNTAIN

INSPECTION REPORT ON WITLEY COURT FOUNTAINS

"I inspected the fountain last week and noted the following information: There are two fountains at Witley Court and the one at Kinmel Hall appears to resemble the smaller one rather than the main fountain.

The fountains are no longer gravity fed and a modern pump room has been constructed beneath the large fountain.

There are 4 tunnels in a cross shape aligned north south with the house. There is a metal hatch hidden beneath the path which would have been the original entrance point.

The passage that is heading furthest away from the house is blocked with soil. I have requested plans to see if a site plan showing the tunnels exists.

I also took numerous photos which I will send you separately."

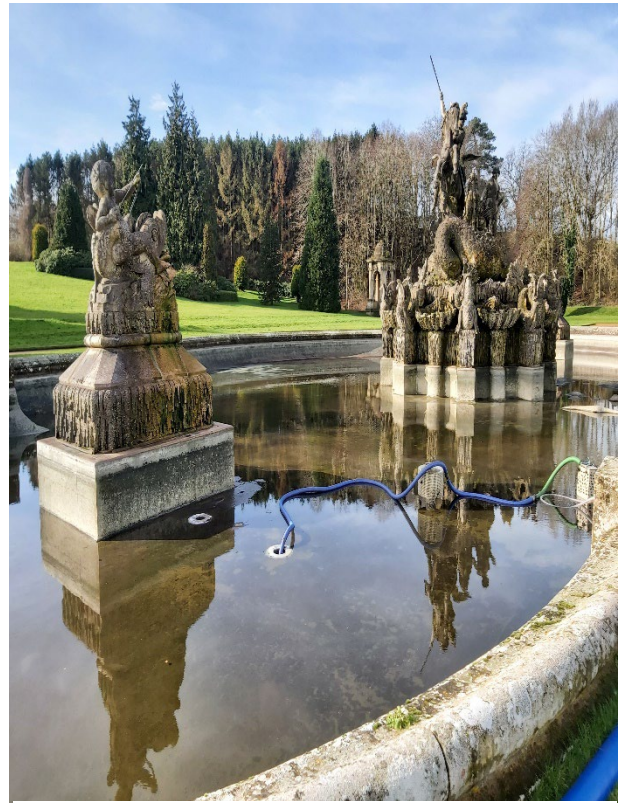
Stewart Wright | Head of Building Conservation | English Heritage



PART OF ORIGINAL NESFIELD SYSTEM



MODERN PIPES IN ORIGINAL TUNNEL



ONE OF THE TWO FOUNTAINS

THE ABOVE IMAGES ARE ©STEWART WRIGHT 2022



**PERSEUS AND ANDROMEDA
FOUNTAIN**

So, that is how the Fountain is powered. But what happens to the water that flows through the Pump?



The water re-joins the natural water courses that run under the estate. They have to have somewhere to surface. The well on corner of Terfyn Cottages is one such location. The drain hole at the bottom of the well prevents it from overflowing because it is supplied by underground water courses.

The increased water in the area of 'The Pods' from the 'washing facilities' and water brought onto site by the 'glampers' has nowhere to go. In addition to this 'The Pods' appear to have no ground clearance.



The lack of proper drainage – like that integral with the Hall – and the open location of the Kinnel Estate means they are at the mercy of the elements which in turn means because of its elevated location there is an increased risk of snow coverage which has to go somewhere when it melts.

The floor space of 'The Pods' removes the equivalent amount of natural drainage from the area. It also leaves the pods open to ROT.

In addition to which the increased weight of 'The Pods' and the foot traffic that is expected in the area associated with the development for 10/12 months of the year means there is an increased risk of collapse of known and unknown structures underground – such as the pipework for the fire hydrant system.

As the current owner purchased the site after the removal of the trees in that area.. The potential for subsidence due to unknown voids in the area is a risk to safety. There are more than one example of undocumented structures in the Estate!

BIODIVERSITY AND GEOLOGICAL CONSERVATION

Ever since Clarendon School for Girls was in residence from Easter 1948 there have been reports of bats flying around the building at night.

A survey carried out in 2021 confirmed there are at least 30 *Rhinolophus Hipposideros* - Lesser Horseshoe Bats and that they are not only nesting in the Cellars but there are clear signs that they are breeding in the Hall as well.

Their existence was known to the Auctioneers Lambert Smith Hampson in 2011. At this time they were in the roof void of the Chapel.

In January 2021 I submitted a Freedom of Information Act Request to Conwy Council in relation to the Hall and her last owners.

Amongst the papers I received in June 2021 was the following email: -

From: Paula Jones <Paula.Jones@conwy.gov.uk>

Sent: 14 March 2021 21:00

To: REDACTED

Subject: RE: Kinmel Hall

Thanks for the update

Although my knowledge of bats is limited my understanding is that they have a habit of inhabiting vacant buildings especially those with exposed roofs or windows where they can gain entry so it's possible they may have gained entry. It's probably wise to look at this now, as it is an offence to carry out works which could have affect a bat roost.

This is backed up by a letter from P A Hardwick in October 2008: -
There is a known maternity roost of lesser horseshoe bats, *Rhinolophus hipposideros* at Kinmel Hall. The existence of the maternity roost will require careful consideration when any works are carried out to the existing building as well as the impact of the proposed housing development upon foraging habitat. There is also the possibility or the loss of tree roosts of other species. These will all require careful consideration at the design stage.

And yet, the Ecology Survey carried out for the agent makes the following statement: -

3.1.7 There is evidence of a large population of rabbit on site. The habitat is very suitable for foraging bats, and the house is in a state of disrepair and therefore likely to support numbers of bats.

And: -

4.1.3 The walkover indicated that the woodland is heavily used by at least 4 species of bat (the record for Greater Horseshoe bat would need further evidence), suggesting there is a significant roost in the vicinity.

In 2021 a Survey was carried out by the Conservation Architect RECOMMENDED by Conwy Council to the then owners which included and ecology survey which recorded that there were at least 30 – 40 LESSER HORSESHOE BATS Nesting and Breeding in Kinmel Hall Cellars – as they have been since 1948 at least. NRW and North Wales Police have attempted to arrange for a FULL survey of the site but the owner will not give them access.

Under domestic legislation, lesser horseshoe bats are covered by the Wildlife and Countryside Act 1981 and any interference with them is a crime unless the proper licences are obtained.

Going further back in the History of the development of the Formal Gardens. William Andrews Nesfield brought in specimen plants from around the British Empire to create the gardens at Kinmel Hall.

Please see ['Long-ago Garden by John H Beckett 1967'](#)

He had as their backdrop the woodland surrounding the area called 'The Broadwalk' – this may have come from the other Landscaping project William and his two sons William Eden and Markham were working on at the same time, The Victorian Gardens within The Regents Park, making Kinmel Hall one of only two sites where the Nesfield Family worked on together.



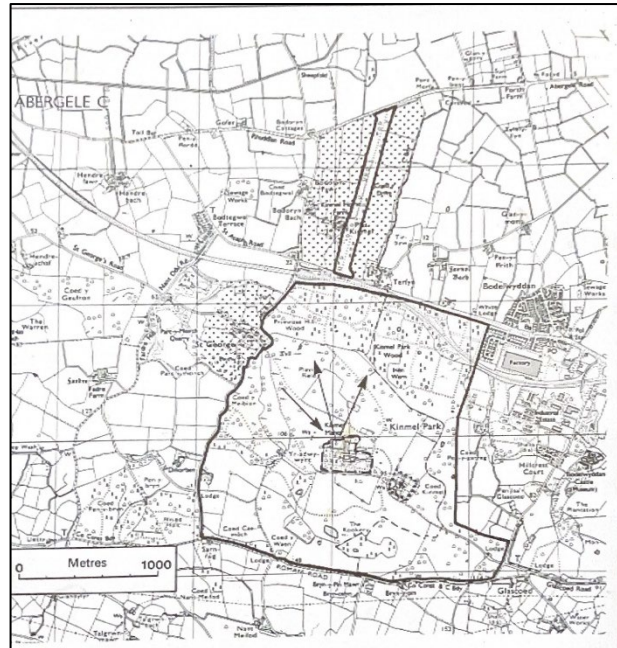
LOOKING NORTH ALONG
THE BROAD WALK,
REGENTS PARK



LOOKING EAST ALONG
THE BROAD WALK,
KINMEL HALL

The 'Broadwalk' within the grounds of Kinmel Hall is in reality the original Roman Road to Chester.

Its route was changed at the time of the creation of the current Hall by Hugh Robert Hughes who did not want a road going through HIS estate. He had it moved to the boundary of the Park



Sadly, the register of Specimens that was created for Eddy Vince by Caroline Kernan, whose parents lived in Hamilton House has disappeared into the mist.

As Caroline has stated: -

'Kinmel forms one in a series of major estates along the north coast of Wales and is one of W E Nesfield's major country houses. The house (Listed Building Grade 1); the list description states it is listed Grade 1 'because it is a building of major national importance for it's innovative style, by a leading British architect of the mid-late Victorian period.' It is also important for it's accompanying landscape and garden (Register of Landscapes, Parks & Gardens of Special Historic Interest in Wales, Grade 2) with a formal garden by W A Nesfield (known as the Venetian Garden), including the fountain and summer house and a good collection of trees reflecting the various stages of development of Kinmel Hall and now I understand for its Ancient Woodland.'*

We are aware that this application was submitted to the Council previously but was withdrawn by the owner. That application was submitted on Wednesday 2nd February 2022 – the same day the new Historical Environment Act came into force. This legislation introduces the Protection of Bio-diversity and subsequent Planning Applications must show that there is a bio-diversity net gain – which that application failed to cover, because it is stated that there

are NO protected species there was no reference to the protection of both Foraging habitat and or connectivity habitat for the Lesser Horseshoe Bats who have been in residence since World War 2.

In the application it is stated that: -

Pre-application Advice

Has pre-application advice been sought from the local planning authority about this application?

@Yes

Q No

If Yes, please complete the following information about the advice you were given (this will help the authority to deal with this application more efficiently):

Officer name

Title

First Name

Peter

Surname

Wood

Reference

Date (must be pre-application submission)

01/08/2021

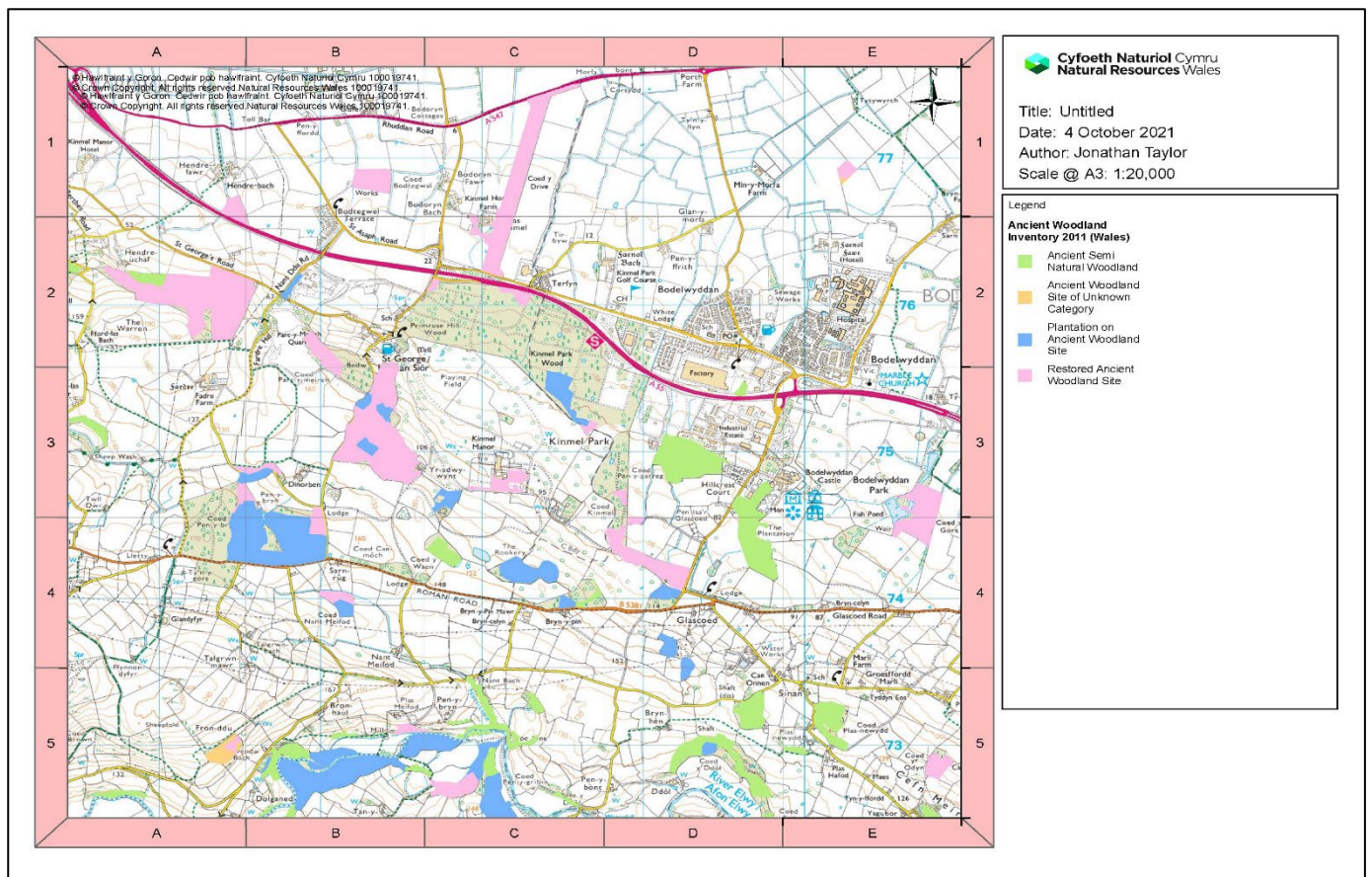
Details of the pre-application advice received

That the camping pods were removed from their initial location to the current location

I am aware of correspondence that exists between an Officer of the Council and a member of the public which reads as follows: -

'Hi [REDACTED] thanks for your email, can you confirm the status of the woods, for example is the map correct in that it shows it as ancient woodland, if so I can use that resource for other areas around Abergele.'

'To my knowledge it is correct, but it's not data we produce or hold so I don't know much about it I am afraid.'



This is from an Officer of the Planning Department whose job it is to be aware of the relevant legislation that affects areas they have responsibility for.

In addition to this, within the individual listed features within the grounds of the Hall you will find: -

Name of Property

Gates and Gate Piers at the West end of the Broad Walk

The Broad Walk is a landscape feature within the upper part of the gardens, South of Kinmel. The Walk extends in a straight line between the East and West gate of the garden boundary wall.

Exterior

Piers built of limestone. Channel rusticated piers with inset corners, rising to a half-round necking moulding and a wide moulded cornice, capped by a stilted ball finial set over a step. Plain iron gates with dog rails.

Name of Property

Walls and Gate Piers to the Venetian Garden at Kinmel, with 3 sets of steps

The formal sunken Venetian Garden lies in front of the rear, West elevation of Kinmel.

Description

Gardens, Parks and Urban Spaces

History

Laid out in c1870-75, probably to the design of Willian Andrews Nesfield, the famous Victorian landscape designer, in his later, simplified style, as part of the setting to his son's new design for Kinmel.

Exterior

Enclosing walls of 7 courses of red brick set on a stone plinth, and carrying a moulded stone coping, in all totalling c90cm high. Gate and gate piers on the long axis; alternate courses of brick and stone, terminating in ball finials. Steps on the same axis, and from the side terraces lead down to the sunken area of the garden.

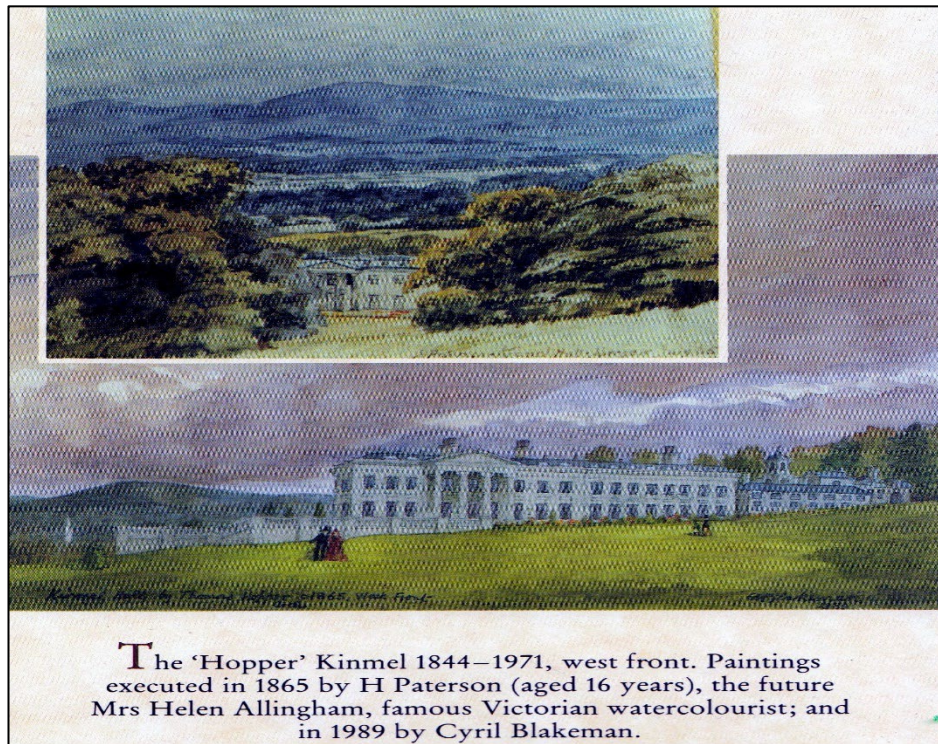
Reason for designation

Included as an important element in the setting of Kinmel, and for its interest as the work of the famous garden designer WA Nesfield.

Source: - CADW Full Report for Listed Buildings

If the boundary walls of the Venetian Gardens date from 1870 – 75 and the gates at the West End of the Broadwalk date from 1790 – 1810 then the boundary wall that links the two must be from one of these periods as no works to the grounds are recorded between these dates. Work was done on

the Hall in 1796 by Thomas Hopper but not the grounds which looked something like this: -



Source: - Kinmel Characters by Elaine Boxhall

If this is accepted as fact then the importance of the boundary wall of the Ancient Woodland is equally important as its neighbours at either end and, as such the close proximity of 'The Pods' is of serious concern to such an historic example of building skills of the time.

The highlighted text in the excerpt from the Application states that: -

That the camping pods were removed from their initial location
(In between the 1872 Yew Trees of the Venetian Gardens)
to the current location

More appropriate! On the Kinmel Estate West of the A55 there are only the following properties: - ADWY WYNT, GARDEN HOUSE, THE BUNGALOW, BOB'S COTTAGE – The wooden House at the Cross Roads, DINORBEN LODGE, ST GEORGE LODGE, KINMEL LODGE, HAMILTON HOUSE.

Only ONE of these is 'attached' to the site. Hamilton House is located at the South West corner of the grounds of the Hall. The Boundary Wall of her Gardens is the Boundary Wall of the Hall.



Even the Auctioneers photographs issued at time of the auction show the close proximity of Hamilton House to the grounds of the Hall.

Between 1995 – 2000 approximately 2 acres of land were taken back from the occupants of the Hall and this was fenced off and allowed to grow wild. This was to provide privacy for the then occupant of Hamilton House.

This fenced off area has since been cleared by the previous tenant and so the amount of privacy is unknown. The occupants of Hamilton House have been VERY vocal in their objections to this proposal.

In discussions with a member of the original management team that ran Kinmel Hall from 1978 – 2000 it has been confirmed that whilst there are no paved footpaths like the one to the swimming pool – there were informal pathways through the planting throughout the Broadwalk area right up to the

boundary walls of the Hall. There was even a pathway from Hamilton House that came out of this area onto the Broadwalk in line with the 'grassed over' pathway. This has been independently confirmed by a former Clarendon pupil who was at the school in the 60's

The placing of 'Pods' within a site of Historical Importance that carries triple protection in the form of: -

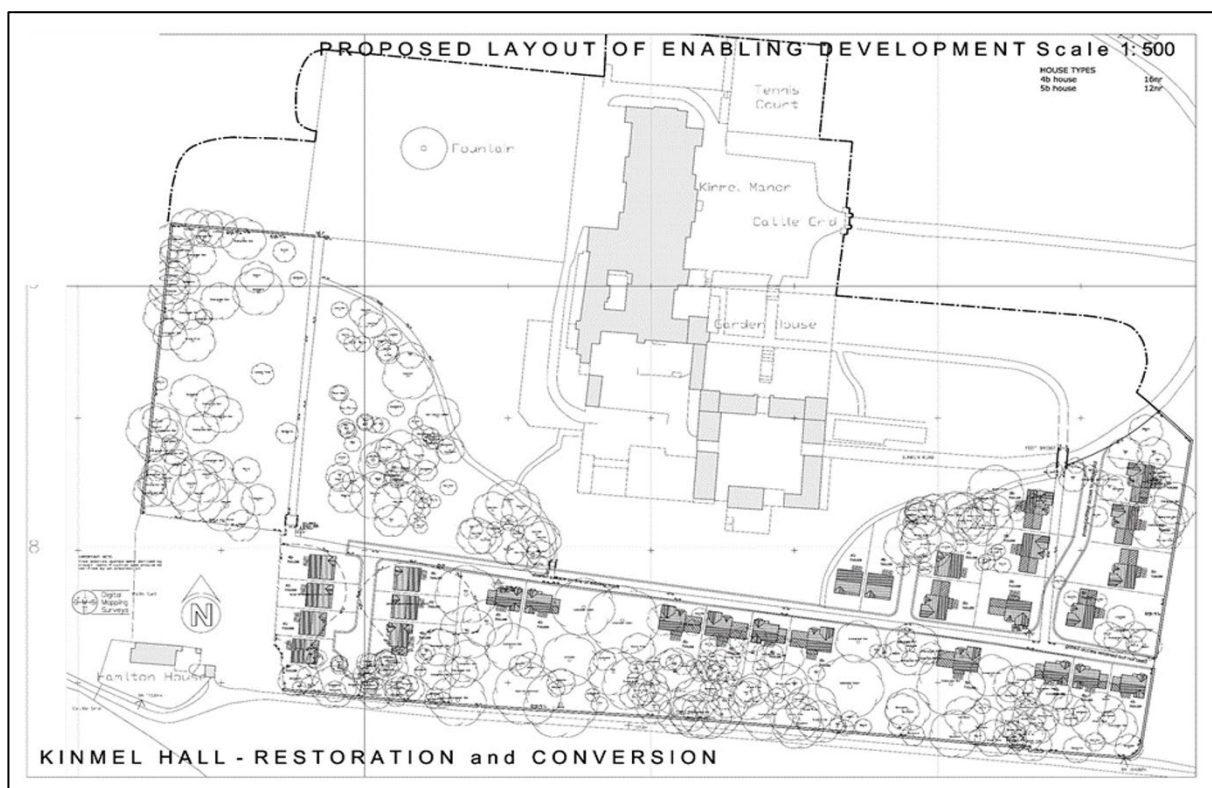
1. The 'Setting' and 'Curtilage' of the Grade 1 Listed Hall
2. The 'Setting' and 'Curtilage' of the Grade 2 Features within the grounds of the Hall
3. The 'Setting' and 'Curtilage' of the Grade 2* Parks and Gardens Register with its recently improved protection

Cannot be claimed to be 'enabling development' when the income generated from the project – even after 5 years – cannot cover the substantial estimated bill for restoration of the Grade 1 Listed Hall.

The fire damage caused in 1975 cost in excess of £10,000,000,00 between 1978 – 84, 40% of which was reimbursed from **Government Funds!**

The estimated repair bill for the Hall today stands at 7 times that amount and the 'Pods' cannot possibly generate sufficient income to cover these costs.

Plans drawn up by Derbyshire Investments to cover the restoration costs of the Hall in 2005 showed a more realistic form of 'enabling development'.



In response to this proposal, the then Development Control Manager Mr P A Hardwick wrote the following: -

'1. Previous discussions between your company and officers (including site visits) have identified the considerable sensitivities attached to any development that affects the setting of the Grade I Listed Hall, Grade II Listed Stables, Grade II Listed Kinmel Park and numerous listed features within the original estate.

The housing estate would introduce a significant level of development in close proximity to the Hall. The details submitted appear to comprise 4 and 5 bed detached houses that in layout and footprint do not reflect the character of the estate and associated buildings, The urban nature of such an estate would severely detract from the unique qualities of the hall and estate.

2. You have not provided an adequate justification for the proposed scheme. The proposal would have a significant detrimental impact on the setting of the listed building and is not commensurate with the focal vernacular of the hall and its setting. The level of anecdotal information on the need for enabling development is an insufficient basis for any meaningful consideration. Any package which links new development to works to the hall would need to include works, costs and development returns and would need to indicate methods to safeguard planning interests,

Another example of feasible Enabling Development is that which has been proposed by the owners of another Historic but neglected site in the area – The North Wales Hospital or Denbigh Asylum. Again, fortunately Kinmel Hall does not have the land it once had to consider this option.

Council Legislation on this matter states that: -

4.7.3.6 The inclusion of parks and gardens in the CADW/ICOMOS Register does not confer any extra statutory controls. (Unlike the Grade 2 listed status of certain features within the gardens and the Grade 1 Setting of the Hall)

New development which is proposed within or affecting the setting of a registered historic park and garden should not harm its special interest.

Enabling development proposals within historic landscapes, parks and gardens should be systematically assessed to ensure that the

special character of these assets are preserved. Development proposals which fall within registered historic landscapes, parks and gardens will be assessed against [Policy CTH/2](#), the Guide to Good Practice on using the Register of Landscapes of Historic Interest in Wales, the SPG on the Natural Environment, [Policy CTH/4](#) and the SPG on Enabling Development where relevant.

Source: - Policy CTH/2 – DEVELOPMENT AFFECTING HERITAGE ASSETS

The legislation goes on to state that: -

Policy CTH/4 – ENABLING DEVELOPMENT

- 1. Enabling development which seeks to secure the preservation and/or appropriate alternative use of a listed building, or a building which makes a significant positive contribution to the character of a conservation area, historic landscape or parks and gardens of special historic interest will only be permitted where the following criteria are all met:*
 - a. It will not materially harm the heritage values of the historic asset or its setting, - Damage has already been done due to mistakes on all sides but that does not mean the damage can continue with the Council's blessing*
 - b. It avoids detrimental fragmentation of management of the historic asset. The management of the Historic Grounds must be the priority over and above the limited income and potential long term damage to the grounds by allowing this application*
 - c. It will secure the long-term future of the historic asset and, where applicable, its continued use for a sympathetic purpose. The Long-term future of the Hall cannot be met by the income generated by 16 pods in 5 years. The Council Tax for the Hall would wipe out any income.*
 - d. It is necessary to resolve problems arising from the circumstances of the present owner, or the purchase price paid. His begs the question does the owner have the funds needed to restore the Hall which is his aim?*
 - e. Sufficient subsidy is not available from any other source. With the correct help and support the owner of the Hall can achieve his goal to restore the Hall and Grounds from income sources that are more acceptable to the Council and the community at large.*
 - f. It is demonstrated that the amount of enabling development is the minimum necessary to secure the future of the historic asset, and that its form minimizes harm to other public interests. The income generated from the pods cannot achieve this*

- g. *The public benefit of securing the future of the historic asset through such enabling development decisively outweighs the disbenefits of breaching other public policies.* The answer to this is simple. The potential wide scale damage resulting from this project cannot be assessed in advance and so it cannot be said to be of benefit to the local residents: -
<https://online-news.co.uk/news/glampers-are-pushing-out-campers-in-the-yorkshire-dales-councillors-warn.html>

2. *If it is decided by the Council that a scheme of enabling development meets all the criteria set out above, planning permission should then only be granted if:*

- a. *The impact of the development is precisely defined at the outset, normally through the granting of full, rather than outline, planning permission;* The impact of this development cannot be precisely defined at the outset because of the unknown number of architectural and historical features that are yet to be discovered in the Hall and its surroundings. The ornamental terracing under the road to the North of the Hall is only the tip of the Iceberg.
- b. *The achievement of the heritage objective is securely and enforceably linked to the enabling development;*

This is impossible to do because of the unknown costs yet to be discovered during the restoration of the Hall bearing in mind NONE of the restoration work carried out between 1978 – 84 or the retrospective work carried out in 1995 – 96 to lift the Section 10 Closure Order was carried out with LISTED PLANNING CONSENT!

- c. *The place concerned is repaired to an agreed standard, or the funds to do so made available, as early as possible in the course of the enabling development, ideally at the outset and certainly before completion or occupation.*

The income generation from the Pods cannot hope to cover the Hall restoration costs.

- d. *The Council closely monitors implementation, if necessary acting promptly to ensure that obligations are fulfilled.*

4.7.5.1 *Enabling development which conflicts with planning policies or sound conservation principles is often advanced as a measure which will allow a listed building or building of local importance to be preserved or rescued from dilapidation and/or disuse. **These buildings are frequently redundant, unused and possess large areas of surrounding land, including parks and gardens or landscapes that are themselves of special interest.***

Whilst the first part of the highlighted text is correct where Kinmel Hall is concerned. The second part is not. The Kinmel Estate was split at the time they bought back the Hall from Clarendon School in 1975-76.

When the 999 year lease was agreed with Eddy Vince the land he had access to was restricted to within the boundary walls of the Hall and access to the road to the Hall.

This, as previously stated, was further reduced when a section of land was bought back from that lease in the 1990's..

This means that, unlike Denbigh Asylum, Kinmel does not have extensive grounds on which to create 'enabling development'.

Development proposals should be considered and formulated with an understanding of the design and significance of buildings and their settings, parks and gardens and their relationship with the historic buildings that are located within and adjacent to them.

I hope that the information contained within this representation is sufficient to suggest that the Clients knowledge of his property and its relevant historic importance is not sufficient to warrant the proposal going forward.

I am also concerned that the apparent lethargy of the long-term employees of the Council and their stated ignorance of the relevant legislation warrants this proposal being stopped before more irreparable damage is done.

Policy TOU/2 – NEW SUSTAINABLE TOURISM AND RECREATIONAL DEVELOPMENT States that: -

1. New high quality sustainable tourism and recreational development within the Urban and Rural Development Strategy Areas will only be supported provided all the following criteria are met:

a. The proposal represents an all year-round high quality tourism offer which provides a range of tourism facilities and leisure activities;

No Mains Water Supply, No Conventional Toilets/Showers, No Mains Electricity, Unsafe vehicular access route, No Emergency Vehicle Access

b. The proposal is appropriate in scale and nature to its location and demonstrates resource efficient design;

The Council have objected to Colour Scheme. The Pods have been constructed off site not using resources from the Estate

c. The proposal is supported by evidence to demonstrate that there would be local employment benefits in terms of the number and range of jobs;

One part-time job role to cover 10 months 24 hour usage of the site!

- d. *The proposal is sustainably accessible and encourages the use of non-car based transport;*

The drive to the Hall is 1Mile in length and not suitable for walkers due to High Voltage Fencing and Farm Traffic

- e. *The proposal makes use of any suitable existing buildings in preference to new build and previously developed land in preference to greenfield sites, where appropriate;*

See point B above.

- f. *The proposal would not have an unacceptable adverse impact on occupiers of neighbouring properties;*

The Village of St George has not been consulted according to the Application and my own research. According to information supplied on the 14th September 2022:-

'We only notify those properties that are adjacent to the application site in this instance the application site boundary is the curtilage around the hall and it does not extend to Primrose Hill so those living in the village would not have been directly notified of the application however a site notice has been placed by the entrance on Primrose Hill.

The 'Curtilage' is defined by CADW NOT the Council! The Hall's Curtilage is, as detailed earlier.

One of the named properties consulted has been empty for over 12 months.

- g. *The proposal would support and extend the range of facilities on offer within the County; This is negligible considering the size of the County .*
- h. *The proposal would assist the Council's regeneration objectives of Conwy;*
- i. *The proposal meets other related policies in the Plan;*
- j. *The proposal would not appear obtrusive in the landscape and is accompanied by a **detailed landscaping scheme and, where appropriate, a Landscape and Visual Impact Assessment.** No Landscaping scheme has been detailed and no impact assessment has been produced*

2. *New **high quality ???** holiday accommodation will only be supported where it forms an ancillary or complementary part of an existing or proposed new tourism development scheme and meets all of criteria 1 a) – j) above. There will be a presumption against the*

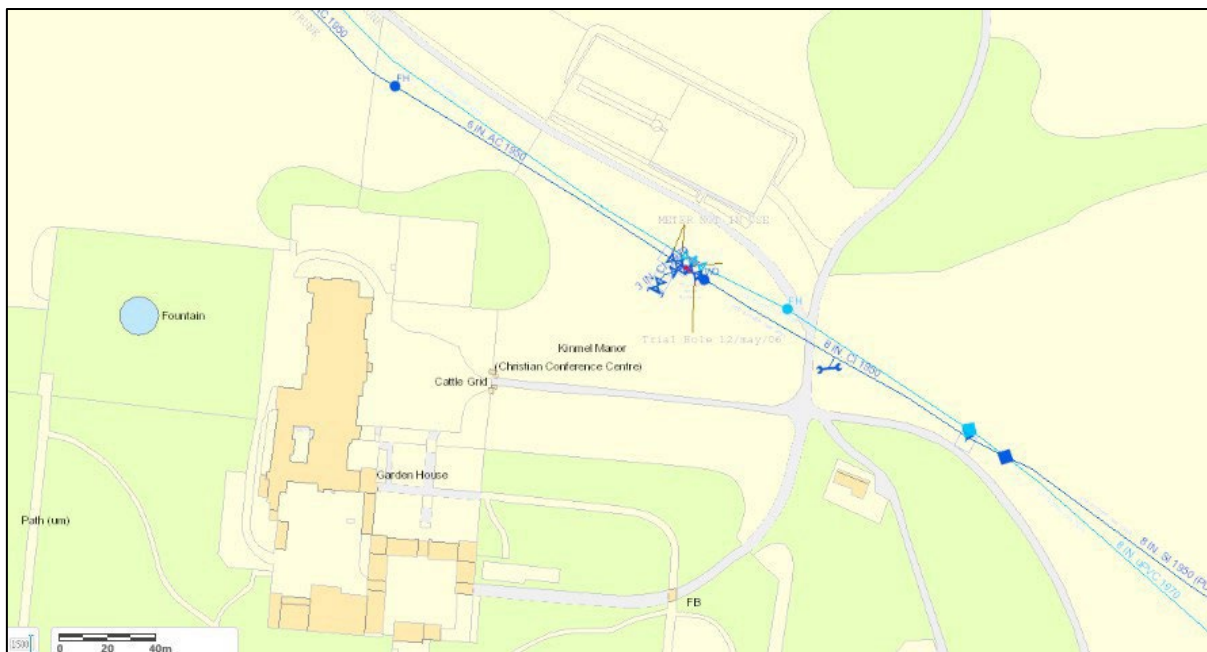
development of new static caravan sites. IF this application is allowed caravans on the forecourt could be next as one has been allowed in recent years!

The Water and Electricity plans are below.

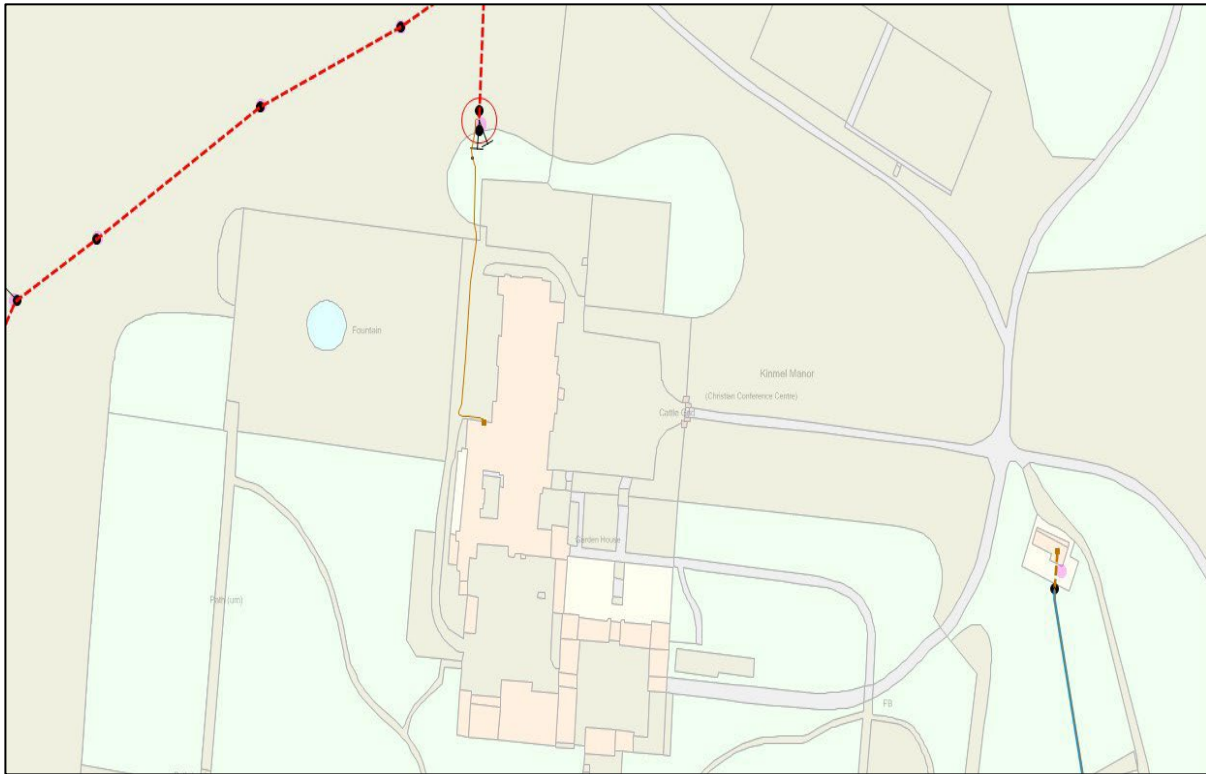
The reason I have included these is because, in this day and age, even when we are on holiday, we still have a need for Electricity and a basic water supply.

Where is the supply of these to the 'Composting Toilet' for washing and the Pods for the likes of phone chargers coming from because there is NO access from either mains supply that comes anywhere near the proposed site.

There is no vehicle access to the proposed site and so a bowser is not an option and any mains electricity supply from the cellars of the Hall would have to go through a transformer which would need to be attached to a currently non-existent telegraph pole near the site which is within close proximity to the Ancient Woodland.

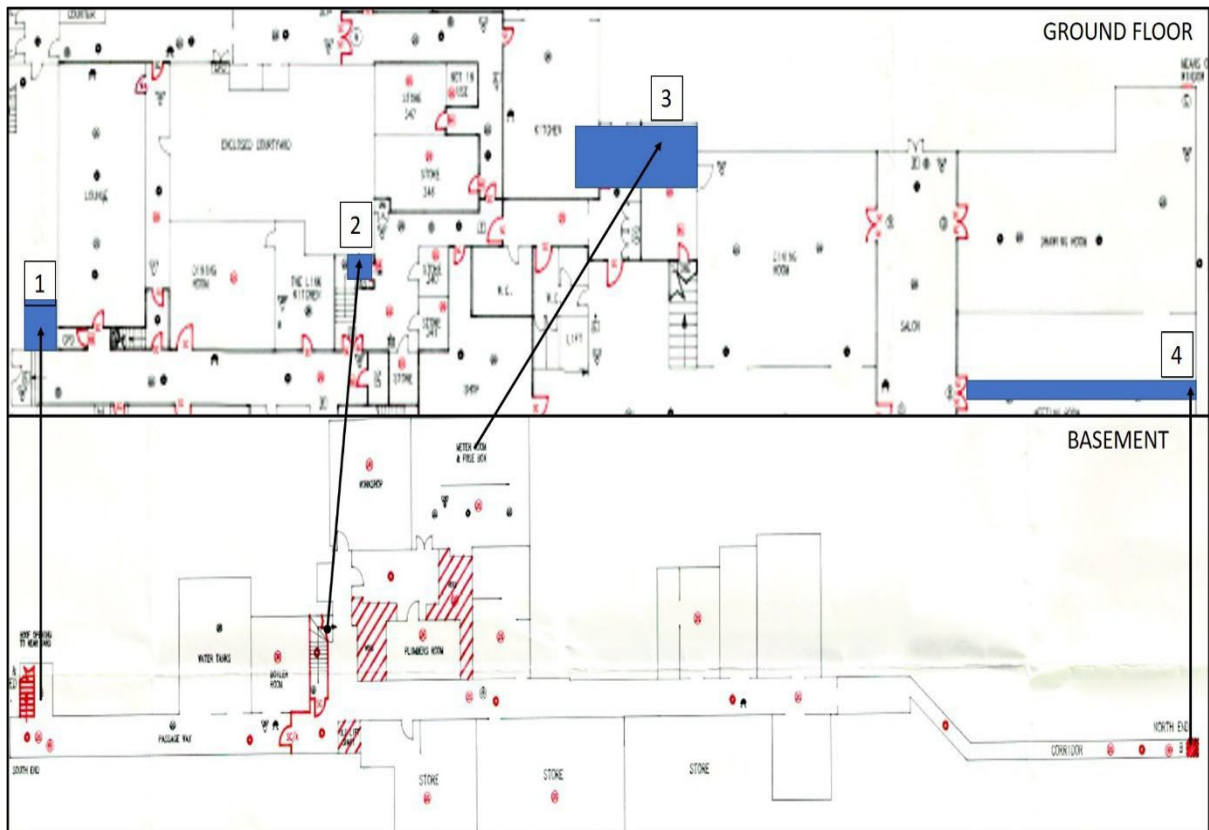


WATER SUPPLY



SPENERGY SUPPLY

LOCATION OF WATER AND ELECTRIC SUPPLIES
ENTERING THE HALL AND REFERENCE POINTS



Returning to the Application form. The form asks about Employment and any prospective new employees. The client has stated that only one Part Time employee will be needed for this venture.

Because of the current condition of the Hall internally: -



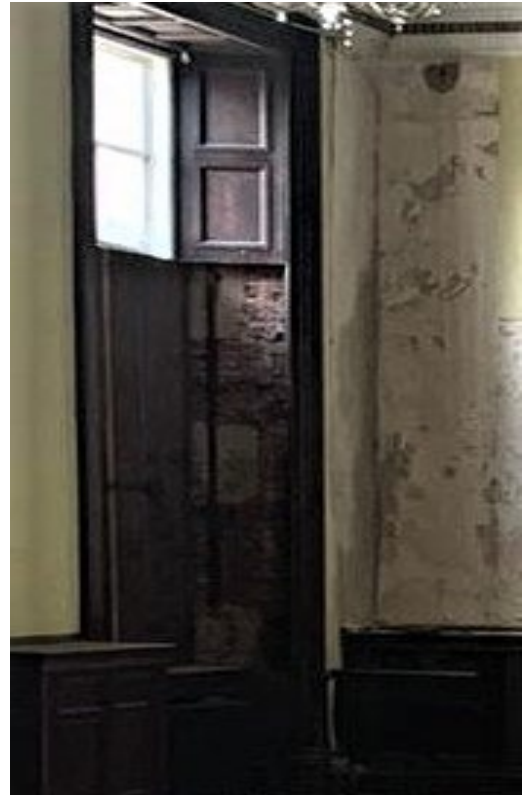
Which includes missing and or damaged pipework: -



2011



2021



The pipe shown in the photos of 2011 above control the supply of water to the Central Heating Systems upstairs. The two Stop Taps meant the supply could be turned off when the upper floors were not being used.

These pipes disappeared between 2019 and 2021! The time the Polish Workers were on site and the fire escapes from around the Hall also vanished!

This sort of damage means that a mains water supply to the Hall is not an option at the moment.

It also means that the probability of anyone living in the Hall is unlikely because they would need water.

If no one is living at the Hall, then the need for security on site is paramount because of the potential risks incurred by visitors to the site.

24 Hour Security would require 3x7 hour shifts a day during the week and two 12 hour shifts at weekends. The costs incurred with this security would negate any potential income from the pods.

Knowing the Hall as I do, security is a requirement of the Insurance Cover for the Hall as that is why I lived at Kinmel in the 90's!

There is also no mention of any firefighting provision on the site.

On the Planning Application it asks about Public Consultation and the owner of the Hall has answered that he has not sought the views of the local residents in St George.

An earlier application to set up a travellers camp on ground opposite the Golden Lodge raised a considerable amount of opposition from not just neighbours to the site – which included the residents of St George!

Access to the Hall is legally obtained via the drive from Primrose Hill at a distance of 1 Mile from the gates to the site owned by the applicant.

Access to the Hall is also obtained via the driveways from Glas Coed Drive and St George. Sadly, an ornamental set of gates is no deterrent to the determined individual set on gaining access to the site – there are plenty of examples online from Urban Guerrillas who have gained access to the Hall despite these and other deterrents being in place: -

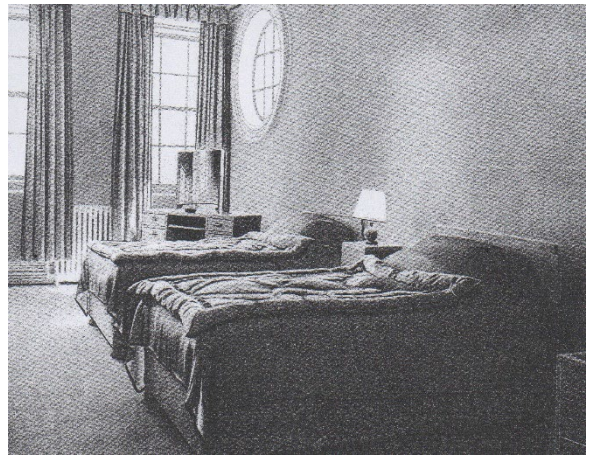
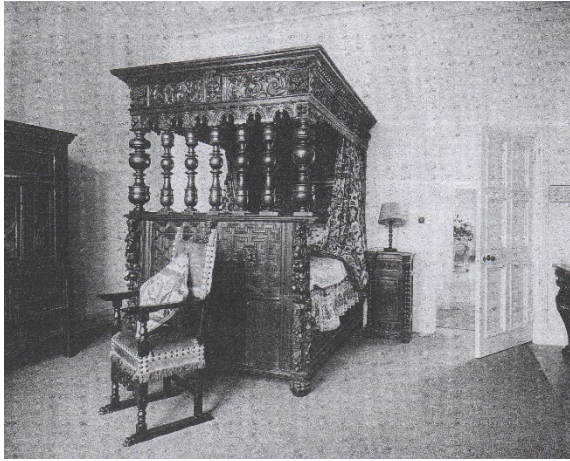


Hotels such as The Kinmel & Kinspa can expect a certain class of clientele because of the standard of accommodation and service they offer.

Similarly locations such as your national holiday companies that offer Hi De Hi style chalets can expect a certain class of guests.

Wooden Pods with a bench for a bed can expect ?

The accommodation that was provided at Kinmel Hall when it was last a designated Hotel looked something like this: -



Even when the Conference Centre was at the Hall it offered a certain level of accommodation: -



Whilst budget accommodation it offered a level of comfort not offered by 'The Pods'.

<https://online-news.co.uk/news/glampers-are-pushing-out-campers-in-the-yorkshire-dales-councillors-warn.html>

Allowing this application to progress degrades the standing of an already neglected Mansion which can still be brought back to life with the right type of investment.

In closing may I draw your attention to the following statement: -

'The Historic Buildings Council for Wales, of which I have the honour to be chairman, has the statutory duty, amongst others, of advising the Secretary of State on the giving of grants for structural repairs to owners of outstanding historic buildings. After the awful fire at Kinmel we were all in despair.

Here was one of Britain's (not just Wales's) greatest and largest Victorian country houses - a veritable palace and an architectural gem - in real danger of decay and demolition. the lack of an owner with a potential use in mind, and, just as vital, the means to effect the extensive and expensive repairs which were essential, seemed as inevitable as anything in this world.

I recollect that before the fire Clarendon School had applied for grant-aid towards the repairs necessary to just some of William Eden Nesfield's splendid chimneys. The sums required for these alone were enormous. How much vaster, then, was to be the cost of the post-fire structural costs!

On top of these, of course, was the expense of interior decoration and all the large variety of works which, under the Historic Buildings Act of 1953, would not qualify for grant. The amount of taxpayers money available for assistance to all the eligible historic buildings in the Principality is, naturally, limited.

Nevertheless the tremendous importance of Kinmel architecturally and the wonderful enthusiasm and competence of its new owner, ensured that something approaching 40% of all structural repairs would be made available over the years. Not only is a very important part of Britain's heritage saved from extinction, but its new uses are eminently excellent both from a spiritual and a social point of view.

In all my thirty years of service on the Historic Buildings Council for Wales, I can honestly say that none of our numerous tasks of rescue and revival, repair and restitution has given me such profound satisfaction and joy. Working in close partnership with Eddy Vince on his great project has been a prodigious privilege for all the Council's members and for the Welsh Office staff - especially the architectural assessor, Douglas Hogg.

**To have been participants in a miracle of this nature
makes one at once humble and proud.'**

*Source: - The Marquees of Anglesey
DL FSA FRHistS HonFRIBA FRSL.*

Circa 1978

Is it right that we should allow all this heritage and hard work be lost for the sake of 16 wooden huts?!

I hereby request that the Planning Committee of Conwy Council take the points raised in this document into serious consideration and reject the application outright because I have grave concerns about the preservation of the Historic Value of the Site

Yours sincerely,

Paul Hughes
Founder and Chairman of
The Friends of Kinmel Hall
[Honorary Historian for Kinmel Hall](#)
Owner and Curator of
[The Medical Memories Roadshow](#)

Planning Department
Conwy Borough County Council
PO Box 1
Conwy
LL30 9GN

**CONWY COUNTY BOROUGH
COUNCIL
DEVELOPMENT CONTROL**

RECEIVED: 11/10/2022
APPLICATION NO: 0/50004

11th October 2022



Ymddiriedolaeth Natur
Gogledd Cymru
North Wales
Wildlife Trust

Planning Reference Number: 0/50004

Proposal: Siting of 16 camping pods and compost toilet for a temporary period of time (6 years)

Location: Kinmel Hall, Kinmel Park, Primrose Hill, St George, LL22 9DA

The North Wales Wildlife Trust objects to the above development.

The Preliminary Environmental Assessment is inadequate to properly assess the potential environmental impacts that this development might cause, as outlined below.

1. No comprehensive bat roost and emergence surveys were undertaken so assessment of the how the development might affect bat roosts or flight paths has not been undertaken. This means that the impact of the development on the long-term conservation status of the bats at the site was not undertaken, contrary to the Conservation of Habitats and Species Regulations 2017.
2. Not enough detail has been provided on the placement of the camping pods. There are no details as to how they will be sited, what works would be required for this, nor any details about artificial lighting proposals. This means that a satisfactory assessment of their impact upon the biodiversity of this site has not been undertaken.
3. Great Crested Newt has not been considered in the PEA and as a European Protected Species that is known to exist in proximity to the site, potentially damaging impacts need to be considered.
4. No adequate assessment of the impact of the pods or related activity upon the Restored Ancient Woodland has been undertaken so biodiversity impact cannot be adequately assessed.

northwaleswildlifetrust.org.uk

Prif Swyddfa:

Llys Garth, Ffordd Garth,
Bangor, Gwynedd, LL57 2RT

Swyddfa Dwyrain:

Aberduna, Ffordd Maeshafn,
Maeshafn, Sir Ddinbych,
CH7 5LD

Head Office:

Llys Garth, Garth Road,
Bangor, Gwynedd, LL57 2RT

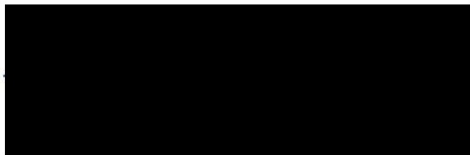
East Office:

Aberduna, Maeshafn Road,
Maeshafn, Denbighshire,
CH7 5LD

In addition to the above, the application does not appear to include measures to achieve Net Biodiversity Benefit, which is now a compulsory requirement of all developments in Wales.

If you require any further information or clarification, please feel free to contact me.

Yours faithfully,



Adrian Lloyd Jones
Living Landscapes Manager

northwaleswildlifetrust.org.uk



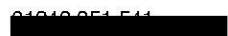
Prif Swyddfa:

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Swyddfa Dwyrain:

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CH7 5LD



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East Office:

Aberduna, Maeshafn Road,
Maeshafn, Denbighshire,
CH7 5LD





**Cyfoeth
Naturiol
Cymru
Natural
Resources
Wales**



Ein cyf/Our ref: CAS-198501-L3J9
Eich cyf/Your ref: 0/50004

Maes Y Ffynnon,
Penrhosgarnedd,
Bangor,
Gwynedd
LL572DW

Conwy County Borough Council,
PO Box 1,
Conwy,
LL30 9GN

ebost/email:
northplanning@cyfoethnaturiolcymru.gov.uk

28/09/2022

Annwyl Syr/Madam / Dear Sir/Madam,

BWRIAD / PROPOSAL: GOSOD 16 O BODIAU GWERSYLLA A TOILED COMPOST AM GYFNOD DROS DRO (6 MLYNEDD) / SITING OF 16 CAMPING PODS AND COMPOST TOILET FOR A TEMPORARY PERIOD OF TIME (6 YEARS)

LLEOLIAD / LOCATION: KINMEL HALL, KINMEL PARK, PRIMROSE HILL, ST GEORGE, LL22 9DA

Thank you for consulting Cyfoeth Naturiol Cymru / Natural Resources Wales about the above, which we received on 07/09/2022.

We have concerns with the application as submitted because inadequate information has been provided in support of the proposal. To overcome these concerns, you should seek further information from the applicant regarding protected species. If this information is not provided, we would object to this planning application. Further details are provided below.

Protected Species

- Bats

We note that the ecological report submitted in support of the above application (Birch, R. (2022). Preliminary Ecological Appraisal (PEA) of proposals to Erect 16 camping Ponds on land at Kinmel Hall, Bodelwyddan, Denbighshire. Ecoscope. (Unpublished Report No ECO_832)) has identified that bats may be present at the application site. From the information submitted, we consider that the proposed development is likely to represent a **higher risk for bats, as defined in our guidance document 'Natural Resources Wales Approach to Bats and Planning (2015)'**.

Bats and their breeding and resting places are protected under the Conservation of Habitats and Species Regulations 2017. Where bats are present and a development proposal is likely to contravene the legal protection, they are afforded, the development may only proceed under licence issued by Natural Resources Wales, having satisfied the three tests set out in the Regulations (Please also refer to Paragraph 6.3.7 of Technical Advice Note 5: Nature

Conservation and Planning). Please note, for the purposes of providing advice at the planning application stage, our comments are limited to the test relating to “*demonstration of no detriment to the maintenance of the favourable conservation status of European protected species*”.

Although the ecological report has been submitted, we advise that there is insufficient information to assess potential effects on bats, and how any effects will be avoided or mitigated.

From the report it is noted that common and soprano pipistrelle, lesser horseshoe and possibly greater horseshoe bats are using the application site. We note Section 4.1.3 of the ecological report states ***“The walkover indicated that the woodland is heavily used by at least 4 species of bat – (the Greater Horseshoe Bat would need further evidencing) suggesting there is a significant roost in the vicinity.”*** We, therefore, agree that further assessment is required in respect of greater horseshoe.

- Great Crested Newt

We note the ecological report does not consider great crested newt (GCN). We advise that consideration should be given to GCN in any subsequent revisions to the report.

In the meantime, we are unable to give you any assurance that the proposal would not be likely to be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in its natural range.

Foul Drainage

We recognise that well designed compost toilets can reduce water usage and provide an output that is suitable for use as a fertiliser. Both permanently sited and portable compost toilets can be defined as a septic tank provided the design of the system separates the urine and sanitary waste from the solids. In these systems a carbon source such as sawdust or wood shavings should be added to reduce odour and aid the degradation process. The resultant treated material can be spread on land as a fertiliser in accordance with Sludge Use in Agriculture Regulations, the Safe Sludge Matrix, and the Code of Good Agricultural Practice (COGAP). The separated liquid fraction can be discharged to land or stored in a sealed tank and collected by a waste contractor for disposal at a Wastewater Treatment Works. Where a discharge to land or water is being made and exemption or environmental permit will be required. Householders should dispose of the sanitary waste fraction via their local authority black bag collections or by a waste contractor.

Any compost toilet that does not separate solids and liquids is considered to be a cesspool and should have the resultant waste collected by a waste contractor for disposal at an appropriately permitted site and should not be applied to land.

Ancient Woodland

Our standing advice to all planning proposals that may affect (directly or indirectly) ancient woodland can be found at [Natural Resources Wales / Advice to planning authorities considering proposals affecting ancient woodland](#).

Other Matters

Our comments above only relate specifically to matters included on our checklist, *Development Planning Advisory Service: Consultation Topics* (September 2018), which is published on our [website](#). We have not considered potential effects on other matters and do not rule out the potential for the proposed development to affect other interests.

We advise the applicant that, in addition to planning permission, it is their responsibility to ensure they secure all other permits/consents/licences relevant to their development. Please refer to our [website](#) for further details.

If you have any queries on the above, please do not hesitate to contact us.

Yn gywir / Yours faithfully

Siôn M. Williams

Cynghorydd - Cynllunio Datblygu / Advisor - Development Planning

Cyfoeth Naturiol Cymru / Natural Resources Wales

Julia Anne Jones

From: [REDACTED]
Sent: 13 September 2022 15:07
To: CynllunioPlanning
Cc: [REDACTED]
Subject: Kinmel Park, Kinmel Hall Planning Application No. 0/50004

This Message Is From an External Sender

This message came from outside your organization.

Dear Madam,

Re; Kinmel Park, Kinmel Hall. Application No. 0/50004 By Mr. Cryer

I am grateful to you for letting me know of the above mentioned planning application and would urge the Council to **REFUSE CONSENT** upon the following grounds:

- (1) The placing of any such camping pods at Kinmel is highly inappropriate and unsympathetic to such an important listed heritage site and greatly demeaning to the building itself and to its surrounding curtilage in this particular context. It would be greatly demeaning to Wales too, if such an important internationally known site were to gain approval for proposals that are little short of being bizarre, and which show no respect whatever to the property's high heritage listed status.
- (2) The ground works involved would inevitably harm the listed garden which is of international as well as local importance, and is protected by statute from such harmful proposals.
- (3) The proposals are thus contrary to the Council's written policies for the safeguarding and conservation of the Welsh National Heritage items in its area.
- (4) The proposals are also contrary to Cadw's written policies for such high status heritage items.
- (5) Kinmel Hall and its curtilage surroundings are in desperate need for a recognised sympathetic heritage use, properly funded, but this application cannot possibly fall into such a category. In fact it would compound the existing problems by encouraging a use that is wholly contrary to written policies, and which could in turn give rise to other related inappropriate applications in the future which may then be difficult to resist, on the back of this application having already been given consent.
- (5) The granting of consent under such circumstances would amount to an administrative absurdity in my view, and should therefore be refused.

I write these observations as a former member of WHBC, a former trustee of the Georgian Group, a past Chairman of the WHGT, a past Chairman of the Welsh Region of H. H. and as the rescuer of Trevor Hall (Llangollen) and Hendre House (Llanrwst), amongst other things. I would therefore respectfully urge the Council to **REFUSE CONSENT** to this application and thus not be a party to a completely flawed approach to the wider rescue of one of Wales most important properties which is currently listed at risk of being lost to future generations. To my mind the solution here is for all concerned to contribute to an international search for an owner with sympathy, vision and funding that can undertake an appropriate long term rescue operation for the overall benefit of the Welsh Heritage. This cannot possibly be said for this particular application.

I remain yours truly and faithfully,

Michael Tree.

Nant-Iago,

Llanfair Waterdine
Knighton,
Powys
LD7 1TS

**CONWY COUNTY BOROUGH
COUNCIL
DEVELOPMENT CONTROL**

RECEIVED: 13/09/2022

APPLICATION NO: 0/50004

Tanya Meerally

From: Glynis Shaw [REDACTED]
Sent: 05 October 2022 12:12
To: ruth.has.evans@conwy.gov; CynllunioPlanning
Cc: Sarah Green; Lisa Fiddes; Joanna Davidson; Elaine Davey; Prue Probert; Margie Hoffnung
Subject: 0/50004 Kinmel Park, Kinmel Hall Primrose Hill St George LL22 9DA

This Message Is From an External Sender

This message came from outside your organization.

FAO Ruth Evans

Thank you for consulting with the Welsh historic Gardens Trust on the proposed siting of 16 camping pods and compost toilet for a temporary period of time (6 years) at Kinmel Hall

The WHGT objection has not changed since the withdrawn application earlier this year.

The proposed change of land use fails to protect or enhance important heritage assets - and fails to recognise the importance of the Nesfield landscaping of the Pleasure Gardens around the house beyond the Venetian Garden

Kinmel garden is a site on the now Statutory Register which means it should be protected from exactly this kind of development. Allowing such a scheme over 6 years will set a dangerous precedent unlikely to be ended or in the public interest.

This landscape is an important example of its period that embodies the taste and ideals of the Hughes of Kinmel and especially Lady Florentia Hughes (1828-1909), a favourite of Queen Victoria. Florentia introduced the court taste in garden design to North Wales. Not only did the Hughes create a remarkable house, they also created a remarkable landscape.

The Kinmel Park landscape is an entirely inappropriate site for a camping / pod enterprise as it was laid out by the famed William Andrews Nesfield and his son Arthur Markham Nesfield to complement the house remodelled by William Eden Nesfield. Kinmel is a particularly rare example where all three Nesfields worked together on a single site (the other being Regent's Park), creating a special unity of landscape and architecture.

To fragment the landscaping with a camping site would degrade the quality of this historic asset as a whole.

Siting the 16 pods in the Picturesque Shrubbery with sloping walks and drives as shown on the 1st Edition OS map will interfere with the original landscaping.

The original planting included species from all over the Empire in a landscape style developed by Arthur Markham in the Coliseum Gardens and planting plans for the Avenue Gardens in Regent's Park. From the 1860s until his untimely death, it was said that Arthur Markham enjoyed the largest reputation of any garden designer of his generation (*Brent Elliott, Victorian Gardens: Batsford Ltd 1986 p 144*).

Arthur working with his famous father William Andrews Nesfield, who was advisor to the London Parks and laid out the arboretum at Kew, designed the Venetian Garden at Kinmel and would have been instrumental in ensuring that Kinmel had exceptional planting with both evergreen and deciduous foliage plants together with the exotic specimens newly arriving in the country. The landscaping included designed routes with vistas in the gardens West and South surrounding the house and stable block.

An Environmental Impact Assessment, a proper tree / shrub audit and a detailed Heritage Impact Assessment of the site should be completed before any development is considered. Felling of trees and grubbing up of shrubs may not only cause

the loss of rarities but damage an ecology established since the nineteenth century as well as destroy what might be saved of the original landscaping.

The historic significance of this site with the involvement of exceptional landscape designers means that the entire registered landscape should be restored and conserved rather than being sacrificed for roof repairs. Protecting the Venetian garden and abandoning the less formal but extensive shrubbery would be like protecting the terraces at Bodnant and disregarding the Dell. The paths from the one lead to the other and in both cases the whole landscape is designed to provide varied aesthetic and sensory experiences.

With current interest in gardens, a restored garden could be an enabling development to secure funding for long term repair to the house - as at Aberglasney. Lowther Castle is another site where the gardens survive around a ruined building

WHGT would like to support an application to HLF to secure this special site which should have a Conservation Management Plan to conserve and restore what was once an outstanding landscape.

WHGT Clwyd strongly objects to this planning application for pods on the Grade II* site.

There is no evidence that this enabling development can secure the future conservation of the house, but it is certain that it will degrade and damage the setting to a grade I property and desecrate an area of a grade II* garden.

Glynis Shaw (WHGT Clwyd)



CynllunioPlanning

From: Rhian S. Davies (Pollution)
Sent: 20 September 2022 11:50
To: Ruth Haf Evans; CynllunioPlanning
Subject: 0/50004. Kinmel Hall, St George, LL22 9DA

Good Morning Ruth

Thank you for consulting me on application 0/50004. Kinmel Hall, St George, LL22 9DA.

As previously commented by Huw Williams, on application 0/49367, the applicant has not provided sufficient information for the application to be informatively examined and therefore I would recommend refusal.

The applicant is recommended to provide the following details:

- 1 spacing between the pods
- 2 roadways and footpaths to the pods (in particular having regard to access for firefighting appliance(s))
- 3 fire points and firefighting equipment
- 4 lighting for the site
- 5 waste water (grey water) disposal
- 6 location of potable water supply
- 7 washing facilities
- 8 cooking facilities
- 9 refuse disposal
- 10 ratio of toilet and wash hand facilities to occupancy of pods.

Regards

Rhian Davies

Uwch Swyddog Iechyd Yr Amgylchedd (Llygredd) / Senior Environmental Health Officer (Pollution)
Gwasanaethau Gwarchod y Cyhoedd / Public Protection Services
Cyngor Bwrdeistref Sirol CONWY County Borough Council
E-bost / E-mail : rhian.s.davies@conwy.gov.uk

Julia Anne Jones

From: Pauline Watkins [REDACTED]
Sent: 12 September 2022 13:53
To: CynllunioPlanning
Subject: objection to application no 0/50004
Attachments: KH PODS 1.jpg; KH PODS 3.jpg; KH PODS 4.jpg; 1A.pdf

This Message Is From an External Sender

This message came from outside your organization.

Please find below our objection to planning application reference 0/50004. We would also like you to register our wish to speak at any relevant Planning Committee meeting.

Yours faithfully

Pauline & Shaun Watkins

Hamilton House
Kinmel Park
St. George
LL22 9DA

**CONWY COUNTY BOROUGH
COUNCIL
DEVELOPMENT CONTROL**

RECEIVED: 12/09/2022

APPLICATION NO: 0/50004

12th September 2022

Objection to planning application no. 0/50004

Kinmel Hall Kinmel Park Primrose Hill St George LL22 9DA

Application to operate a campsite consisting of 16 camping pods within the gardens of Kinmel Hall.

Once again, we must submit our objections to these plans. The only differences to the previous application reference 0/49367 is the inclusion of a Preliminary Ecological Assessment and the applicant has not seen it necessary to submit any form of supporting statement. There is no effort to address the numerous objections raised in the first application. We therefore see this new application as pointless and vexatious.

We have lived at Hamilton House for over 8 years. Hamilton house lies within Kinmel Hall's old garden boundary. We have attached a copy of the site plan which shows exactly where the pods will be in relation to our home and garden. (See attachment 1A)

There are a number of reasons why we are objecting to this proposal. They include material objections and the impact such a development will have on ourselves and the local community. As the campsite was operating during the summer of 2021 we do not have to speculate as to the effect this campsite will have or how it will be

managed. We have already suffered the impact of people using the pods and have communicated with the council and other relevant organisations on a number of occasions throughout the period when the campsite was running.

We also wish to point out that the siting of the pods and the operation of the campsite is contrary to Planning policy and the Historic Environment (Wales) Act 2016. We will also show why the argument that profits from operating the campsite will fund the restoration of the Hall and Gardens is unfeasible.

We will endeavour to be concise but would expect you to appreciate the number of valid objections we have and the enormous impact this development has already had on our lives.

Our material objections are:

Loss of Privacy

The pods are within yards of our garden boundary. The pods are clearly visible from our home and garden. The campers are allowed to wander through Kinmel Hall garden and last summer often stood by the garden fence staring into our garden. They can also see into our kitchen and bathroom. One of the main reasons we moved to Hamilton house was to enjoy the tranquil privacy and we have spent years turning the garden into an area for quiet enjoyment. When the campsite was operating last summer, we often had to leave the garden and have decided not to maintain the areas nearest to the pods.

Disturbance

Even when the pods were situated in the Venetian Garden and further from our home the level of noise was objectionable. Now the pods are by the boundary fence it is not unreasonable to expect the noise level to be intolerable. It is not difficult to imagine the amount of noise up to 32 holidaymaking campers along with their dogs and vehicles will make. The campers are also permitted to have barbeques and campfires. Even when the pods were further away from our home the sky would be obliterated with smoke from the fires. On some summer evenings we had to ensure all our doors and windows were tightly shut as the smoke would penetrate the house and, on these evenings, using the garden was out of the question.

The idea that 32 people could share a single compost lavatory is impractical and the consequences of this are obvious.

It is worth pointing out that the proposal clearly shows that the pods will be closer to our home than the Hall itself and will have a greater impact on us than on the owners. Now that the pods are right by the boundary fence no sane person could tolerate the noise, smoke and general disturbance caused by living so close to a campsite for 10 months each year. Therefore, Hamilton house would be uninhabitable.

Access

Kinmel Hall shares a long single lane drive with the other residents of the park. This drive is also used by the dairy situated to the south of the site. The increase in traffic would be considerable. The residents have already had to deal with numerous vehicles driving around the estate trying to locate the campsite when it was operating last year. There will also be a considerable increase in traffic noise as the proposed parking site will be a lot closer to Hamilton house.

Impact on the Area

The garish pods are visible from the park as well as our home. St. George is a quiet rural village. Kinmel park is a beautiful, historic park and the impact of gangs of transient campers along with their vehicles and dogs cannot be underestimated.

To say that the site will be temporary does not mean it will not have a permanent impact on the area. I have attached an image posted on social media of one of the visitors enjoying a bottle of whiskey by a campfire. (See attachments KH PODS 1 and KH PODS 3) This is by beautiful, old specimen trees and listed buildings. The potential for a fire to get out of control is obvious. There is also considerable opportunity for malicious damage. As the site is very close to our garden and there are many overhanging trees and shrubs there is a very real danger that any fire could quickly spread to our garden and home.

The entire garden at Kinmel Hall including the area where the camping pods are situated is subject to a Tree Preservation Order. This means it is an offence to wilfully damage or destroy a tree without the planning authority's permission. To imply that allowing campers to light fires and barbeques beneath these trees is not going to cause any damage is simply ridiculous.

The area that was bulldozed away to clear the area for the pods used to be covered in a swathe of extraordinary daffodils. Although we do not claim to be expert botanists some of the specimens were very unusual and were either old Victorian varieties or rare hybrids developed by the Kinmel gardeners many years ago. During the spring it looked like a yellow and gold river running down the slope towards the Venetian gardens and their scent could be detected from quite a distance. This glorious display has now been cleared and replaced with jarring pods, campers, campfires and all the detritus that is inevitable.

A number of objections to the previous application referred to the bats roosting in the house and gardens. These are mentioned in the Preliminary Ecological Assessment but it is now very obvious that their numbers are greatly reduced. This is probably due to the owners of Kinmel Hall using commercial speakers to blast music out at such a level that the floorboards in our home vibrate.

Further to the points listed above which mainly detail the impact the campsite has on ourselves we wish the planning committee to consider the following which are all contrary to either planning or CADW regulations.

The pods are on an historic listed site. They are garishly coloured and not in harmony with the surrounding area.

The pods are within the curtilage of a grade 1 listed building.

The owners have operated and are applying to continue to operate a campsite on a grade 2 listed site.

The owners have operated and are applying to continue to operate a campsite within the curtilage of a grade 1 listed building.

If listed building consent is required for the simple erection of a satellite dish and even the addition of door furniture then how can the council allow this campsite to operate or even allow the pods to remain on the site. By doing so you are setting a very dangerous precedent. A pod camping site is totally out of character for the garden and the area.

It is obvious that the setting of a listed building is part of its aesthetic value and when you destroy that setting the overall appearance is ruined. Add to that the effect of campers staying onsite for 303 nights a year along with their vehicles, dogs and campfires and it is naïve to suggest there would be no permanent damage caused.

In the previous application the owners claim that the revenue generated from renting out the pods will be used to fund repair works. Although the pods were rented out last summer, in October the owner was appealing on social media for people to donate £15 to purchase trays to catch the rainwater poring through the roof.

(Please see attachment KH PODS 4)

Repairing the roof should have been addressed as a matter of urgency yet it appears that none of the funds raised from the campsite last summer were used to do this. Instead of repairing the roof the owners spent tens of thousands of pounds on the pods, put them on the site and operated the campsite without a licence, council permission or any regard for the impact this would have. If the owner was appealing for donations of £15 for water collecting trays in October, then it is obvious that none of the income from the pods was used to even temporarily patch the large holes in the roof.

If the funds from last year were not used for even the most urgent basic repairs it is difficult to accept that further income will be properly allocated. It is also absurd to suggest this campsite could ever finance the restoration of the Hall and Gardens.

Many experts have estimated that the restoration of the hall would cost between £50 million and £90 million. If the owners continue to charge £50 per night x 303 nights a year even at full occupancy this would only gross £242,400 pa. Over 6 years this amounts to just over £1.45 million. That equates to less than 2.5% of the most conservative estimate for restoration.

As we said at the beginning, we already know the impact this campsite will have on the site, the area and on our own lives. Last summer it was only running for approximately 3 months and, as it was just getting established, was not constantly full. Now we are being asked to tolerate an established site for 10 months each year for 6 years. (Unless the 6 year period includes last year which those of us who had to suffer it would see as 'time served'.)

Our many complaints to the council and other organisations during the summer of 2021 make it very clear that it would be impossible for any person to live so close to this campsite. The council are aware of the disruption already caused to ourselves, other residents, and the local area and this will be borne out in other objections we expect you will receive in due course.

It is obvious that no funds were used for basic emergency repairs and as a result the Hall continues to deteriorate. The gardens have already been irreversibly damaged and allowing hordes of campers, cars and campfires onto the site will cause further destruction as well as the potential to completely destroy a listed garden and buildings.

Your motto is Tegwch I Bawb; Fairness for all. You are not being fair to all if you allow this campsite to continue to operate. You are not being fair to all if you allow the owners to exploit and despoil this historic site while causing disruption and distress to many others. You are not being fair to all of those living within the Conwy County Borough who trust you to protect their right to peaceful enjoyment of their homes and environment and you are not being fair to those who will come after us and may never get to see the buildings and sites that so many have fought to protect.

You are not being fair to all if you allow one owner to be immune from any form of censure or penalty for endangering or causing damage to a listed building, a listed site, protected trees and wildlife as well as disrupting the lives of those who live close to the hall.

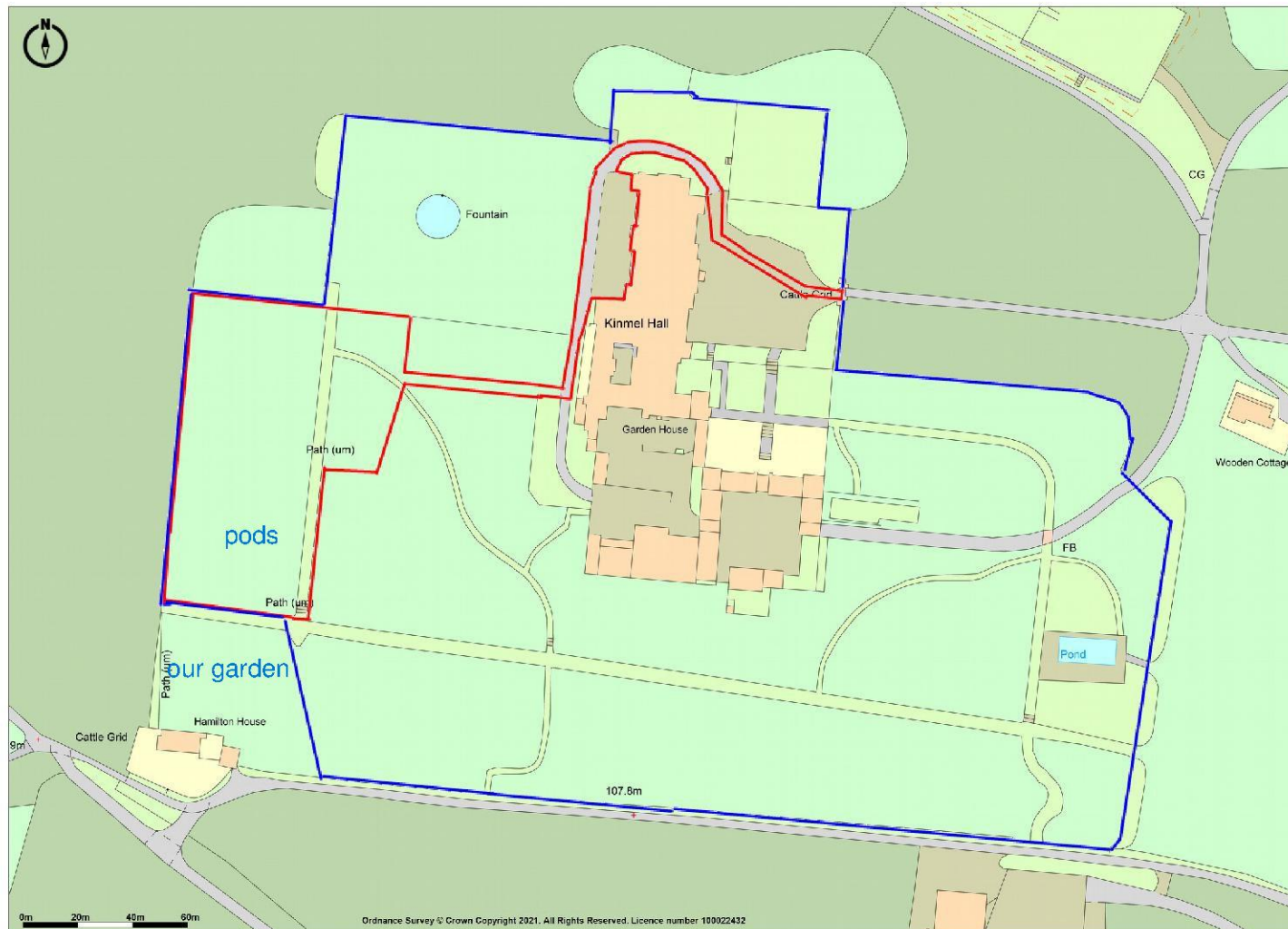
The campsite is out of character, harmful and disruptive. It has already caused damage and distress and therefore permission should not be given.

Pauline Watkins

Shaun Watkins

RECEIVED: 02 Feb 2022

APPLICATION NO: 0/49367









Chris Cryer ► Kinmel Hall

20 October 2021 · 🌐



Let's see who really cares

With the winter kicking in and it seemingly never stopping water pouring in roof work is virtually impossible

£15 for a 1 meter square tray

Who wants to make a difference

There is 130 in site around the building

But we still need more

Pledge your support for kinmel hall

And better still you could come out of your armchairs and empty some

