

Heritage Impact Statement

Albert Gubay Business School, Bangor
University

August 2025

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1. Introduction

- 1.1 This Heritage Impact Statement (the 'Statement') has been prepared by Turley Heritage on behalf of Bangor University (the 'applicant') in connection with applications for full planning permission and listed building consent for the alteration, partial demolition and extension of Friars Lower School, Bangor (the 'Site') to facilitate the creation of a new business school (the 'Proposed Development'), to be known as the Albert Gubay Business School.
- 1.2 The Site comprises the grade II listed Friars Lower School (listing reference no. 3983), which is currently vacant having last been used as part of Coleg Menai, a further education facility. The Site does not form part of an area based heritage designation and there are no additional historic assets outside of the Site boundary with potential to be affected by the Proposed Development.
- 1.3 In determining the applications for full planning permission and listed building consent, Cyngor Gwynedd ('CG') has statutory duties under the Planning (Listed Buildings and Conservation Areas) Act 1990 as amended by the Historic Environment (Wales) Act 2016 to have special regard to the desirability of preserving listed buildings, their setting or any features of special architectural or historic interest.
- 1.4 Future Wales: The National Plan 2040 (2017), Planning Policy Wales (2024) ('PPW') and Technical Advice Notes ('TANs') provide the Welsh Government's national planning policy on the conservation of the historic environment. In respect of information requirements for applicants, Section 5 of TAN 24 states the following:

"Applicants for listed building consent are required to provide a heritage impact statement. This presents the results of a heritage impact assessment, which is a process designed to ensure that the significance of the building is taken into account in the development and design of proposals for change. Heritage impact assessment should be proportionate both to the significance of the listed building, and to the degree of change proposed, and the statement should provide enough information to allow the local planning authority to judge significance and impact when considering applications for listed building consent."
- 1.5 To comply with these requirements, Section 2 of this Statement introduces the Site and provides a summary of its historic development. Section 3 provides an assessment of the significance of the listed building, including any contribution made by setting, proportionate to both the importance of the asset and the likely impacts. An assessment of the impact of the Proposed Development on the significance of the listed building is set out in section 4, in light of the statutory duties of the 1990 Act, national and local planning policy for the historic environment (set out in detail in **Appendix 1**). The conclusions of this Statement are summarised in Section 5.
- 1.6 This Statement has been prepared on the basis of published information, proportionate archival research and a site visit carried out in August 2025. It has been

prepared in accordance with national guidance and best practice advice in relation to the historic environment.¹

¹ Welsh Government, 2017. *Technical Advice Note 24: The Historic Environment*.

2. Site Context and Historic Development

Site Context

- 2.1 The Site is located to the north west of Ffriddoedd Road, close to the junction with Trem Elidir, in Bangor, Gwynedd (**Figure 2.1**). It is bounded to the south east by Ffriddoedd Road, to the north east by the grounds of Reichel Hall, to the north west by a rifle range and to the south west by private playing fields. The wider surrounding area is characterised by a mix of residential properties notably to the south and west, university facilities and halls of residence to the north east, other educational buildings including former Coleg Menai buildings to the south east and further university buildings, playing fields, agricultural land and woodland to the north.

Figure 2.1: Aerial view of the Site and surrounding area



- 2.2 The Site comprises the grade II listed Friars Lower School which is set back from Ffriddoedd Road behind a landscaped forecourt with mature trees and a stone boundary wall. A one way road loops around the building providing access to car parking areas to the rear. There are two further detached buildings within the Site which fall outside of the scope of the Proposed Development; one to the west of Friars Lower School and one to the north. The complex is currently occupied by Bangor University having previously been used as part of Coleg Menai, which relocated to new premises in the Park Menai Business Park in March 2025.

Historic Development of the Site

- 2.3 Ysgol Friars, or Friars School, was established as a Grammar School for Boys in 1557 by Dr. Geoffrey Glyn. The school was so named as it originally utilised the old Friary building of the Dominican Order in Bangor. In 1789, the school was transferred to a

new school building close to the High Street and present Glynne Road under the patronage of John Warren, Bishop of Bangor.

- 2.4 The Welsh Intermediate Education Act 1889 introduced a state system of secondary education in Wales which led to Friars School being brought under the direction of Caernarfonshire County Council. Shortly thereafter in 1900, a second replacement school was built on previously undeveloped rural land outside of the limits of the settlement (**Figures 2.2 and 2.3**). The chosen site was intentionally remote to maintain distance from the unsanitary conditions of the Lower Adda Valley following an outbreak of typhoid.

Figure 2.2: Extract from the OS County Series Map of Caernarfonshire, 1888. The approximate location of the Site is circled in red

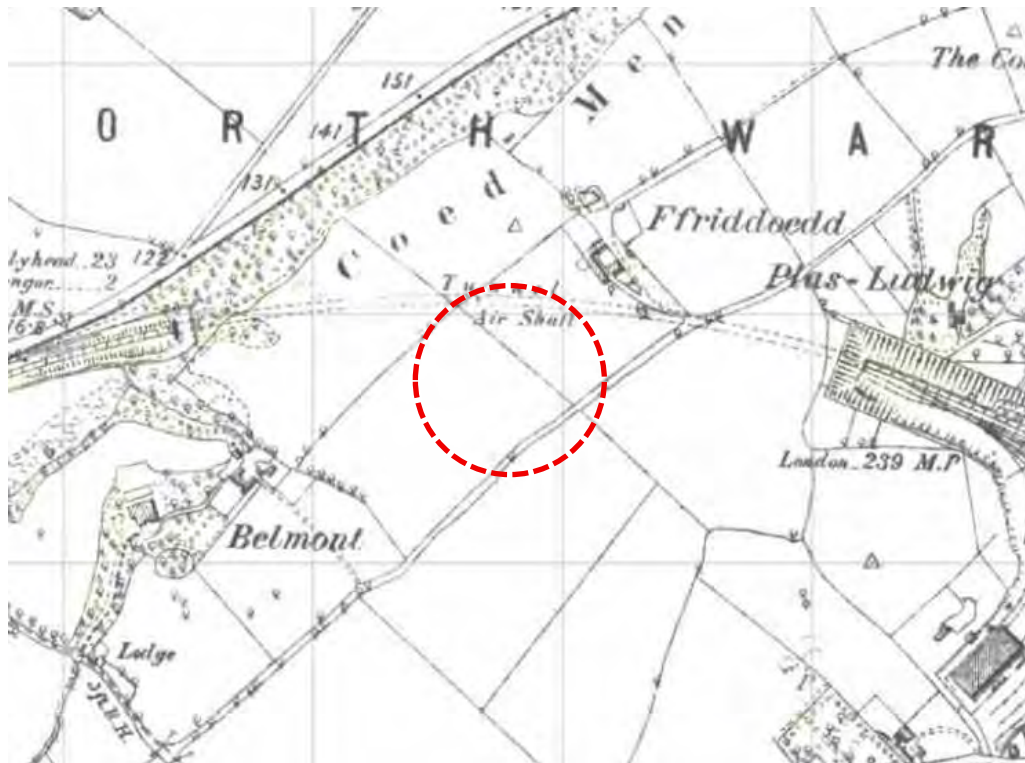
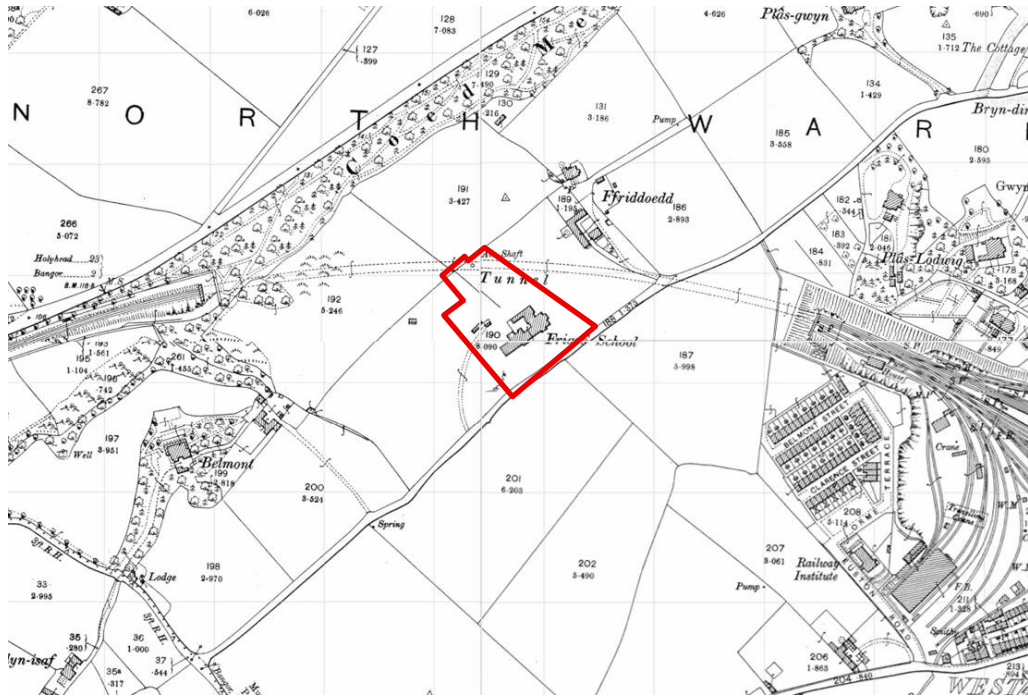


Figure 2.3: Extract from the OS County Series Map of Caernarfonshire, 1900. The approximate location of the Site is outlined in red



- 2.5 In the early 1940s, a two storey cruciform extension was built to the rear (north west) of the Friars School and a detached T-shaped building (now the Performing Arts School) was also built within the grounds (**Figures 2.4 and 2.5**). The extension contained a large assembly hall at ground floor level plus additional teaching rooms and staff facilities.

Figure 2.4: Extract from the OS County Series Map of Caernarfonshire, 1949. The approximate location of the Site is outlined in red

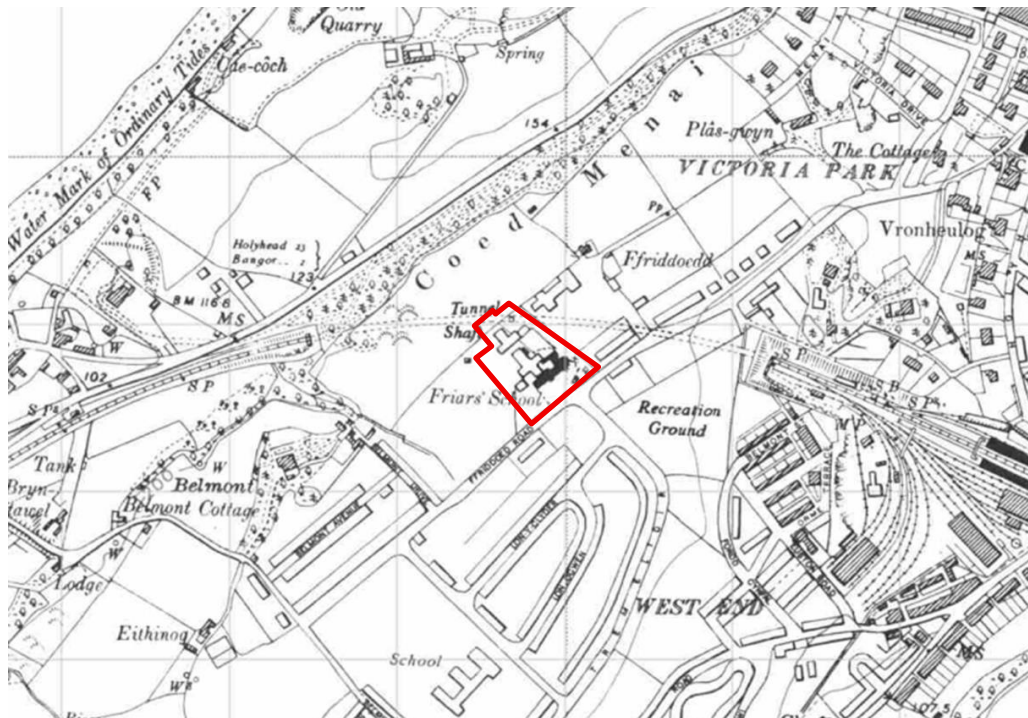


Figure 2.5: Aerial photograph of Friars School, 1946 (Britain from Above – WAW001732)



- 2.6 The town of Bangor expanded over the course of the 20th century with the creation of residential suburbs in the vicinity of the Site. In response to the diminishing rural character of the surrounding land, the former Chairman of the Governors, R. L. Archer, bequeathed a small plot of land to the school in 1955 to maintain, at least in part, an open setting for the school buildings.
- 2.7 In 1968, the Caernarvonshire Local Education Authority published proposals for the merger of three secondary schools in Bangor. These were Friars School, the Bangor Girls Grammar School and Deiniol Secondary-Modern School. In 1971, a new comprehensive school was created and was to be predominantly housed in a new building at Eithinog, while the lower forms occupied the former Friars School building and the old Bangor Girls Grammar School. This arrangement continued until 1999, when pupils attending the Friars School building were relocated to a new single site which replaced the 1971 buildings.
- 2.8 The former Friars School building was subsequently occupied by Coleg Menai until March 2025 when this too was relocated to new premises in the Park Menai Business Park. The Site was recently purchased by Bangor University and, whilst currently vacant, forms part of the university's campus which extends to the north and east of the Site and includes the neighbouring Reichel Building (of early 1940s date) as well as the surrounding playing fields.

Figure 2.6: 2023 Google Earth aerial imagery. The approximate location of the Site is outlined in red



Summary of Historic Development

- Prior to the 20th century, the Site comprised a series of undeveloped fields within a predominantly rural landscape.
- Friars School, originally founded in 1557, was relocated to the Site in 1900 after being brought under the direction of Caernarfon County Council.
- The new school building was extended to the rear and a detached building erected within the Site in the early 1940s.
- From 1971, Friars School was merged with two secondary schools to become a comprehensive school and the Site was occupied only by the lower forms.
- Friars School relocated to a new, single site in 1999, after which time the Site was occupied by Coleg Menai until its recent purchase by Bangor University.

3. Assessment of Significance

Introduction

- 3.1 This section provides an assessment of the significance of the grade II listed Friars Lower School. The assessment is intended to be proportionate to the importance of the historic asset and sufficient to understand whether any potential impacts would arise as a result of the Proposed Development. It has been informed by a site visit carried out in August 2025, historic map regression and a review of existing published information.

- 3.2 TAN 24 defines the significance of a historic asset as:

“An identifiable component of the historic environment. It may consist or be a combination of an archaeological site, a historic building or area, historic park and garden or a parcel of historic landscape. Nationally important historic assets will normally be designated.”²

Listed Buildings

- 3.3 Listed buildings are defined as designated historic assets that hold special architectural or historic interest. The criteria on which listing decisions are made are set out in Annex B of TAN 24 and supported by guidance on listing published by Cadw³.

Setting

- 3.4 TAN 24 defines the setting of a historic asset as:

“The setting of an historic asset includes the surroundings in which it is understood, experienced and appreciated embracing present and past relationships to the surrounding landscape. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral. Setting is not a historic asset in its own right but has value derived from how different elements may contribute to the significance of a historic asset.”⁴

- 3.5 Cadw has published guidance⁵ in respect of the setting of historic assets, providing detail on understanding setting and the associated assessment of the impact of any changes. The guidance confirms that:

“Setting is not itself a historic asset, though land within a setting may contain other historic assets. The importance of setting lies in what it contributes to the significance of a historic asset.”

² Welsh Government, 2017. *Technical Advice Note 24: The Historic Environment*. Paragraph 1.7.

³ Cadw, 2018. *Understanding Listing in Wales*.

⁴ Welsh Government, 2017. *Technical Advice Note 24: The Historic Environment*. Paragraph 1.25.

⁵ Cadw, 2017. *Setting of Historic Assets in Wales*.

- 3.6 The guidance also confirms that the setting of a historic asset can include both physical and less tangible elements, and that the setting of a historic asset is not fixed and may change through time as the asset and its surroundings evolve. It identifies the general principles to be considered when assessing the impact of a proposed change or development within the setting of historic assets.

Friars Lower School – Grade II listed building

- 3.7 Friars Lower School is a school building which opened in 1900 for use by Friars School (Ysgol Friars). It was built in 1899 to designs by Chester architects Douglas and Minshull, and was extended to the rear in the early 1940s. The building was listed at grade II in August 1988.

Architectural interest

- 3.8 Friars Lower School is of special architectural interest as a good example of late 19th century Tudor Revival architecture utilised in an educational context. The style is maintained throughout the original two storey front range with particular detail and emphasis being reserved for the principal (south east) elevation (**Figure 3.1**). The return and rear elevations are slightly more restrained in terms of detailing but maintain the same style and materials (**Figure 3.2**).

Figure 3.1: View of the principal elevation from the south east



- 3.9 The principal range is of grey snecked rubble construction with sandy orange freestone dressings including string course, eaves band and gable parapets with finials, beneath slate roofs. The fenestration and detailing throughout the building is representative of the Tudor style, with mullion and transom leaded windows, some with stained glass, and a segmental headed doorway forming the principal entrance. The entrance also

features a large carved stone coat of arms above. The range is predominantly two storeys in height with two and a half and three storey projecting elements such as gables and the central tower providing a sense of depth and rhythm, in conjunction with occasional dormer windows and chimney stacks.

Figure 3.2: View of the rear and left return elevation of the principal range from the north west



- 3.10 The 1940s extension to the rear (north west) of the principal range is two storeys in height and has a cruciform plan. The linking range and part of the western cross range (**Figure 3.3**) is of a snecked stone construction and features Tudor details and fenestration which is comparable to the rear elevation of the principal range, with which they form an external courtyard.
- 3.11 The rest of the extension is more utilitarian in appearance, with small paned casement windows, plain sills and lintels, and pebbledash rendered elevations (**Figures 3.4 and 3.5**). The rear extension also incorporates poorly integrated, utilitarian two storey fire escape structures in pebbledash render and with flat roofs. Taken as a whole, the rear extension is functional in appearance and of limited architectural interest. The principal range by comparison has a more consistent architectural identity and greater concentration of features and details. There is a strong sense that the principal (south east) elevation was intended to be the architectural focus of the building, whilst less concern was given to the external appearance of the rear extension with the exception of the linking range and western cross range.

Figure 3.3: Views of the western cross range (left) and linking range (right) of the rear extension from the west



Figure 3.4: Views of the rear extension from the west



Figure 3.5: View of the eastern cross range of the rear extension from the north east



- 3.12 Internally, the original layout of the building remains legible in spite of the insertion of partition walls to subdivide some of the internal spaces. There is a largely consistent historic decorative scheme throughout the building, with a mix of tiled and parquet flooring (mostly covered by carpet) (**Figure 3.6**), skirting and dado rails (incised directly into the stonework) and timber door architraves. This has been obscured in some areas by modern wall linings and/or fixtures such as furniture, benches, workbenches, sinks, toilets, dumbwaiters, kiosks and bars. These modern features, wall linings and later inserted partition walls are of no architectural interest. Modern suspended ceilings have also been inserted in most rooms and in some instances obscure historic features such as timber roof trusses (**Figure 3.7**) and cornicing (**Figure 3.8**).

Figure 3.6: Floor tiles (left) and parquet flooring (right) in the principal range

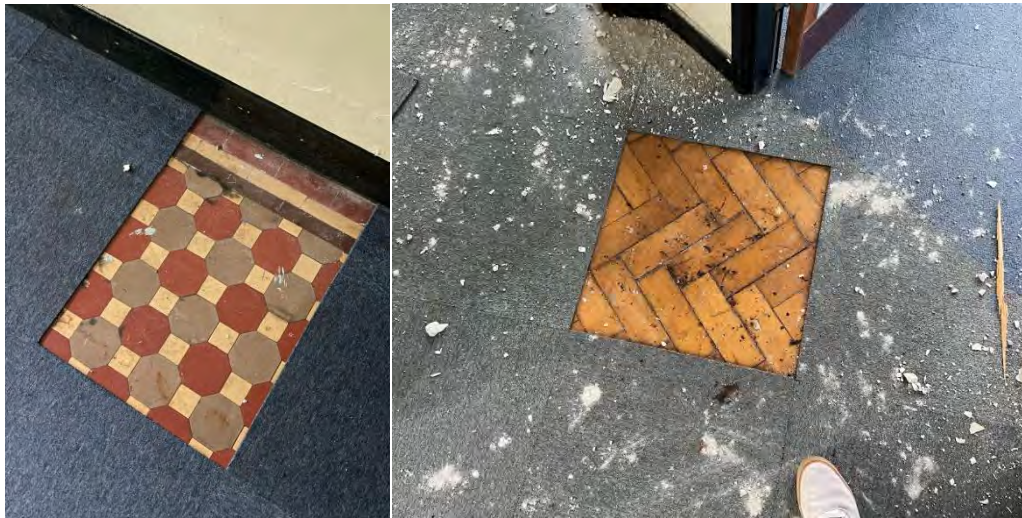


Figure 3.7: Concealed timber roof truss and modern suspended ceiling in the principal range



Figure 3.8: Cornicing in the former headmaster's house in the principal range



- 3.13 Timber trusses remain exposed in two first floor rooms within the principal range (**Figure 3.9**). The building also retains historic timber staircases with balustrading (**Figure 3.10**), timber doors and partitions, some of which are partially glazed offering intervisibility between former classrooms and corridors (**Figure 3.11**). The interior of the rear extension is comparatively plain. It features a utilitarian staircase with a metal balustrade (**Figure 3.12**) and a former assembly hall with parquet flooring, timber wall panelling and a timber stage (**Figure 3.13**). The former classrooms and staff rooms in the rear extension also retain timber roof trusses concealed above modern suspended ceilings (**Figure 3.14**).

Figure 3.9: Exposed timber roof trusses in the principal range



Figure 3.10: Timber staircases with balustrades in the principal range



Figure 3.11: Glazed timber classroom partitions in the principal range



Figure 3.12: Staircase with metal balustrade in the rear extension



Figure 3.13: Former assembly hall in the rear extension with parquet floor and stage

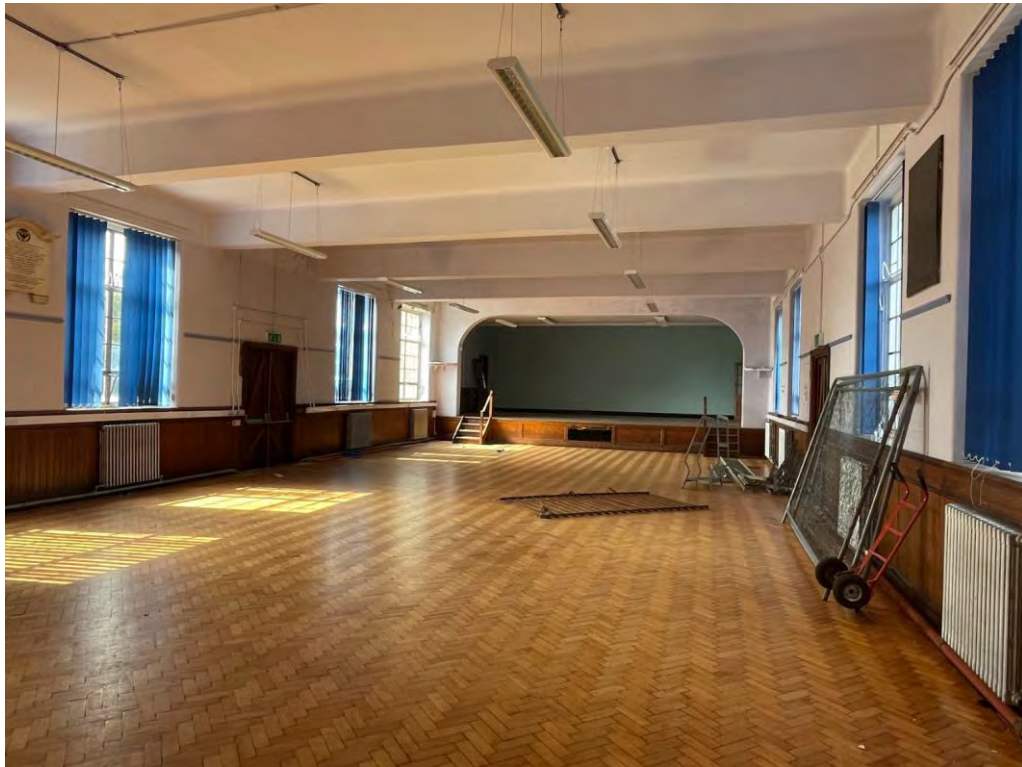


Figure 3.14: Concealed timber roof trusses above suspended ceiling in the rear extension



Historic interest

- 3.14 Friars Lower School is of special historic interest as a purpose-built replacement school building of 1899 for Friars School (Ysgol Friars), which is the second oldest extant school in Wales. The Tudor architectural style of the building purposely reflects the founding of the school in the 16th century (1557). The historic use of the building as a school remains legible and is illustrated by the existing layout and character of the former classrooms, corridors, staff rooms and assembly hall. The later additions to the building and within the school grounds, including the 1940s cruciform extension and

detached subsidiary buildings, reflect the site's continued use and the changing requirements of the school over the course of the 20th century.

- 3.15 The listed building derives some historic interest from its association with the broader history of Friars School and educational reform in Wales, which led to relocation of the school in 1900 whilst under the direction of Caernarfonshire County Council as well as its subsequent relocation to new premises in 1971 after it became a comprehensive.
- 3.16 The listed building also derives some historic interest from its association with architects Douglas and Minshull of Chester, of which John Douglas is notable as a proponent of the Gothic Revival style in the late 19th and early 20th centuries. Douglas' work is well represented throughout Cheshire and North Wales and includes churches, houses, shops, banks, offices, schools, memorials and public buildings.

Contribution made by Setting

Physical Surroundings

- 3.17 Friars Lower School is situated within broadly rectangular grounds on the north side of Ffriddoedd Road which envelop the former school and its ancillary outbuildings. The grounds are mostly hard surfaced with the exception of some grassed areas to the front (south east) of the principal range. The grounds are bounded to the south west by an original low stone wall and modern fence, behind which is a row of mature trees (**Figure 3.15**). The north west boundary of the grounds is undefined and bleeds directly into a large grassed playing field to the west of the listed building. A single storey rifle range and mature hedgerow demarcate the northern and eastern boundaries respectively.

Figure 3.15: View of Friars Lower School from the south east on Trem Elidir



- 3.18 The wider surrounding area is well developed with a mixture of housing, notably to the south and west, university facilities and halls of residence to the north east, other educational buildings including former Coleg Menai buildings to the south east and further university buildings, playing fields, agricultural land and woodland to the north.

Experience of the Asset

- 3.19 Friars Lower School is principally experienced from the south and south east along Ffriddoedd Road and Trem Elidir, where the principal range is most visible set back from the road behind the landscaped forecourt of the former school grounds. Views of the listed building from a greater distance are generally obscured by the surrounding topography and intervening landscape features, notably trees and hedgerows (**Figure 3.16**), though occasional glimpsed views of the tallest elements of the listed building are available throughout the immediate surrounding area (**Figure 3.17**).

Figure 3.16: View north east along Ffriddoedd Road – Friars Lower School is screened from view to the left



Figure 3.17: View towards Friars Lower School from within the university grounds to the north east



- 3.20 Friars Lower School is experienced in connection with ancillary school buildings of early 20th century date and the original boundary walls and gates which reflect the historic character and phased development of the grounds and contribute to the significance of the listed building. In other respects, the historic character of the grounds has been diminished by the introduction of hardstanding (which varies in age and materials throughout the Site), car parking bays, unsightly modern structures and paraphernalia including a storage container and prefabricated storage structure (**Figure 3.18**).

Figure 3.18: View of the storage container (left) and prefabricated structure (right) within the grounds of Friars Lower School



4. Impact Assessment

Introduction

- 4.1 In determining the submitted applications for full planning permission and listed building consent, CG has statutory duties under s.16(2) and s.66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 as amended by the Historic Environment (Wales) Act 2016 to have special regard to the desirability of preserving listed buildings, their setting and any features of special architectural or historic interest they possess.
- 4.2 Paragraph 6.1.10 of PPW states that *“there should be a general presumption in favour of the preservation or enhancement of a listed building and its setting, which might extend beyond its curtilage. For any development proposal affecting a listed building or its setting, the primary material consideration is the building, its setting or any features of special architectural or historic interest which it possesses.”*
- 4.3 Paragraph 6.1.11 states *“for these listed buildings, the aim should be to find the best way to protect and enhance their special qualities, retaining them in sustainable use. The application of planning and listed building controls should recognise the need for flexibility where new uses have to be considered in order to secure a building’s survival or provide it with a sound economic future.”*
- 4.4 Paragraph 5.13 of TAN 24 states *“when considering a listed building consent application, the local planning authority should consider the following issues:*
- *The importance and grade of the building and its intrinsic architectural or historic interest.*
 - *The physical features of the building which justify its listing and contribute to its significance (for example its form and layout, materials, construction and detail) including any features of importance such as the interior, which may have come to light after the building’s inclusion on the list.*
 - *The contribution of curtilage and setting to the significance of the building, as well as its contribution to its local scene.*
 - *The impact of the proposed works on the significance of the building.*
 - *The extent to which the proposed works would bring substantial community benefits for example, by contributing to the area’s economy or the enhancement of its local environment.”*
- 4.5 Paragraph 5.15 states *“an application for the demolition of a listed building should be made in exceptional circumstances and only as an option of last resort. Consent for demolition should not be given simply because redevelopment is economically more attractive than the repair and re-use of a historic building. The following factors need to be considered:*

- *The condition of the building, the cost of repair and maintenance in relation to its importance and the value derived from its continued use. Where a building has been deliberately neglected, less weight will be given to these costs.*
- *The efforts made to keep the building in use or to secure a new use, including the offer of the unrestricted freehold of the building for sale at a fair market price that reflects its condition or situation.*
- *The merits of alternative proposals for the site, including whether the replacement buildings would meet the objectives of good design and whether there are substantial benefits for the community that would outweigh the loss resulting from demolition.”*

- 4.6 The relevant heritage legislation, policy and guidance for consideration of the Proposed Development is set out in full in **Appendix 1**.

The Proposed Development

- 4.7 The Proposed Development comprises the alteration, partial demolition and extension of the grade II listed Friars Lower School to facilitate the creation of a new business school for Bangor University. It aims to refurbish and reuse the principal listed building whilst replacing the 1940s rear extension with a purpose-built, contemporary extension to provide enhanced facilities for the university’s business school. Full details of the Proposed Development are provided in the Design & Access Statement and measured drawings prepared by Day Architectural.

Proposed New Extension

- 4.8 The proposed extension would be situated in the same location as the existing 1940s extension, to the rear (north west) of the principal range, but would have a broadly rectangular rather than cruciform footprint. It would be two storeys in height with a mixture of pitched and flat roof elements intended to reflect the rhythm and character of the roof form of the listed building (**Figure 4.1**). The extension would adopt a simple and robust contemporary form, utilising a mixture of red and light grey brick, red and light grey vertical standing seam cladding, and glazing for the external elevations. The colour and tone of the proposed materials is informed by colours present within the architectural details of the listed building.
- 4.9 The roof plant would be screened using a mix of grey vertical standing seam cladding panels and red aluminium perforated fins arranged to read as a paired gable. The same perforated fins would also be used as detailing on the proposed south west elevation (**Figure 4.2**). Glazing would also be used throughout the elevations to provide visual interest, with a mixture of window styles and sizes proposed including curtain glazing and double height windows.

Figure 4.1: Computer generated image of the north east elevation of the proposed rear extension



Figure 4.2: Computer generated image of the north west (left) and south west (right) elevations of the proposed rear extension



Proposed Internal and External Alterations

- 4.10 The retained section of the listed building is proposed to be refurbished and utilised to provide a mix of teaching spaces, offices and associated facilities for students and staff. The internal floor plan would be largely retained with some limited removal of modern partition walls to reinstate original room proportions, and all existing staircases, balustrading, parquet and tiled flooring, timber roof trusses and glazed timber partitions would be retained to maintain the character of the interior.

- 4.11 Some minor works to structural walls are required to meet the university's teaching requirements and create a satisfactory internal environment, including the creation and reinstatement of door openings and the removal of one structural wall and chimney breast at ground floor level within the proposed 'trading room'. A limited number of new partition walls are also proposed to be inserted to satisfy the requirements of fire regulations, including within the entrance hall and first floor landing area.
- 4.12 The proposed external works are limited to localised, like-for-like repair works, notably to windows where glazing panes are damaged or missing.

Proposed Landscaping Works

- 4.13 New tarmac and car parking areas are proposed following the demolition of the existing rear extension, though the existing one way circulation arrangement would be retained. The area surrounding the proposed extension and in particular the main entrance would be formalised with a mixture of asphalt (two different tones) and tiled paving. The perimeter of the extension would also be highlighted by a pebbled offset and two new planters are proposed to be introduced. The existing bin store would be relocated to the western corner of the Site alongside a new cycle parking area. Finally, a new path is proposed to be formed to connect the business school with the Reichel Building and wider university campus, requiring an opening to be formed in the existing hedgerow to the eastern boundary of the Site (refer to **Figure 3.17**).

Impact Assessment

- 4.14 This section describes the impact of the Proposed Development on the significance of the grade II listed Friars Lower School. The assessment employs TAN 24 and current national advice provided by Cadw as an appropriate framework for analysis, including Conservation Principles for the Sustainable Management of the Historic Environment in Wales (2011).

Impact on Friars Lower School

- 4.15 As set out in Section 3, Friars Lower School holds special architectural and historic interest as a late 19th century school building in the Tudor Revival style. The early 1940s rear extension is of limited architectural interest when compared with the principal range but illustrates the phased development and changing requirements of the school during the 20th century. The listed building also draws significance from its association with the wider history of Friars School (Ysgol Friars), which was established in 1557 and is the second oldest extant school in Wales, and with Chester architects Douglas and Minshull.
- 4.16 The Proposed Development would result in the demolition of the cruciform early 1940s extension and its replacement with a new, two storey extension. As illustrated in the Design & Access Statement, the existing extension is in a poor condition requiring considerable repair works and following a design exercise would not satisfy the requirements of the university for its new business school.
- 4.17 With the exception of one elevation which reflects the Tudor Revival style of the principal range forming a courtyard, the exterior of the rear extension is functional in appearance and of limited architectural interest. The extension does however retain a

series of former classrooms, staff facilities and assembly hall, which are decorated in a restrained but consistent style and illustrate the changing use and character of the school through time. The demolition of the extension would therefore diminish the cohesion of the listed building and impact upon the ability to understand the historic phased development of the former school. This impact is limited, however, by the relatively low level of significance which the listed building derives from the rear extension, which is a later addition of low architectural quality.

- 4.18 The proposed replacement extension would be of a similar scale to the existing extension, albeit on a broadly rectangular rather than cruciform plan. The contemporary form of the extension would provide a distinct contrast with the traditional architectural character of the principal listed building, enabling it to be experienced as a later addition and for the phased development of the listed building to be understood. The incorporation of a mix of red and grey tones as well as the variety of gabled roof forms takes inspiration from the existing building and would help to tie in the new extension. The new extension represents an improvement in architectural quality over the existing extension and the resulting visual enhancement would offset the loss of significance arising from the demolition of the 1940s extension, at least in part.
- 4.19 The proposed extension would principally be experienced from within the former school grounds and to the rear of the principal range. With the exception of views taken from across the neighbouring playing pitches, it would be effectively screened by the principal range when viewed from the south and south east including from Ffriddoedd Road and Trem Elidir. These key views of the listed building, where its principal elevation is experienced in conjunction with the original gates and boundary wall (refer to **Figure 3.15**) would be unaffected by the Proposed Development due to the small scale of the extension and the local topography. Where visible in connection with the listed building, the proposed extension would be experienced as a sympathetic and subordinate addition.
- 4.20 The proposed internal alterations to the listed building are limited to those required to facilitate the reuse of the building as part of the proposed business school. The overall historic layout of the building would be retained and revealed to a greater extent by the removal of a number of modern stud wall partitions and fixtures such as sinks, toilets, dumbwaiters, kiosks and bars. This, combined with the retention of key architectural features such as the staircases, timber roof trusses and partitions, will ensure that the historic character of the internal space is sustained and the original layout and intended use of different parts of the building remains legible.
- 4.21 The proposed limited removal of structural fabric, including to create the large ‘trading room’, would result in a minor loss of evidential value arising from the permanent removal of historic fabric. This is limited to a small number of instances and would have a negligible overall impact on the significance of the listed building. Conversely, the retention and localised repair of historic features including windows will restore historic and architectural interest and support the long term conservation of the listed building.

- 4.22 In summary, the Proposed Development would introduce an active use to the listed building and have a mixed effect on its significance, with a mix of positive, neutral and negative impacts. The Proposed Development should be considered within the context of the current vacancy of the listed building and poor condition of the rear extension.

Statutory Duties and National Planning Policy

- 4.23 Based on our assessment of grade II listed Friars Lower School, it is concluded that there would be a mixed effect on significance, with a combination of positive, neutral and negative impacts. The negative impacts are principally associated with the demolition of the 1940s rear extension and a small number of internal alterations, which would result in the loss of historic fabric causing an overall very minor loss of significance. The Proposed Development would also introduce a high quality, contemporary and sympathetic extension which would visually enhance the Site whilst supporting the reuse of the principal range of the listed building.
- 4.24 In accordance with Paragraph 6.1.11 of PPW, *“the application of planning and listed building controls should recognise the need for flexibility where new uses have to be considered in order to secure a building’s survival or provide it with a sound economic future.”*
- 4.25 When considering the submitted applications, CG must bear in mind the considerable importance and weight to be given to the statutory duties of the Planning (Listed Buildings and Conservation Areas) Act 1990, as amended by the Historic Environment (Wales) Act 2016.

Local Planning Policy

- 4.26 In accordance with Policy PS 20 of the Anglesey and Gwynedd Joint Local Development Plan 2011-2026, Written Statement, this Statement provides a description of the significance of the grade II listed Friars Lower School and an assessment of the potential impact of the Proposed Development. There will be a mixed effect on significance, with a mix of positive, neutral and negative impacts, which should be addressed in accordance with the statutory duties of the 1990 Act and requirements of national planning policy.

5. Conclusions

- 5.1 This Heritage Impact Statement (the 'Statement') has been prepared by Turley Heritage on behalf of Bangor University (the 'applicant') in connection with applications for full planning permission and listed building consent for the alteration, partial demolition and extension of the former Coleg Menai, Bangor (the 'Site') to facilitate the creation of a new business school (the 'Proposed Development').
- 5.2 The Site comprises the grade II listed Friars Lower School (listing reference no. 3983), which is currently vacant having last been used as part of Coleg Menai, a further education facility. The Site does not form part of an area based heritage designation and there are no additional historic assets outside of the Site boundary with potential to be affected by the Proposed Development.
- 5.3 In determining the applications for full planning permission and listed building consent, Cyngor Gwynedd ('CG') has statutory duties under the Planning (Listed Buildings and Conservation Areas) Act 1990 as amended by the Historic Environment (Wales) Act 2016 to have special regard to the desirability of preserving listed buildings, their setting or any features of special architectural or historic interest.
- 5.4 A review of the history and development of the Site has been undertaken in Section 2 and the significance and setting of the listed building has been described in Section 3. An assessment of the impact of the Proposed Development on the significance of the listed building is set out in Section 4, in light of the statutory duties of the 1990 Act, national planning policy set out in Future Wales: The National Plan 2040, PPW and TAN 24 and local planning policy for the historic environment (set out in detail in **Appendix 1**).
- 5.5 Based on our assessment, it is concluded that there would be a mixed effect on the significance of the listed building, with a combination of positive, neutral and negative impacts. The negative impacts are principally associated with the demolition of the 1940s rear extension and a small number of internal alterations, which would result in the loss of historic fabric causing an overall very minor loss of significance. The Proposed Development would also introduce a high quality, contemporary and sympathetic extension which would visually enhance the Site whilst supporting the reuse of the principal range of the listed building.
- 5.6 In accordance with Paragraph 6.1.11 of PPW, *"the application of planning and listed building controls should recognise the need for flexibility where new uses have to be considered in order to secure a building's survival or provide it with a sound economic future."*
- 5.7 When considering the submitted applications, CG must bear in mind the considerable importance and weight to be given to the statutory duties of the Planning (Listed Buildings and Conservation Areas) Act 1990, as amended by the Historic Environment (Wales) Act 2016.

Appendix 1: Legislation, Policy and Guidance

Legislation

Historic Environment (Wales) Act 2016

The Historic Environment (Wales) Act 2016 was passed by the National Assembly for Wales on 9th February 2016 and became law after receiving Royal Assent on 21st March 2016.

This Act makes a wide range of amendments to a existing legislation, including the Ancient Monuments and Archaeological Areas Act 1979 and the Planning (Listed Buildings and Conservation Areas) Act 1990, with a large proportion relating to a transference of powers from the Secretary of State to the Welsh Ministers of a number of existing powers, including designation of scheduled monuments and listed buildings, together with a number of amendments to the 1990 Act, none of which are considered to be of direct relevance to this Statement.

Planning (Listed Buildings and Conservation Areas) Act 1990

The Planning (Listed Buildings and Conservation Areas) Act 1990 provides that listed building consent is required for:

“(s.7) ... any works for the demolition of a listed building or for its alteration or extension in a manner which would affect its character as a building of special architectural or historic interest”.

In determining applications for full planning permission and listed building consent, the following duties are placed on the decision maker:

“s.16(2) In considering whether to grant listed building consent for any works the local planning authority, or as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.”

“s.66(1) In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.”

The concept of ‘preserve’ has been interpreted through case law to mean ‘to cause no harm’.

Planning (Listed Buildings and Conservation Areas) (Wales) Regulations 2012 as amended by the Planning (Listed Buildings and Conservation Areas) (Wales) (Amendments No. 2) Regulations 2017

These regulations set out the application requirements when applying for listed building consent in Wales.

The 2017 amendments require that every application for listed building consent should be supported by a heritage impact assessment. Section 6(2) of the amendments set out full details of what should be included within this Statement.

National Planning Policy and Guidance

Future Wales: The National Plan 2040 (February 2021)

Future Wales was adopted in February 2021 as the national development framework document for Wales to 2040. It is a spatial plan which sets a direction for future investment in infrastructure and development and provides a strategy for addressing key national priorities through the planning system.

Planning Policy Wales (Edition 12, July 2024)

Planning Policy Wales ('PPW') sets out the land use policies of the Welsh Government. It is supplemented by a series of Technical Advice Notes ('TANs'), Welsh Government Circulars, and policy clarification letters, which together with PPW provide the national planning policy framework for Wales.

PPW sets out the Welsh Government's specific objectives for the historic environment including the objective to seek to *"safeguard the character of historic buildings and manage change so that their special architectural interest is preserved."*

Paragraph 6.1.7 of PPW states *"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."*

Paragraph 6.1.9 states *"any decisions made through the planning system must fully consider the impact on the historic environment and on the significance and heritage values of individual historic assets and their contribution to the character of place."*

With regard to listed buildings, Paragraph 6.1.10 of PPW states that *"there should be a general presumption in favour of the preservation or enhancement of a listed building and its setting, which might extend beyond its curtilage. For any development proposal affecting a listed building or its setting, the primary material consideration is the building, its setting or any features of special architectural or historic interest which it possesses."*

Paragraph 6.1.11 states *"for these listed buildings, the aim should be to find the best way to protect and enhance their special qualities, retaining them in sustainable use. The application of planning and listed building controls should recognise the need for flexibility where new uses have to be considered in order to secure a building's survival or provide it with a sound economic future."*

Paragraph 6.1.12 states *"the demolition of any listed building should be considered as exceptional and require the strongest justification."*

Paragraph 6.1.13 states *"applications for listed building consent must be able to justify their proposals, show why the alteration or demolition of a listed building is desirable or necessary and consider the impact of any change upon its significance. This must be included in a heritage impact statement, which will be proportionate both to the significance of the building and the degree of change proposed."*

Technical Advice Note 24: The Historic Environment ('TAN 24') (May 2017)

TAN 24 provides detailed guidance on how the planning system considers the historic environment during development plan preparation and when making decision on planning and listed building consent applications:

The historic environment is defined as:

“All aspects of the environment resulting from the interaction between people and places through time, including all surviving physical remains of past human activity, whether visible, buried or submerged, and deliberately planted or managed.”

A historic asset is:

“An identifiable component of the historic environment. It may consist or be a combination of an archaeological site, a historic building or area, historic park and garden or a parcel of historic landscape. Nationally important historic assets will normally be designated.”

The setting of a historic asset is described in Paragraph 1.25 of TAN 24 as:

“The setting of an historic asset includes the surroundings in which it is understood, experienced and appreciated embracing present and past relationships to the surrounding landscape. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral. Setting is not a historic asset in its own right but has value derived from how different elements may contribute to the significance of a historic asset.”

Section 5 of TAN 24 considers listed buildings. It clarifies at Paragraph 5.12 how *“applicants for listed building consent are required to provide a heritage impact statement. This presents the results of a heritage impact assessment, which is a process designed to ensure that the significance of the building is taken into account in the development and design of proposals for change. Heritage impact assessment should be proportionate both to the significance of the listed building, and to the degree of change proposed, and the statement should provide enough information to allow the local planning authority to judge significance and impact when considering applications for listed building consent.”*

Paragraph 5.13 states *“when considering a listed building consent application, the local planning authority should consider the following issues:*

- *The importance and grade of the building and its intrinsic architectural or historic interest.*
- *The physical features of the building which justify its listing and contribute to its significance (for example its form and layout, materials, construction and detail) including any features of importance such as the interior, which may have come to light after the building’s inclusion on the list.*
- *The contribution of curtilage and setting to the significance of the building, as well as its contribution to its local scene.*

- *The impact of the proposed works on the significance of the building.*
- *The extent to which the proposed works would bring substantial community benefits for example, by contributing to the area's economy or the enhancement of its local environment."*

Paragraph 5.14 states *"many listed buildings can sustain a degree of sensitive alteration and extension to accommodate continuing or new uses."*

Paragraph 5.15 relates to the demolition of a listed building. It states *"an application for the demolition of a listed building should be made in exceptional circumstances and only as an option of last resort. Consent for demolition should not be given simply because redevelopment is economically more attractive than the repair and re-use of a historic building. The following factors need to be considered:*

- *The condition of the building, the cost of repair and maintenance in relation to its importance and the value derived from its continued use. Where a building has been deliberately neglected, less weight will be given to these costs.*
- *The efforts made to keep the building in use or to secure a new use, including the offer of the unrestricted freehold of the building for sale at a fair market price that reflects its condition or situation.*
- *The merits of alternative proposals for the site, including whether the replacement buildings would meet the objectives of good design and whether there are substantial benefits for the community that would outweigh the loss resulting from demolition."*

Cadw – Conservation Principles for the Sustainable Management of the Historic Environment in Wales (2011)

This document establishes six conservation principles which inform Cadw's approach to the protection and management of the historic environment. These are as follows:

- Historic assets will be managed to sustain their values.
- Understanding the significance of historic assets is vital.
- The historic environment is a shared resource.
- Everyone will be able to participate in sustaining the historic environment.
- Decisions about change must be reasonable, transparent and consistent.
- Documenting and learning from decisions is essential.

The document also includes guidance on how to understand and communicate the heritage values of a historic asset to enable an authoritative statement of significance to be made and allow for the effects of proposed changes to be evaluated. It identifies a family of heritage values to be utilised when assessing heritage significance. These are evidential value, historical value, aesthetic value and communal value.

Local Planning Policy

Anglesey and Gwynedd Joint Local Development Plan 2011-2026. Written Statement (July 2017)

The Anglesey and Gwynedd Joint Local Development Plan was formally adopted on 31st July 2017 and provides a local planning policy framework which informs the majority of decisions on planning applications in the two local planning authority areas.

Policy PS 20 – ‘Preserving and where appropriate enhancing heritage assets’ states *“in seeking to support the wider economic and social needs of the Plan area, the Local Planning Authorities will preserve and where appropriate enhance its unique heritage assets. Proposals that preserve and where appropriate enhance the following heritage assets, their setting and significant views and into and out of the building/area will be granted:*

- (i) Scheduled Ancient Monuments and other areas of archaeological importance (in line with Policy AT 4).*
- (ii) Listed Buildings and their curtilages.*
- (iii) Conservation Areas (in line with Policy AT 1).*
- (iv) Beaumaris Castle and Caernarfon Castle and Town Walls World Heritage Sites (in line with Policy AT 1).*
- (v) Candidate World Heritage Sites.*
- (vi) Registered Historic Landscapes, Parks and Gardens (in line with Policy AT 1).*
- (vii) Buildings of architectural/historic/cultural merit that are not designated or protected (in line with Policy AT 3).”*

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