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# THE VICTORIAN SOCIETY

The champion for Victorian and Edwardian architecture

Mrs. Y. J. Prichard  
Vale of Glamorgan Council Development Control  
by email

Your reference: 2018/01408/FUL  
Our reference: 149760

developmentcontrol@valeofglamorgan.gov.uk

8 March 2019

Dear Mrs Prichard

**RE:** Former Cowbridge Comprehensive School, Aberthin Road, Cowbridge - Proposed demolition of existing school, development of 48 dwellings (43 flats and five houses) and associated works

A member of the public notified the Victorian Society of this application for full planning permission and we would like to offer our comments.

The Society would like to make it clear that it does not object to the principle of development on the site. We do, however, **object** to the proposed demolition of the buildings constructed in 1896 and 1908 comprising the former Cowbridge Comprehensive School ("the school"). In this, we understand that we are in accordance with your authority's Conservation and Design Senior Planner who has recommended that the application is refused (Memorandum dated 7 February 2019). The Society takes note that the Senior Planner has also assessed the school against the criteria for inclusion as a locally listed 'County Treasure' and is satisfied that it meets the criteria with a recommendation for inclusion to be put forward. For reasons noted below, the Society are fully supportive of the recommendation for the school's inclusion as a locally listed 'County Treasure'. We also note that Cadw have confirmed that they consider the building to be locally significant.

The *Archaeological and Heritage Assessment* (the "Assessment") states that the school was established as the Cowbridge Intermediate School for Girls and opened in November 1896. Our research has not elicited any information on a specific construction date or architect for the original building, although the Assessment does provide a copy of a plan and drawings (Image EDP 1) of the boundary walls by Robert Williams (Architect). These are dated 1896 and may intimate that Robert Williams also designed the original school building. In the Assessment, Plan EDP 3: 'The school buildings' shows that the extant school is primarily of two phases – the original building of 1896, and the additions of 1908 which accommodated a laboratory, gymnasium and classrooms.

The original building on the application site was one of ninety-four County Intermediate Schools established throughout Wales in the short period between 1889, when the Welsh Intermediate Education Act ("the Act") was passed, and the turn of the century. The Act is considered a seminal piece of legislation which pre-dates similar legislation in England by twelve years. The intention of the Act was simple – "to make provision for the intermediate and technical education of the inhabitants of Wales and

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*the County of Monmouth.*<sup>1</sup> Consequently, joint education committees were established in every Welsh county with a duty to submit to the charity commissioners a scheme for the implementation of intermediate (between primary and further education) and technical education in their areas. The resultant schools, which were initially called intermediate schools but soon became known as county schools, were designed to mainly cater for the children of the middle classes who had little or no prospect of attending independent public schools due to their social status and financial situation. The schools provided a broad based education which benefited many. However, many children who would have benefited from attending an intermediate school were unable to do so as attendance was voluntary and depended on the parents being able to afford to pay a contribution or a fee. In this regard, the establishment of the Cowbridge Intermediate School for Girls is particularly interesting as the initial development of the school had a local benefactor, John Bevan of Cowbridge, who, the Assessment states, also funded the establishment of a hostel at the school, the school library, the laying out of the grounds and set up a scholarship fund. The extant school evidences John Bevan's philanthropy and the emphasis that he evidently placed on education in his local area and which was not necessarily accessible to all. There is therefore inherent communal value in the extant school which contributes to its significance.

Much of the history of education in Wales is reflected in the school buildings and it is considered that the purpose-built county schools represented an important new building type. Most of these schools, at first, were relatively small (some sites were specifically chosen for the availability of land for future expansion), not only by present day standards but also in comparison with many of the later Victorian board schools. The county schools were essentially considered as day schools serving the local population, which considerably simplified their design. It is understood that boarding education of the type traditional in England was generally mistrusted. Hostels were provided for some children who lived too far from the nearest county school to travel daily which was a development of a much older practice in Wales of 'boarding out' children in local houses.

The need for a new kind of school building was clearly recognised when in 1890 the 'Tate Welsh Intermediate School Competition' was organised by a group of prominent Welshmen, who invited architects to submit model plans for the new type of school required by the Act of 1889. It is believed that the instructions given by the committee were clearly intended to distinguish the new county schools from the elementary schools. These instructions stipulated that there was to be fifteen square feet per child (compared with the maximum of ten square feet in the Board Schools) and in addition to an assembly hall, self-contained classrooms for each class were considered to be essential. The greater importance attached to technical subjects had a considerable influence on the designs adopted for the new schools. One of the plans submitted to the organisers of the competition, that of T.E. Pryce of London (printed in *The Builder* (1890B, 211, design for school for 100 boys), included carpenter's and smith's workshops, a music room and rooms for cookery. Indoor gymnasias were sometimes provided. The 'practical' rooms were usually located within the main building but smaller schools often used utilitarian hutments elsewhere on site. Some of the smaller, rural schools omitted the practical rooms and acquired these several years later.

In some ways, the original Cowbridge Intermediate School for Girls was representative of a newly established Welsh rural county school – it was relatively small but was located in an area where there was land available for future expansion and it had a hostel. Unfortunately, the Assessment does not provide detail on the layout, both historical and current, of the school or an analysis and interpretation of its interior. Beyond the noting of the two main building phases of 1896 and 1908, no further information is given in this regard. It is therefore not possible to fully understand how responsive the original school may have been to the prescriptions of the new building type. Given the severity of the proposal for this historic asset, we would expect a survey of the interior of the building and are concerned by its absence. Furthermore, a basic search for the school on the internet produces a link to a website containing relatively recent photographs of the interior which indicate that historic features, fixtures and fittings of interest remain. The extensive reference to the 'site walkover survey' in the Assessment - terminology more appropriate to the survey of sites with the potential for below-ground archaeology, which admittedly in part is the case here, in our opinion, intimates a lack of familiarity with the survey, analysis and interpretation of standing buildings. In the absence of any statements or supporting information as to the structural unsoundness of the school which would preclude a survey of its interior, we would expect a survey to be undertaken as a matter of course.

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<sup>1</sup> Welsh Intermediate Education Act 1889, *Preliminary, Purpose of Act (2)*

The Society is disappointed that the Assessment does not consider the Wales specific political and social context which influenced the establishment of the intermediate schools and their construction but rather, references Historic England's study on England's schools. Although we agree with the statement that *"the Cowbridge school fits historically into a UK wide drive for school provision in the late 19th century following the 1870 Education Act."* there are, as demonstrated above, Wales-specific factors which influenced the form and function of school buildings in Wales following the Act of 1889. A consideration of the school in this context may lead to a re-assessment of its significance which is noted as 'Low' in the Assessment. To further this point, we would also like to highlight our disagreement with the assessment of 'low' communal value. Section 2.5 of the Assessment considers the heritage values that an assessment of significance references. It states that one of these values is *"The asset's communal value, which is defined as deriving from the meanings that an historic asset has for the people who relate to it, or for whom it figures in their collective experience or memory"*. Section 4.62 then states *"The school building is no longer used as such, and thus its communal value is restricted to it representing a feature of local people's memories"*. Both the Pre-Application Consultation Report and the number of objections to the proposed demolition, including those of the local Town Council, the Assembly Candidate for the Vale of Glamorgan and a Councillor, provide a clear indication of how local people positively regard and value the school as a historic asset of local importance. Section 4.62 continues *"As a local school, it is unlikely that the school was especially well-known beyond Cowbridge and its locality, and as such, its communal value is considered to be relatively low."* We are somewhat confused by this statement as it suggests that because the school is not well-known outside of its immediate area it is of low communal value. Furthermore, section 4.63 acknowledges the school's communal value as being of importance in the local history of Cowbridge which taken with the objections to its proposed demolition would not suggest an ascription of low communal value. Given the strength of opposition to the proposed demolition and both Cadw and your authority's Conservation and Design Senior Planner's opinion on the local significance of the school, we urge your local authority to withhold consent to the planning application in its current form.

Both the Assessment and the Design and Access Statement acknowledge the school's status as a historic asset. *Technical Advice Note (TAN) 24: The Historic Environment* (2017), which is a supplementary planning policy guidance document, defines 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."*

Cadw's *Conservation Principles for the Sustainable Management of the Historic Environment in Wales* (2011) highlights the need to base planning-related decisions on an understanding of the impact a proposal may have on the significance of an historic asset. Principle no.2 of the six Conservation principles states that, *"Understanding the significance of historic assets is vital"*. The Society are of the opinion, for reasons stated above, that the assessment of significance in the Assessment is not fully informed and therefore it is not possible to appropriately consider the impact of the proposals on the significance of this historic asset as directed by planning policy and guidance. Furthermore, Section 6.1.7 of *Planning Policy Wales* (Edition 10, 2018) ("PPW") states that,

*"It is important that the planning system looks to protect, conserve and enhance the significance of historic assets."*

Section 6.1.9 states that,

*"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."*

We would argue that it is not possible to meet these directives in the absence of a fully informed understanding of a historic asset's significance, as we believe to be the case here.

As detailed above, Welsh planning policy gives regard to the school's status as a historic asset and this is acknowledged in the supporting information accompanying the application. We are therefore confused by, and disagree with, the assertion in section 4.3 of the Design and Access Statement that,

*"There is no planning justification to retain the existing building;"*

Is it therefore considered here that there is no acceptable reason for retaining the existing building? We take the understanding that the above assertion is made in the context of planning policy and guidance which addresses designated historic assets such as listed buildings and conservation areas. However, PPW and technical guidance gives consideration to all historic assets, designated and non-designated. Indeed, one of the Welsh Government's specific objectives for the historic environment as contained in section 6.1.6, PPW seeks to "safeguard the character of historic buildings and manage change so that their special architectural and historic interest is preserved;". It is on this basis and for the reasons noted above that we are of the opinion that there may be a planning justification to retain the extant building. This view is further enforced by the provision for the potential conversion of the school that is given in local planning policy, specifically, Policy MG2(18) - Cowbridge Comprehensive 6th Form Block, Aberthin Road of The Vale of Glamorgan Local Development Plan (2017) which states,

*".....The Victorian school building has some architectural merit and lends itself to conversion (our emphasis) although the building is not currently listed."*

The Society believes that the statement that the school lends itself to conversion is an acceptable reason to consider its retention. Furthermore, the response to the proposed demolition, which appears to be overwhelmingly negative, indicates that the school is considered as making an important contribution to the distinctiveness of the local built environment which is considered in Paragraph 6.1.29 of PPW and is highlighted in your authority's Conservation and Design Senior Planner's comments on the planning application. Section 2.28 of the Design and Access Statement states that,

*"Glamorgan Gwent Archaeological Trust have not suggested at this stage that the building is of 'national importance', in that it is not equivalent to a listed building and does not require preservation 'in situ'. This fact is reflected in the site's allocation for residential development, in that the loss of the building and the development of the site for housing is already established in principle."*

This statement is repeated in section 6.11 of the Assessment. Firstly, we would like to refer back to the point made above about terminology. Reference to "preservation 'in situ'" is generally made with reference to below-ground archaeology and not standing buildings. Its use in this context as an important qualifying statement, in our opinion, intimates a lack of familiarity with and/or an understanding of the policy framework and guidance applicable to standing buildings. It is not as straightforward as suggested that a listed building requires "preservation 'in situ'". A listed building's status as a designated historic asset is a material consideration in planning-decisions and planning policy and guidance gives greater regard to its designated status. However, its status as a designated heritage asset does not necessarily mean that it requires "preservation 'in situ'", and neither does it mean that a non-designated historic asset, by default of its non-designated status, is not to be retained. The assessment of the significance of the individual historic asset in the context of applicable planning policy and guidance is much more nuanced. As PPW states in section 6.1.9,

*"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."*

Secondly, the Society partly disagrees with the statement above that "the loss of the building and the development of the site for housing is already established in principle." The application site is allocated for residential development (with a housing allocation of 20) as per Policy MG2(18) - Cowbridge Comprehensive 6th Form Block, Aberthin Road of *The Vale of Glamorgan Local Development Plan* (2017). As such the principle of development on the site is established. However, the policy states that the school lends itself to conversion which clearly implies that options for the school's retention in a proposed residential development scheme could be considered. We do not take from this statement any inference of the acceptability of the school's demolition or the principle of demolition being established. We therefore fundamentally disagree with the assertion that the "loss of the building.....is already established in principle."

The Assessment (section 1.12) states that the Glamorgan Gwent Archaeological Trust "provided a consultation response regarding the treatment of the buildings on site, and regarding the investigation of the site's archaeological potential." Copies of the email correspondence are contained within the Assessment in Appendix EDP2. The Assessment further states in section 1.13,

*“In summary, the Archaeological Planning Officer at GGAT requested that an application to develop the site should be accompanied by the results of an archaeological evaluation. In addition, no requirement to retain the school buildings, on account of their heritage significance, was expressed, and it was stated that any proposal to demolish the existing school buildings would be likely to require a programme of historic building recording prior to demolition. This suggests that GGAT are not of the opinion that the school buildings represent an historic asset of such significance that they require preservation in situ, and that the creation of a record of the buildings would be sufficient to mitigate their loss.”*

The Society believes that it is very important to highlight our difference in understanding of the email correspondence between the applicant's representatives and Mr Rob Dunning, Archaeological Planning Officer at the Glamorgan Gwent Archaeological Trust, specifically around the response regarding the treatment of the buildings of the site. In this correspondence, Mr Dunning is informed of the proposal for demolition and asked to advise on the archaeological significance of the site. Mr Dunning's initial response does not consider the school or its archaeological significance<sup>2</sup> but rather addresses below-ground archaeology. Notwithstanding Mr Dunning's response to the direct question of whether building recording would be required should a proposal for the demolition of the school be put forward, we take it that in the correspondence Mr Dunning remains wholly silent on the question of whether the school should be retained. We therefore take no inference from the silence of his responses as an acceptance of the proposal to demolish the school. The seeking of Mr Dunning's advice on the requirement for building recording suggests that he may also be the appropriate individual to provide advice on the proposal for the demolition of the school. In this regard, we take with interest your authority's Conservation and Design Senior Planner's response to the proposed demolition which is one of objection and consider why their opinion was not solicited as part of the pre-planning application process.

For the reasons noted above and reiterated and expanded upon below, the Society disagrees with the following statements made in justification of the proposals as set out in the Conclusion of the Design & Access Statement,

*“6.2 The site is allocated for residential development under policy MG2(18) of The Vale of Glamorgan Local Development Plan. The principle of the proposed development is therefore established subject to detailed design.”*

We agree that the site is allocated for residential development and as such the principle of development on the site is established. However, the statement that the school lends itself to conversion clearly implies that options for the school's retention in a proposed residential development scheme could be considered. We do not take from this statement any inference of the acceptability of the school's demolition or the principle of demolition being established. We therefore fundamentally disagree with the assertion that the *“principle of the **proposed** (our emphasis) development is therefore established.....”* as the development as proposed would result in the demolition of the school which is not contemplated in the policy statement. Furthermore, the policy statement clearly states that 20 residential units are allocated to the application site. The proposal under consideration here is for 48 residential units which again counteracts the statement that the principle of the **proposed** development is established.

*“6.3 The proposals are considered to accord with national and local planning policy in the form of the new PPW, its supporting TANs; and the Vale of Glamorgan Local Development Plan.”*

The Society is of the opinion that the non-designated status of the school does not preclude it from being retained. It is an acknowledged historic asset and as such, and notwithstanding that it does not benefit from statutory protection, consideration is given to its protection and conservation in national and local planning policy and guidance. Furthermore, the demolition of a historic asset that positively contributes to the townscape runs contrary to fulfilling the objective within the local development plan of sustaining and enhancing local character. Policy SP10 – Built and Natural Environment of the local development plan further states,

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<sup>2</sup> Definition of Buildings Archaeology, *“The application of archaeological principles of systematic recording, analysis and interpretation of standing buildings or “above ground archaeology”*” (Dr Kate Giles from the entry on ‘Buildings Archaeology’, Encyclopaedia of Global Archaeology (2013))

*“Development proposals must preserve and where appropriate enhance the rich and diverse built and natural environment and heritage of the Vale of Glamorgan including:*

- 1. The architectural and / or historic qualities of buildings or conservation areas, including locally listed buildings;*
- 2. ....”*

*“6.4 The design of the development is considered to be an improvement in terms of the general streetscene in comparison to the existing former school building which is currently derelict and in a state of substantial disrepair.”*

It is stated that the school is in a state of substantial disrepair however, we are not aware of any evidence which suggests that it is structurally unsound and which may necessitate demolition. Notwithstanding the school's vulnerable state, standing empty and deteriorating, it appears to be a fine, solid and characterful building. It is constructed of locally-sourced natural materials in parts, and with great attention paid to architectural detail. Historic buildings have a cultural and educational value and play a strong role in contributing to a sense of place and identity. The school makes a positive contribution to local distinctiveness and the general street scene. We are therefore of the opinion that should demolition go ahead, it will have a harmful impact on the character of the townscape and will result in the total loss, in the absence of clear and convincing justification, of a historic asset of historical, aesthetic and communal value.

*“6.6 Accordingly, it is considered that the scheme represents a suitable and well integrated form of sustainable development that will provide a mix of much-needed affordable housing.”*

The Society is of the opinion that the proposed demolition of the school does not constitute sustainable development and the proposal fails to give regard to section 6.1.7 of PPW which states that,

*“Any change that impacts on an historic asset or its setting should be managed in a sensitive and sustainable way.”*

PPW further states that the Historic Environment is a finite, non-renewable and shared resource and consequently, we are of the opinion that the decision to demolish a historic asset and replace it with a new building should not be taken lightly. The sustainable re-use of existing buildings should be a priority. Replacing a building has significant, energy, carbon and financial cost implications. Generally, a full life cycle analysis should be conducted for the replacement building(s) and should include the end-of-life energy and carbon of the existing building before any proposal for demolition is considered. The use of durable, long-lasting materials such as those used to construct the school can reduce refurbishment cycles, therefore requiring less energy and carbon long-term. Retaining existing buildings and seeking to enhance their energy performance in sensitive ways is in keeping with building conservation, and sustainability.

The *“much-needed affordable housing”* can be adequately provided for through the conversion of the school. In recent years, more regard has been given to sustainability and there has been an increasing move towards the conversion of historic school buildings for residential use. A pertinent and relatable example to the school is the former Manor Lodge Primary School, Sheffield which has been converted into c. 18 apartments with bungalows constructed around it (Sheffield City Council Planning Application Reference: 13/03845/FUL).

For these reasons we urge your authority to withhold consent and seek further justification for, and revisions to, these proposals. I would be grateful if you could inform me of your decision in due course.

Yours sincerely

Esther Robinson Wild

**Interim Conservation Adviser**