



**Aberthin Road,
Cowbridge**

**Archaeological
and Heritage
Assessment**

Prepared by:
**The Environmental
Dimension
Partnership Ltd**

On behalf of:
**Hafod Housing
Association**

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Non-technical Summary

- S1 This Archaeological and Heritage Assessment has been prepared by The Environmental Dimension Partnership Ltd (EDP), on behalf of Hafod Housing Association, to inform planning proposals for the demolition of extant buildings, formerly associated with Cowbridge Comprehensive School, and development of 34 dwellings with associated landscaping works, on land at Aberthin Road, Cowbridge, Vale of Glamorgan (known as 'the site').
- S2 The site does not contain any world heritage sites, scheduled monuments, registered historic parks and gardens or listed buildings.
- S3 No designated historic assets within the vicinity of the site have been identified that are at risk of having their significance harmed by the proposed development, either in terms of an effect on their physical form/fabric or through change to the contribution made by their setting. This includes the Cowbridge Conservation Area, the setting of which is assessed as being unaffected by the proposed development.
- S4 The site contains buildings of the former Cowbridge Comprehensive School. The main school building dates from 1896 and 1908. The building was assessed by Cadw as of insufficient architectural and historic interest to be worthy of statutory protection as a listed building. It is considered to represent a non-designated historic asset, of low significance that is not Locally Listed. The proposed development will result in the total loss of these buildings.
- S5 Under Planning Policy Wales (PPW) Edition 10 Paragraph 6.1.25, the relative importance of the asset should be weighed against other factors, including the need for the proposed development. The loss of the building would be in conflict with Policy SP10 of the Local Development Plan (LDP) which states that the architectural and historic quality of any building must be preserved. This broad statement is considered unrealistic, as it could be applied to most buildings in the Vale of Glamorgan, regardless of their planning status, where planning permission is being sought. Given this understanding, it is suggested that the weight given to Policy SP10 be reviewed accordingly.
- S6 It should also be considered that, in the LDP, the site is allocated for residential development under Policy MG2 (18), and that whilst the allocation suggests that the building '*lends itself to conversion*' it does not state explicitly that the school building should, or must, be preserved. In this respect the potential loss of the building and the development of the site for housing is already established in principal.
- S7 The site also contains a boundary wall and railings associated with the former school, these are considered to represent an historic asset of low significance closely related to the school. The proposed development will retain and repair this boundary feature, which will continue to represent a feature of the roadside.

- S8 Evidence on the HER suggests that there is a moderate potential for prehistoric archaeology within the site, and a low potential for archaeology of other periods. However, it is considered that any archaeological remains located within the footprint of the former school buildings are likely to have been damaged or destroyed. Likewise, historic landscaping within the school grounds is also likely to have resulted in at least some degree of damage or destruction of archaeological remains located within the site.
- S9 Consultation with the Archaeological Planning Officer at GGAT resulted in a request for the site's archaeological potential to be investigated through a programme of archaeological trial trenching. These works would seek to identify the depth of disturbance caused by the landscaping within the school grounds, and thus conclude as to the potential for the survival of archaeological remains in these areas. On account of the site's allocation, it is not considered that this work should need to be carried out prior to the determination of the planning application.
- S10 GGAT and the Conservation Officer have requested that, if the main school building is to be demolished, the demolition be preceded by a programme of historic building recording, requested through a condition attached to planning permission.

Section 1

Introduction

- 1.1 This report has been prepared by The Environmental Dimension Partnership Ltd (EDP), on behalf of Hafod Housing Association, to inform planning proposals for residential development of land at Aberthin Road, Cowbridge, Vale of Glamorgan (the site).
- 1.2 The first aim of this Archaeological and Heritage Assessment is to understand the heritage significance of the buildings of the former Cowbridge Comprehensive School, which are located within the site. The assessment will also aim to establish whether the buildings are within the setting of the Cowbridge Conservation Area, and (if so) to determine whether, and to what extent, any change to its setting from development would affect its special interest. The assessment has been carried out in accordance with the guidance set out in Cadw's *Setting of Historic Assets in Wales* (published on 31 May 2017).
- 1.3 The second aim of this assessment is to provide comment on the site's archaeological potential, in accordance with the guidance in Planning Policy Wales (Edition 10), Technical Advice Note 24 (TAN 24) and local planning policy. This will consider a selection of available historical and archaeological resources for the site and, in accordance with best practice, the desktop sources have been augmented through the completion of a walkover survey, which in this case was undertaken in August 2018.

Location and Boundaries

- 1.4 The site is approximately 0.53 hectares (ha) in size and located adjacent to Aberthin Road to the immediate south of the A48, on the eastern edge of the town of Cowbridge, Vale of Glamorgan. The town centre is situated approximately 600m to the west.
- 1.5 The site comprises a plot enclosed by a boundary wall consisting of metal railings and/or rubble stone walls, set between stone piers, on its south-west and south-east sides, garden hedges on its north-west side, and a modern metal fence on its north-east side. It contains the buildings of the former Cowbridge Comprehensive Sixth Form School (associated with Cowbridge Comprehensive School), areas of hardstanding and trees.
- 1.6 The site is centred on National Grid Reference (NGR) ST 00039 74590; its location and layout are shown on **Plan EDP 1**.
- 1.7 The property is bordered by residential dwellings to the south and west with a row of houses along Aberthin Road to the east, beyond which is woodland and agricultural land. To the north is the A48 dual carriageway set on a raised flyover, with the grounds and buildings of the modern Cowbridge Comprehensive School beyond.

Geology and Topography

- 1.8 The underlying bedrock geology at the site is Mercian Mudstone Group (British Geological Survey, 2018). Superficial deposits are also recorded consisting of Glaciofluvial Deposits, of Devensian Sand and Gravel.
- 1.9 The site is located on flat land at approximately 36m above Ordnance Datum (aOD).

Proposed Development

- 1.10 The proposed development is illustrated on the Site Layout Plan at **Appendix EDP 1** (Pentan, 3703 / PA / 210). In summary this comprises 34 flats, with 30 situated within a single block at the northern end/centre of the site, and four individual houses, with garden plots, located at the southern end. Car parking is proposed across the western part of the site, to the rear of the proposed buildings. Access to the development would be from a T-junction on Aberthin Road.
- 1.11 The development would replace the existing buildings on the site, which will be entirely demolished. The present stone wall and railings which mark the site's south-eastern boundary would be retained and repaired.

Consultation

Glamorgan Gwent Archaeological Trust (GGAT)

- 1.12 The Glamorgan Gwent Archaeological Trust (GGAT), the archaeological advisor to the LPA, provided a consultation response regarding the treatment of the buildings on site, and regarding the investigation of the site's archaeological potential. Emails outlining this response are included at **Appendix EDP 2**.
- 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.

Cadw

- 1.14 In December 2018, Cadw carried out an assessment as to whether the buildings of the former Cowbridge Comprehensive School are of sufficient architectural and historic interest to be designated as a listed building.

- 1.15 Cadw issued a statement via email on 4 February 2019 outlining that the building (presumably the main school building of 1896/1908) does not meet the published criteria for listing. This email is attached at **Appendix EDP 3**.
- 1.16 In summary, Cadw identified the follow points that identify the building as lacking sufficient special interest to qualify for listing:
- Limited quantity of original features and loss of original features such as windows and interiors;
 - Overall quality and character is not as good as at other similar schools of its type and period;
 - The school lacks a distinctive plan form and appearance and it has been altered, in some parts heavily;
 - The school has no specific historical associations with notable persons; and
 - Overall it has not survived as an especially good example of its type, its character compromised by alteration, with better examples that have been listed elsewhere.
- 1.17 The Cadw verdict reflects the assessment present in the current report that the school building represents an historic asset of only local importance and is of low significance.

Vale of Glamorgan Conservation Officer

- 1.18 Peter Thomas, Senior Planner (Conservation and Design), issued advice to the Vale of Glamorgan Council's Case Officer regarding the potential impact of the proposed development on historic assets and their settings on 7 February 2019. This advice is appended at **Appendix EDP 4**.
- 1.19 The advice recommends that the building is considered for inclusion on the Vale of Glamorgan Council's Local List of historic assets, known as County Treasures. It also recommends that the application be refused on the grounds that it results in the loss of an historic asset of local significance.
- 1.20 Peter Thomas outlines that, in his opinion, the building meets four out of five criteria as set out in the County Treasure Supplementary Planning Guidance (2009). It should be noted however that this document references a superseded Local Plan and is now out of date. It is currently scheduled to be reviewed (no timescale defined).
- 1.21 Peter Thomas's position is that the effects of the development would need to be considered against Local Development Plan Policy SP 10, in that the development would result in the loss of a 'building of architectural and/or historic quality'. Detail on this Policy is given in **Section 3** the current report.

- 1.22 It was confirmed, in a telephone conversation with Peter Thomas on 17 September 2019, that, as of that date, the building is not included on the Local List, but it is still recommended for inclusion at a future date when the list is next reviewed.

Section 2

Methodology

Assessment and Data Collection Methodology

- 2.1 This report has been produced in accordance with the *Standard and Guidance for Historic Environment Desk-Based Assessment* issued by the Chartered Institute for Archaeologists (CIfA, 2014) and *Heritage Impact Assessment in Wales* (Cadw, 2017). These guidelines provide a national standard for the completion of desk-based assessments and heritage impact assessments.
- 2.2 The assessment involved consultation of readily available archaeological and historical information from documentary and cartographic sources. The major repositories of information comprised:
- Information held by the GGAT Historic Environment Record (HER) on known archaeological sites, monuments and findspots within the vicinity of the site;
 - Historic maps and other documents at the Glamorgan Archives and online;
 - Aerial photographs and other relevant data held by the Central Register of Aerial Photography for Wales (CRAPW) at Cardiff;
 - The database for the Royal Commission on the Ancient and Historic Monuments of Wales National Monuments Record of Wales (NMRW);
 - Records held by the National Museum of Wales;
 - The Historic Wales online portal; and
 - Records made during a site walkover survey in August 2018.
- 2.3 This report provides a synthesis of relevant historic environment information for the site and a study area which extends for up to a 500m radius, centred on the site itself, and thereafter concludes with an assessment of its likely archaeological potential, made with regard to current best practice guidelines.
- 2.4 Where possible, the assessment of the significance of known and recorded historic assets, makes reference to the four 'heritage values' identified by Cadw within their *Conservation Principles for the Sustainable Management of the Historic Environment in Wales* document (Cadw, 2011).
- 2.5 These consist of:

- The asset's *evidential value*, which is defined as those elements of the historic asset that can provide evidence about past human activity, including its physical remains or historic fabric;
- The asset's *historical value*, which is defined as those elements of an asset which might illustrate a particular aspect of past life or might be associated with a notable family, person, event or movement;
- The asset's *aesthetic value*, which is defined as deriving from the way in which people draw sensory and intellectual stimulation from the historic asset; and
- 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.

Setting Assessment Methodology

- 2.6 The report also considers the nature and significance of any effects arising within and beyond the boundary of the application site; i.e. in terms of the settings of designated heritage assets.
- 2.7 In addition to the potential for direct impacts on the fabric of an asset, when assessing the indirect impact of proposals, it is important to ascertain whether change within its 'setting' would lead to a loss of 'significance'. This assessment is made according to Cadw's guidance *Setting of Historic Assets in Wales* (published on 31 May 2017).
- 2.8 In simple terms, setting '*includes the surroundings in which it is understood, experienced and appreciated, embracing present and past relationships to the surrounding landscape*' (Cadw, 2011). It must be recognised from the outset that 'setting' is not a heritage asset and cannot itself be harmed. The guidance states that the importance of setting '*lies in what it contributes to the significance of a historic asset*'.
- 2.9 As such, when assessing the indirect impact of proposals on designated heritage assets, it is not a question of whether their setting would be affected, but rather a question of whether change within the asset's 'setting' would lead to a loss of 'significance'.
- 2.10 Set within this context, where the objective is to determine the potential for development to have an indirect effect on heritage assets, it is necessary to first define the significance of the asset in question - and the contribution made to that significance by its 'setting', in order to establish whether there would be a loss, and therefore harm. The guidance identifies that change within a heritage asset's setting need not necessarily cause harm to that asset - it can be positive, negative or neutral.
- 2.11 Cadw's guidance (Cadw, 2017) sets out a four-stage approach to the identification and assessment of setting effects; i.e.:

- **Stage 1:** Identify the historic assets which might be affected;
- **Stage 2:** Define and analyse the setting, to understand how it contributes to the asset's heritage significance;
- **Stage 3:** Evaluate the potential impact of development; and
- **Stage 4:** Consider options to mitigate or improve that potential impact.

2.12 The assessment outlined below considers Stages 1, 2 and 3 of this process, as it relates to the scheme to develop the site, as outlined in **Appendix EDP 1**.

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Section 3

Legislation and Planning Guidance

Planning Policy Background

- 3.1 This section outlines the legislative and planning policy context, to the form of development proposed, at both the national and local levels.

Legislation

- 3.2 In March 2016, the Historic Environment (Wales) Act came into force. Whilst providing a number of new provisions to existing legislation, the changes do not specifically affect the planning process or the way archaeology and heritage is assessed.

Listed Buildings and Conservation Areas

- 3.3 The *Planning (Listed Buildings and Conservation Areas) Act* of 1990 is the primary legislative instrument addressing the treatment of listed buildings and conservation areas through the planning process in Wales.

- 3.4 Section 66(1) of the 1990 Act concerns listed buildings and states that:

‘...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.’

- 3.5 The ‘special regard’ duty of the 1990 Act has been tested in the Court of Appeal and confirmed to require that ‘*considerable importance and weight*’ should be afforded by the decision maker to the desirability of preserving a listed building along with its setting. The relevant judgement is referenced as ‘*Barnwell Manor Wind Energy Ltd v East Northants DC, English Heritage and National Trust*’ (2014) EWCA Civ 137.

- 3.6 However, it must be recognised that Section 66(1) of the 1990 Act does not identify that the local authority or the Secretary of State must preserve a listed building or its setting; and neither does it indicate that a development that does not preserve them is unacceptable and should therefore be refused.

- 3.7 This point is made very clearly in Paragraph 54 of the judgement regarding ‘*Forest of Dean DC v Secretary of State for Communities and Local Government*’ (2013), which identifies that:

‘...Section 66 (1) did not oblige the inspector to reject the proposal because he found it would cause some harm to the setting of the listed buildings. The duty is directed to ‘the

desirability of preserving' the setting of listed buildings. One sees there the basic purpose of the 'special regard' duty. It does not rule out acceptable change. It gives the decision-maker an extra task to perform, which is to judge whether the change proposed is acceptable. But it does not prescribe the outcome. It does not dictate the refusal of planning permission if the proposed development is found likely to alter or even to harm the setting of a listed building.'

- 3.8 In other words, it is up to the decision maker (such as a local authority) to assess whether the proposal which is before them would result in 'acceptable change'.
- 3.9 Section 72(1) of the *Planning (Listed Buildings and Conservation Areas) Act of 1990* sets out the statutory duty for a decision-maker where a proposed development would have an impact on the character and appearance of a conservation area.
- 3.10 This states that: '*...with respect to any buildings or other land in a conservation area, of any powers under any of the provisions mentioned in subsection (2), special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.*'
- 3.11 As far as Section 72(1) of the 1990 Act is concerned, it has previously been established by the Courts (*South Lakeland DC v Secretary of State for the Environment, [1992] 2 WLR 204*) that proposed development which does not detract from the character or appearance of a conservation area is deemed to be in accordance with the legislation. In other words, there is no statutory requirement to actively 'enhance'.
- 3.12 The preservation of the setting of a conservation area is not a statutory duty, being a planning policy matter only.

Archaeology

- 3.13 The '*Ancient Monuments and Archaeological Areas Act 1979*' addresses the designation and management of scheduled monuments, providing for the maintenance of a schedule of monuments (and archaeological remains) which are protected. The designation of archaeological and historic sites as scheduled monuments applies only to those that are deemed to be of national importance, and is generally adopted only if it represents the best means of protection.
- 3.14 The 1979 Act does not address the concept of 'setting', just their physical remains and, therefore, for scheduled monuments the protection of 'setting' is a matter of policy only.
- 3.15 In Wales, the written consent of the Welsh Minister is required for development that would impact upon a scheduled monument, and applications for Scheduled Monument Consent are submitted to Cadw, the Welsh Government's Historic Environment Service.

National Planning Policy

- 3.16 National planning guidance, concerning the treatment of the historic environment across Wales, is detailed in Section 6.1 of Chapter 6 *Distinctive and Natural Places* of Planning Policy Wales Tenth Edition, published in December 2018 (PPW 2018).
- 3.17 At Paragraph 6.1.2, it identifies the historic environment as comprising individual historic features, such as archaeological sites, historic buildings and historic parks, gardens, townscapes and landscapes, collectively known as '*historic assets*'.
- 3.18 At Paragraph 6.1.6 the Welsh Government's specific objectives for the historic environment are outlined. Of these, the following are of relevance to the current assessment. These seek to '*conserve archaeological remains, both for their own sake and for their role in education, leisure and the economy*'; and '*safeguard the character of historic buildings and manage change so that their special architectural and historic interest is preserved*'.
- 3.19 At Paragraph 6.1.7, it is stated 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.'*
- 3.20 As such, with regard to decision making, it is stated 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.*'
- 3.21 Regarding listed buildings PPW 2018 states, at Paragraph 6.1.10, that:
- '...there should be a general presumption in favour of the preservation of a listed building and its setting, which might extend beyond its curtilage'* and then adds that '*For any development proposal affecting a listed building or its setting, the primary material consideration is the statutory requirement to 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*'.
- 3.22 It then adds that: '*The aim should be to find the best way to protect and enhance the special qualities of listed buildings, retaining them in sustainable use*'.
- 3.23 Regarding conservation areas, it is stated at Paragraph 6.1.14 that: '*There should be a general presumption in favour of the preservation or enhancement of the character or appearance of conservation areas or their settings.*'
- 3.24 Paragraphs 6.1.15 and 6.1.16 state that:

'There will be a strong presumption against the granting of planning permission for development, including advertisements, which damage the character and appearance of a conservation area or its setting to an unacceptable level. In exceptional cases the presumption may be overridden in favour of development deemed desirable on the grounds of some other public interest', and that: 'Preservation or enhancement of a conservation area can be achieved by a development which either makes a positive contribution to an area's character or appearance, or leaves them unharmed.'

3.25 It is apparent that PPW does not state that *any* damage to the character and appearance of a conservation area would result in the refusal of planning permission. It is only damage that is of an *'unacceptable level'* which would result in a strong presumption against the granting of planning permission. The required judgement is concerned with what constitutes an *'unacceptable'* level of harm not whether there is any harm at all.

3.26 Regarding archaeological remains, PPW states at Paragraph 6.1.23, that: *'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.'*

3.27 It then adds at Paragraph 6.1.24 that:

'...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).'

3.28 At Paragraph 6.1.25 it states that:

'In cases involving less significant archaeological remains, planning authorities will need to weigh the relative importance of the archaeological remains and their settings against other factors, including the need for the proposed development.'

3.29 Paragraph 6.1.26 recommends that:

'...Where archaeological remains are known to exist or there is a potential for them to survive, an application should be accompanied by sufficient information, through desk-based assessment and/or field evaluation, to allow a full understanding of the impact of the proposal on the significance of the remains. The needs of archaeology and development may be reconciled, and potential conflict very much reduced, through early discussion and assessment.'

3.30 In situations where planning approval would result in archaeological remains being destroyed, at Paragraph 6.1.27, PPW 2018 states the following regarding the planning authorities' obligations:

'If the planning authority is minded to approve an application and where archaeological remains are affected by proposals that alter or destroy them, the planning authority must be satisfied that the developer has secured appropriate and satisfactory provision for their recording and investigation, followed by the analysis and publication of the results and the deposition of the resulting archive in an approved repository. On occasions, unforeseen archaeological remains may still be discovered during the course of a development. A written scheme of investigation should consider how to react to such circumstances or it can be covered through an appropriate condition for a watching brief. Where remains discovered are deemed to be of national importance, the Welsh Ministers have the power to schedule the site and in such circumstances scheduled monument consent must be required before works can continue.'

- 3.31 Finally, also of relevance to the current application, Paragraph 6.1.28 is concerned with Historic Environment Records (HERs). This states that:

'The statutory historic environment records for each local authority area are managed and kept up-to-date by the Welsh Archaeological Trusts on behalf of the Welsh Ministers. These records must be used as a key source of information in making planning decisions affecting the historic environment. Advice on their use in decision making should be sought from the Trusts.'

Technical Advice Note 24 (TAN 24)

- 3.32 Additional heritage guidance in Wales is set out in Technical Advice Note 24: The Historic Environment (Welsh Government, 2017).
- 3.33 TAN 24 provides *'guidance on how the planning system considers the historic environment during development plan preparation and decision making on planning applications.'*
- 3.34 It clarifies the policies and distinctions made in PPW. A definition for a 'historic asset' is given 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.'*
- 3.35 Effects through changes within the settings of designated historic assets are covered in TAN 24 at Paragraphs 1.23 to 1.29. These paragraphs define the setting of an historic asset as:

'...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.'

3.36 TAN 24 also provides advice on factors to consider when assessing effects on setting. Paragraph 1.26 requests that it is: *'...for the applicant to provide the local planning authority with sufficient information to allow the assessment of their proposals in respect of scheduled monuments, listed buildings, conservation areas, registered historic parks and gardens, World Heritage Sites, or other sites of national importance and their settings.'*

3.37 Paragraph 1.29 goes on to state that:

'The local planning authority will need to make its own assessment of the impact within the setting of a historic asset, having considered the responses received from consultees as part of this process. A judgement has to be made by the consenting authority, on a case-by-case basis, over whether a proposed development may be damaging to the setting of the historic asset, or may enhance or have a neutral impact on the setting by the removal of existing inappropriate development or land use.'

3.37 Of particular relevance is Section 6, which is concerned with conservation areas. Within this section, Paragraphs 6.6 and 6.7 are most relevant. These discuss *Planning within Conservation Areas*.

3.38 Paragraph 6.6 reiterates the policy that *'development proposals will be judged against their effect on the character or appearance of a conservation area as identified in the appraisal and management document.'*

3.39 Paragraph 6.7 states that development control within conservation areas should have *'an emphasis on controlled and positive management of change that encourages economic vibrancy and social and cultural vitality, and accords with the area's special architectural and historic qualities.'* It also states that *'Many conservation areas include sites or buildings that make no positive contribution to, or indeed detract from the character or appearance of the area; their replacement should be a stimulus to imaginative, high-quality design and an opportunity to enhance the area.'*

3.40 Finally, also of relevance to the application is Section 4, which is concerned with archaeological remains. This section outlines advice regarding consultation, archaeological assessment and the preservation, recording and understanding of archaeological evidence.

Local Planning Policy

3.41 Local planning policy for the Vale of Glamorgan is currently set out in the *Vale of Glamorgan Adopted Local Development Plan 2011-2026* (LDP) which was adopted on the 28 June 2017. The plan sets out the vision, objectives, strategy and

policies for managing development in the Vale of Glamorgan. It contains local planning policies and makes provision for the use of land through allocation.

- 3.42 The site is allocated within the LDP for housing development under Policy MG2 (18) – Housing Allocations. The site is allocated as Cowbridge Comprehensive Sixth Form Block, Aberthin Road (0.52 ha) for 20 housing units. With regard to heritage matters the allocation states that:

‘The Victorian school building has some architectural merit and lends itself to conversion although the building is not currently listed. GGAT have advised that an archaeological evaluation will be required and that some parts of the site may need to be retained as open space in order to protect archaeological features.’

- 3.43 It should be noted that the Policy does not explicitly state that the school building should be preserved, rather simply that it ‘lends itself to conversion’ but is not listed, and thus not subject to statutory protection. If conversion is not possible then it is presumed that the Policy would allow for the building’s demolition.
- 3.44 The following policies within the LDP document include elements which are relevant to the historic environment and therefore potentially relevant to the proposed development within the site. These include an overarching Strategic Policy (SP10) and a more specific Managing Development Policy (MD8).

Policy SP10 – Built and Natural Environment

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. Historic Landscapes, Parks and Gardens;*
- 3. Special Landscape Areas;*
- 4. The Glamorgan Heritage Coast;*
- 5. Sites designated for their local, national and European nature conservation importance; and*
- 6. Important archaeological and geological features.*

Policy MD8 – Historic Environment

Development proposals must protect the qualities of the built and historic environment of the Vale of Glamorgan, specifically:

1. *Within Conservation Areas, development proposals must preserve or enhance the character or appearance of the area;*
 2. *For listed and locally listed buildings, development proposals must preserve or enhance the building, its setting and any features of significance it possesses;*
 3. *Within designated landscapes, historic parks and gardens, and battlefields, development proposals must respect the special historic character and quality of these areas, their setting or historic views or vistas; and*
 4. *For sites of archaeological interest, development proposals must preserve or enhance archaeological remains and where appropriate their settings.*
- 3.45 It should be noted that neither Policy SP10 or MD8 accords precisely with national planning policy and heritage legislation.
- 3.46 Of relevance to the current application, Policy SP10 states that the '*built and natural environment and heritage of the Vale of Glamorgan*' must be preserved and, where appropriate, enhanced in the face of development. This includes '*the Architectural and / or historic qualities of buildings*'. The wording of the policy implies that the architectural and historic qualities of any building must be preserved regardless of its planning status. By this policy any and all buildings in the Vale of Glamorgan which display any architectural or historic quality of any degree should be preserved where planning permission is being sought. This notion is clearly unrealistic, as it could apply to just about any building in the region.
- 3.47 This statement indicates that, in order to preserve their 'architectural and historic quality', non-designated historic assets (such as non-listed buildings which possess a degree of heritage significance, and which are not on a Local List) must be preserved. This conflicts with PPW Edition 10 which, for want of a more precise definition, considers such assets as 'archaeological' under Paragraph 6.1.25. Under this policy, for impacts upon non-designated archaeological assets '*planning authorities will need to weigh the relative importance of the archaeological remains and their settings against other factors, including the need for the proposed development.*'
- 3.48 In this respect, rather than insisting on preservation (as per LDP Policy SP10) the loss of non-designated remains of heritage significance would need to be weighed in the planning balance by the decision maker, with consideration for their relative importance.
- 3.49 Regarding Policy MD8, the policy states that, at (1), development proposals '*must*' preserve or enhance the character and appearance of a conservation area. It is stated in Paragraph 6.5.21 of PPW that it is only damage of an '*unacceptable level*' which would result in a strong presumption against the granting of planning permission. This implies that an '*acceptable*' level of harm should be tolerated.
- 3.50 A similar observation is made with regard to (2) in that for listed and locally listed buildings, it is stated that proposals '*must preserve or enhance the building, its setting*

and any features of significance it possesses'. This level of protection is beyond that ascribed by the 1990 Act to listed buildings, which, as described above states that '*special regard*' should be given to '*the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses*' not that these buildings and their settings must be preserved and enhanced. In this respect, the policy is out of line with national legislation.

- 3.51 Whilst the application will have to be considered against all adopted policies, given the discrepancy between local policy and national policy, it should be questioned as to how much weight should be afforded to Policies SP10 and MD8 of the LDP, and whether PPW Edition 10 has greater applicability, given its more considered and nuanced position in relation to the historic environment.

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Section 4 Existing Information

Designated Heritage Assets

- 4.1 The site does not contain any designated 'heritage assets', such as scheduled monuments, listed buildings, or historic parks and gardens, where there would be a presumption in favour of physical retention or preservation *in situ*. Furthermore, no part of the application site is located within or adjacent to a conservation area or registered historic landscape area.
- 4.2 As previously described, the potential for the proposed development to change the settings of designated historic assets within its wider zone of influence has been assessed following the Cadw guidance (Cadw 2017).
- 4.3 Stage 1 of the setting assessment process sought to identify any designated historic assets which might be affected by the site's development. With reference to desk-based sources of historic environment data, it was concluded that there are no designated historic assets in close proximity to the site. As the site is surrounded by modern housing, it was deemed likely to be well screened from the wider, surrounding landscape.
- 4.4 The closest designated asset to the site is the Cowbridge Conservation Area (**Plan EDP 1**), the edge of which is located approximately 130m to the south-west. Because of the screening effect of the housing surrounding the site, it, and the listed buildings therein, were considered to be the only designated assets thought to have potential for their settings to include the site, and thus be potentially affected by the proposed development. As such, these assets have been considered in greater detail below.
- 4.5 Given the restricted views to and from the site, it was considered very unlikely that any other designated heritage assets could be experienced in conjunction with the site, and no evidence was forthcoming that suggests a specific historical relationship between the site, the buildings therein, and any other designated asset in the wider area.

Cowbridge Conservation Area

- 4.6 The Special Interest of the Cowbridge Conservation Area is described in a Conservation Area Appraisal and Management Plan (Vale of Glamorgan Council, 2010). The appraisal describes the two historic settlement areas of Cowbridge and Llanblethian, which are in relatively close proximity to each other. Since the appraisal was produced, and in accordance with its recommendations, the conservation area has been split into two parts reflecting the two separate historic settlements.
- 4.7 The appraisal defines the characteristics that reinforce the conservation area's Special Historical and Architectural Interest, for the two separate settlements. The site is located closest to Cowbridge (the conservation area boundary being c. 130m to the

west), with Llanblethian located c. 1.4km to the south-west. As such, it is the characteristics of Cowbridge that are most relevant to the site. These are described in the appraisal as:

- *Small historic town of outstanding archaeological and historic merit. Many sites exhibit historic 'layering' of multiple periods;*
- *Historic core of settlement reflects the plan of the walled town planted in the 13th century with vestiges of the walls remaining and extant South Gate;*
- *Strong east-west alignment of plan from Eastgate – High Street – Westgate with enclosing historic frontages;*
- *Bridging point across the River Thaw and river setting;*
- *Important terraces of historic buildings along the prime historic frontage of diverse architectural character, with many identified listed buildings;*
- *Key listed buildings including the Town Hall, Holy Cross Church and Churchyard, South Gate, former Cowbridge Grammar School and the Great House;*
- *Important sequences of open space to the south of the east-west principal road alignment including Old Hall Gardens, the Physic Garden, Holy Cross Churchyard, the Twt and gardens along the River Thaw;*
- *Enclosed historic courtyards to the north and south of the principal historic frontage in High Street, such as Verity's Court;*
- *Important 18th century period detailing of historic frontages reflecting the prosperity of the town in the period as a coaching town and regional centre; and*
- *Important 16th and 17th century detailing, in particular to interiors.*

4.8 The site is located beyond the extent of the conservation area, and as such, it is its position in relation to the conservation area's setting that is of most relevance to the current assessment. The appraisal describes how the historic town was laid out along a main road, forming a strong east-west axis to the plan form, with buildings set within elongated burgage plots either side, often with continuous frontages onto the main road. The town was walled, with east and west gates, giving rise to the modern names of its east and west parts. Given this roadside form, and positioning of its historic buildings, the conservation area's built heritage is best experienced from the roadside, on which historic properties have their frontages. However, the appraisal identifies that views to the historic core from the rear of buildings are also important, as these include an experience of historic elements such as boundary walls, and former outbuildings.

- 4.9 The village is set on the slopes of the valley of the River Thaw, with the river passing to the south-east of the historic town. The valley is well-defined by surrounding hills, and the town's valley-setting is easily experienced when approaching along the A48 from both east and west. The appraisal describes how remaining open land around the historic core represents the more immediate setting of the historic town, including land on the river's flood plain, and to the north between the town and the A48 bypass. Much of the historic town's surroundings have been developed for modern housing, which has changed its plan form, and imposed upon this historic open land to a degree.

The site in relation to the conservation area

- 4.10 The site is located closest to the East Village (or East Gate) part of the conservation area. This area reflects linear, historic roadside development along the main axial road that runs through Cowbridge; curving south-east in this location. The conservation area boundary follows closely the edge of the burgage plots of the roadside dwellings in this area, with some additional inclusion of areas on the eastern fringe of the settlement.
- 4.11 As in general within the conservation area, views are restricted by the dense, continuous frontages along the main road, and there are few occasions where views out beyond the roadside area are possible.
- 4.12 The site, and former school buildings therein, is located 130m from the edge of the conservation area. Historically, the land between the school and the town was occupied by a railway, the town's station and a rail goods station and sidings. None of these features are still extant, having been entirely built over by modern residential housing estates in the 20th century.
- 4.13 The school buildings are not visible in views from the edge of the conservation area, north along Aberthin Road. This view is dominated by the presence of modern houses and modern amenity buildings, such as a fire station. Likewise, also due to intervening buildings, the school buildings are not visible from any of the open spaces which surround the historic core of the village, or from the historic core itself. On the approach to the conservation area from the east, along East Gate Road, the school buildings are not visible. Principally, this is due to high hedgerows which line the northern edge of the roadside, but views would probably also be screened by trees on the eastern edge of modern gardens on Aberthin Road regardless.
- 4.14 A very limited experience of the site is had when passing on the A48 flyover. From there, the roofs of the school buildings are seen, with the extent of the town skyline in the backdrop. This view is only achieved from a passing car, and is very fleeting, and its content is partially screened by barriers along the dual carriageway. As such, it offers a very poor experience of the school buildings, in which they are only apparent as one of many buildings set on the edge of the town and are not seen clearly in conjunction with the town's core historic areas or historic buildings. As such, these very brief and limited views are considered of little relevance to the conservation area's special interest.

- 4.15 Given the lack of experience of the school buildings in conjunction with the historic elements of the conservation area, it is considered that they are not part of its setting, such that their presence might contribute to the character and appearance of the conservation area's 'special interest'. The buildings are related historically to the town's late Victorian history and municipal development; however, the conservation area appraisal does not mention them, or their history, suggesting that they have little relevance to the special historic interest that characterises the conservation area. The school buildings are related more to the general, modern history of the wider locality, representing a typical educational development, similar to that which occurred in many other locations, and which is not in itself unique to Cowbridge.
- 4.16 As such, the site and the buildings therein, are not considered to represent part of the setting of the Cowbridge Conservation Area and make no contribution to the conservation area's 'special interest'.

Non-designated Heritage Assets

Cowbridge Comprehensive School

- 4.17 The buildings of the former Cowbridge Comprehensive Sixth Form School are located within the site, occupying much of its extent. They represent the principal historic asset within the site. The paragraphs below describe their history, with reference to archive material, historic maps and aerial photographs. The buildings are described, and their significance assessed, with reference to images taken during the site walkover survey.

Historical Background

- 4.18 The school was established as the Cowbridge Intermediate School for Girls, opened 3 November 1896, under the provisions of the Welsh Intermediate Education Act (1889). The need for appropriate education for girls had been recognized by John Bevan of Cowbridge who acted as a benefactor for the initial development. He funded the establishment of a hostel at the school (which accommodated 12 girls) and the school library, and undertook the cost of laying out the grounds, as well as establishing a scholarship fund.
- 4.19 The initial school accommodated 40 students in 1896, with numbers rising to 70 in 1906. In response, a laboratory, gymnasium and classrooms were added, which were completed in 1908. In 1912, Cowbridge lost its intermediate status when Mountain Ash acquired its own school, as Glamorgan Education Authority had already reached its maximum level of 13 intermediate schools. The school then became officially known Cowbridge Secondary School but unofficially was known as a 'high school', a status recognised by the education authority in 1950.
- 4.20 The school retained its boarders until 1939, and school numbers rose to 150 in 1918 and 240 in 1956, necessitating the construction of additional facilities in 1955 – 1957. Further development on the site largely ceased after that period, owing to loss of land for

the Cowbridge by-pass, and the phased construction of a new school on an adjoining site, which occurred in the 1960s. Following this development, in the 1970s, the school became an outlying facility of the modern Cowbridge Comprehensive School (Glamorgan Archives).

Early Maps

- 4.21 The earliest map to depict the site is the 1840 Tithe Map of Llanblethian (**Plan EDP 4**). This map shows that the site, prior to its development for the school, represented part of the south-eastern end of an agricultural field, located to the north of a track leading to a former mill. The mill was formerly situated c. 150m west of the site, having since been demolished for modern housing. The track to the mill still partially survives, situated to the south-west of the site boundary, leading off Aberthin Road.
- 4.22 The Tithe Map Apportionment gives the name of the site as West Field. The field name does not suggest that there was ever a building present or anything significant about the field during this period of use.
- 4.23 The First Edition Ordnance Survey map of 1877 (not shown) illustrates the initial development of the land to the south-west of the site for railway infrastructure. This would have altered the general, agricultural character of the landscape, and divided the field in which the site was situated, leading to the establishment of the site's present boundary.
- 4.24 The Second Edition Ordnance Survey map of 1899 (**Plan EDP 4**) gives the first planned depiction of the school after its construction in 1896. The layout of the original building (situated at the southern end of the site), was roughly 'Z-shaped' with buildings partially enclosing two areas which are likely to have been courtyards, one facing Aberthin Road, and one to the rear of the building. The map also depicts a small enclosed area to the north-west of the school, containing a small ancillary building.
- 4.25 The Third Edition Ordnance Survey map of 1919 (**Plan EDP 5**) shows the extensions to the school documented from 1908. It is evident that the existing building was retained and extended, through the construction of a series of bays, to the north-east. Extension is also evident to the south-easternmost wing of the old building. An extended enclosure is also shown to the north-west.
- 4.26 The next detailed depiction of the site is from an Ordnance Survey map of 1971-1972 (**Plan EDP 5**). This shows the older buildings with the same layout as in 1919, and a new building to the north-west. Smaller, ancillary buildings are shown to the west which include the small building first shown in 1899. At present this small building is no longer extant. It is likely that the new buildings represent those constructed in the 1950s in response to the school's expansion, but prior to the construction of the modern school to the north-east.

Aerial Photographs

- 4.27 A total of 18 aerial photographs covering the site and its immediate environs were identified within the collection maintained by the Central Register of Aerial Photography for Wales (CRAPW) in Cardiff.
- 4.28 The available images span the period from March 1944 to January 2014 and largely corroborate the land use and development sequence shown on 20th century Ordnance Survey maps.
- 4.29 Aerial photographs from the 1940s show the school as it is shown on the map of 1919, with new buildings first depicted on an image of 1956. The aerial photographs illustrate that the small outbuildings to the north-west of the school were demolished between 1967 and 1990, when they are shown as having been replaced by a car park.

Archival Research

- 4.30 The Glamorgan Archives were visited in October 2018 to observe available documents, plans and maps relating directly to the school building and its history, and also to assess what the site was used for prior to the school's construction.
- 4.31 No information was available regarding the site prior to the school's construction in 1896, other than the aforementioned Tithe Map of Llanblethian.
- 4.32 The earliest documents referring to the school are plans of the boundary walls for the Cowbridge Girls' Intermediate School from September 1896 (Ref: D833/29) (**Image EDP 1**). These consist of a plan and drawings of the boundary walls by Robert Williams (Architect).
- 4.33 The present day boundary walls are the same as those in the plans, however they display some damage and the plans illustrate that the road level was, at the time, lower than it is currently.
- 4.34 Photographs of the school buildings were available to view from 1930, 1964 and 1980 (**Images EDP 2 to 6**). These represent a record of the school's appearance and its setting between 1930 and 1980. The photograph dated 1964 is particularly useful, as it shows the school towards the end of its time as an independent school, with all structures associated with the school *in situ*. There were no photographs of the original building prior to alterations in 1908 at the archives.
- 4.35 The school produced an annual magazine, two of which were available to view. These were dated July 1956 (Issue No. 6) and July 1957 (Issue No.7).
- 4.36 The Cowbridge High School for Girls magazine (July 1956) states that additional school buildings were constructed in 1955. Issue No.7 dated July 1957 provides information on some new school classrooms:

'Since our last school magazine, the number of girls in the Junior School has been almost doubled owing the fact that now about sixty girls enter the school after the Scholarship instead of the usual thirty. New classrooms are under construction on the old hockey pitch to accommodate the extra pupils.'

Description of the school buildings

- 4.37 The school buildings were visited during the site walkover. It is apparent that the older part of the building (completed in 1896) is in the same architectural style as the later part (completed in 1908), utilising the same palette of materials. It is highly likely that the extension was intended to represent a development of the same building, rather than an attempt to introduce a new style, to represent a new phase in the school's development.
- 4.38 The building has a typically late-Victorian architectural style, blending Classical elements with Gothic elements. The building is constructed in local, dressed, sandstone blocks arranged in random courses with 'jumpers' where larger stones bridge multiple courses. The roof is finished in slate. In this respect the building is constructed of materials typical to local Victorian buildings, both in the Cowbridge area and across South Wales.
- 4.39 A typically Gothic form, employed throughout the building, is for steeply pitched roofs with pointed gable ends. The older part of the building consists of four parts, set at right angles to each other, consisting of one and two-storey gable ended blocks (**Image EDP 7**). The 1908 extensions consisted of adding additional, similar blocks, either full sized extensions set at right angles to the existing building parts, or, at the north-east end of the building, three consecutive, conjoined, single-story buildings (**Image EDP 8**). **Plan EDP 3** illustrates the plan of the building and the respective ages of its constituent parts.
- 4.40 The original building at the south-west end of the complex is the only two-storey part, and is likely to have represented the 'main' school building. The 1908 additions consist of a south-west to north-east aligned building with a forward-facing gable on its south-east elevation, facing the road (**Image EDP 9**). The buildings' forward facing gables on both its south-east and north-west elevations (**Image EDP 10**) are reminiscent of 'Dutch Gables' typical of late Victorian architecture. These gables contain varied decorative features such as Bath Stone banding and slit windows.
- 4.41 Other 'Gothic' features include pointed dormers, containing round, rectangular and arched windows which are present as a feature of the roof of the 1896 building, and which contain Bath Stone decorative elements, such as stone frames around the windows. The building's side and gable elevation windows reflect a more typically 'Classical' style; mostly comprising tall narrow openings, with rectangular Bath Stone lintels and sills, some with decorative stone arches above the lintels (**Image EDP 8**). Windows on the rear facing north-west elevations are generally smaller and some are paired. Windows designed to provide stair lights are in places staggered, with a zig-zag form, following the ascension of the staircase (**Images EDP 6 and 11**). The windows are presently for the most part boarded over, however historic photographs (**Images EDP 2 to 5**) indicate that they were divided by mullions into multiple small sections.

- 4.42 The four parts of the building at the north-east end, and the extension on the north-west part of the building, have in their south-east facing gable ends three large rectangular windows set at different heights, with the far north-east part (considered likely to have been the school's gymnasium) displaying a single, large arched window, with a decorative, classical style, Bath Stone arch above (**Image EDP 12**). Metal mullions are visible on these windows, which are likely to have replaced original wooden mullions. The three parts, at the north-east end, added in 1908, also have high slit windows set in their gables, another 'Gothic' style feature.
- 4.43 Entrances are single height, simple entrances, the main south-east facing entrance displaying Bath Stone quoins. The north-west side of the building is set slightly higher than the ground surface, and in response, entrances on this side are approached by short flights of step, set at right angles to the building.
- 4.44 Other decorative features include Bath Stone bands located beneath the first-floor windows (on the south-east facing elevations of the building), and under the eaves, and prominent, stone-built chimneys.
- 4.45 It is apparent that the building is being encroached upon in places by vegetation which is clearly having a detrimental effect on its fabric (**Image EDP 13**). It is also apparent that in some places, stonework is damaged and, as noted above, windows are missing and boarded over.
- 4.46 Some outbuildings have survived. These include a stone, single storey, flat roofed building located immediately adjacent to the older school building (**Image EDP 14**). This is a plain building with only few windows. It is first shown on an aerial photograph of 1956 and is contemporary with the 1950s phase of renovations at the school.
- 4.47 Another flat roofed, L-shaped building is located adjacent to the old school building on its north-west side (**Image EDP 14**). This building was added in the 1950s, and unlike the main building, is panel-built, in modern materials. This building is in a dilapidated state, with parts of whole elevations entirely boarded up.
- 4.48 A low section of stone wall is located in the open space to the west of the old school buildings (**Image EDP 14**). This is in the same location as the two small buildings, known to have been demolished prior to 1990, and is probably a remnant of these structures.
- 4.49 The school is partially enclosed by a stone-built wall. The south-east boundary consists of a low stone wall, with regular piers capped with pointed stone finials (**Images EDP 7 and 8**). Iron railings run between the piers, and entrances contain low iron gates. Part of the boundary wall on the southern side of the site (**Image EDP 15**) is constructed in rubble stone, and although it also displays similar piers to the south-east side, it has a more 'rustic' appearance, and may originate as the wall bounding the farm track that was once in this location, prior to the construction of the school.

Significance of the building

- 4.50 The assessment of the significance of the building references the four forms of heritage value outlined in Cadw's Conservation Principals (2011). In addition, in the absence of any specific Welsh guidance on assessing the significance of school buildings, or any thematic study, the assessment also considers Historic England's published study on historic schools; *England's Schools: History, architecture and adaptation* (English Heritage 2010). This is considered relevant in this case, as, although it is built in a differing Welsh context, the Cowbridge School fits historically into a UK wide drive for school provision in the late 19th century following the 1870 Education Act.

Evidential Value

- 4.51 The school has a degree of value inherent in its architecture. The school's architecture is principally functional, the variety in the different parts of the building reflecting their different uses, but as is evident, the school was also built with an aesthetic quality, designed to mark it out as a school, distinct in its appearance from other municipal buildings in the locality.
- 4.52 As described, the building is a typical late Victorian municipal building, adopting a variety of influences in its style, which were derived from past architectural movements. In the case of the school, the form of the building is reminiscent of medieval Gothic architecture, but with much of the detailing in a more Classical style.
- 4.53 In this way it is reminiscent of the 'Queen Anne Style' which combines Italianate and Gothic styles, and which was adopted as the typical architectural style of late 19th century school buildings in England, constructed in response to the 1870 Education Act (HE, 2010, 36-45). The Cowbridge School displays many of the typical features of this period of school building, with large windows, to light classrooms and halls, and rows of gables fronting the building. It has some local variation, in that it is rendered in materials typical to South Wales, which reflect the industrial-era architecture of the region.
- 4.54 The school is however late for a 'Queen Anne Style' building, with the earliest examples built in the 1870s, and with the style persisting only into the early 20th century. Furthermore, it is not especially large or complex.
- 4.55 The school's evidential, architectural value is the prime heritage interest of the school. However, this is not considered to be particularly great, as the school is a fairly typical school building for its era, and it is likely that other, similar buildings are present elsewhere in the Vale of Glamorgan, as the school was built in a period in which many new schools were constructed.
- 4.56 The school's architectural interest is considered to reflect a low degree of heritage significance, insufficient to warrant any consideration as an asset of 'national importance'.

Historical Value

- 4.57 The history of the Cowbridge School has been described already. Its construction was in response to the Welsh Intermediate Education Act (1889), which (following the 1870 Education Act) reflected a drive to provide educational facilities across Wales for children above Primary school age. The result was the Intermediate schools, which led ultimately to the development of the modern secondary schools.
- 4.58 In a local context the Cowbridge School represented the earliest stage of secondary provision for girls in Cowbridge, eventually leading to the modern Secondary school located to the north-east. In this respect the school is of some local historical interest, illustrating a phase in the development of the area's school, and in particular of girls' education. It also has local interest through its association with the local landowner and philanthropist John Bevan.
- 4.59 Within the wider historic context, the school is not considered to be particularly important, being one of 13 Intermediate Schools in Glamorganshire, and one of many constructed across Wales. As such, this aspect of its value is considered to be only of local interest, reflecting a low degree of heritage significance.

Aesthetic Value

- 4.60 The school was constructed with decorative features, inherent in its use of materials, stonework, and the form of its main elevations. This value is compromised to a degree by the current derelict state of the school and its grounds, which detracts from its value, and which serves to further erode the building's fabric.
- 4.61 However, the building is evidently an attractive building constructed in an era in which municipal buildings were built with decorative features, and represents a locally prominent building, albeit located beyond the fringe of the historic town. As such the building is considered to possess a moderate degree of aesthetic value.

Communal value

- 4.62 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. 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.

Conclusion

- 4.63 In conclusion, the school buildings are valued for their architectural interest or evidential value, which, due to their decorative architecture extends to encompass their aesthetic value. This aspect is fairly typical to its era, with the school reflecting the typical, decorative style of school buildings in the late Victorian period. A degree of value is also reflected by the building's history including its communal value, which is of importance in

terms of the local history of Cowbridge, rather than it possessing any wider, historical significance.

- 4.64 In this respect, the 1896/1908 school building and its associated contemporary boundary wall, are considered to represent an historic asset, but not one possessing such a degree of significance so as to be considered 'nationally important'. The building represents a local development, utilising an attractive, but commonly found architecture typical of the period, and thus should not be considered of equivalent significance to a listed building, being considered to represent a non-designated asset of low significance.
- 4.65 This assessment is in line with the recommendation of GGAT, outlined in **Section 1**, which did not suggest that the building is of such significance that it should be preserved *in situ*, rather that its likely demolition should be mitigated through a programme of building recording.
- 4.66 It should be noted that, as of September 2019, the building is not included on the Vale of Glamorgan Council Local List (County Treasures) and thus represents a non-designated historic asset, but not one that is Locally Listed.
- 4.67 The later components of the site, such as the dilapidated modern building and flat roofed stone building, which both date from the 1950s, are not considered to possess any architectural interest, and are not considered to represent historic assets.

Archaeology

- 4.68 There are no non-designated heritage assets recorded on the GGAT HER or the NMRW within the site. There are 45 HER monument records within a 500m radius of the site and 39 records on the NMRW. The locations of all HER and NMRW entries are identified on **Plan EDP 2**. The paragraphs below represent a summary of the site's archaeological potential based on this data.
- 4.69 The majority of these entries relate to finds, features and historic buildings located within the historic core of the settlement of Cowbridge, principally within the Eastgate area, which extends across the study area. For example, 34 out of the 45 HER records, and 38 of the NMRW entries are located close to the main road through the town, in its close vicinity.
- 4.70 These records relate to the town's archaeology and history, but have little relevance to the archaeological potential of the site itself, besides providing general background information. As described above, with reference to historic maps, the site is likely to have comprised agricultural land throughout the historical periods, and there is no evidence for it having been part of the medieval or post-medieval settlement at Cowbridge.
- 4.71 It is apparent that there is a degree of potential for prehistoric archaeology in and around the site. This reflects consultation comments made previously by GGAT (detailed in **Section 1** above).

- 4.72 The HER records prehistoric archaeology in close proximity to the site. The closest record relates to a Bronze Age burial (**01481s, 00333s**) and accompanying bronze knife discovered during the development of the modern school in the 1950s, with the record located c.5m to the north of the site. Located c.55m south of the site, on the site of the Cowbridge Railway Station, in 1891, a Neolithic axe (**02442s, 00247s**) was discovered. Another Neolithic axe (**00319s**) was also discovered c.340m north of the site in 1977.
- 4.73 All other prehistoric entries within the study area reflect archaeology related to the Neolithic or Bronze Age periods. These include a Bronze Age monolith (**00269s**) c.215m south-west of the site, now outside a house in the centre of Cowbridge, a polished axe c.340m north of the site (**00319s**) and a Bronze Age flint findspot (**02453s**) c.730m west of the site.
- 4.74 Given the evidence from areas close to the site, it is considered that there is a moderate potential for the site to contain similar prehistoric archaeology, possibly consisting of remains related to funerary activity.
- 4.75 The records within Cowbridge indicate Roman occupation in the same location as the later medieval town. All Roman features recorded within the study area are located over 400m to the west of the site, within the centre of Cowbridge. These features comprise substantial evidence for the Roman occupation of Cowbridge including a 13 room Roman bathhouse (**01586s**) c.500m west of the site, numerous ditch and pit systems (**01528s, 05224s, 00893s, 01866s**), multiple examples of 1st and 2nd century pottery (**01724s, 01726s, 01725s, 01727s, 01950s**), a bronze hairpin and roofing tiles (**01726s**), a Roman coin (**00253s**) and a Roman fibula (**00246s**).
- 4.76 Furthermore, the study area is crossed from south to north and east to west by two lines representing the projected courses of two Roman roads (**Plan EDP 2**). The road running from east to west runs from Bridgend to Cardiff, along the current route of the A48, and is well defined. The course of the other is more speculative.
- 4.77 There is no evidence that the site would be likely to contain Roman period remains of any great significance (such as settlement or funerary remains) as it is not situated adjacent to either road course or is it close to the known areas of settlement at Cowbridge. However, the site may have been within the agricultural hinterland of Roman settlement and thus there is considered to be a low potential for archaeological remains within the site, related to agricultural activity, such as infilled boundary ditches.
- 4.78 As such, in summary, the site has some potential to contain buried remains dating from the prehistoric and Roman periods, with potential for significant remains related to prehistoric burial. For later periods, it is likely that it was part of the agricultural hinterland of the town of Cowbridge, prior to its development for the school. As such, any later remains are likely to reflect agricultural usage and thus are unlikely to of much archaeological interest.
- 4.79 It should however be considered that the development of the school is likely to have destroyed any archaeological remains located within the footprint of its buildings. It is

also apparent (from historic maps) that the school grounds were subject to landscaping, resulting in the mixed areas of hardstanding and vegetation that are present today. It is likely that such works would have damaged or destroyed archaeological remains located within their footprint, especially any located at shallow depths.

- 4.80 As noted in **Section 1**, due to the HER evidence outlined above, GGAT have requested an archaeological evaluation of the open parts of the site. This work should serve to comprehensively identify the depth of disturbance caused by the landscaping within the school grounds, and thus conclude as to the potential for the survival of archaeological remains in these areas.
- 4.81 Given the site's allocation in the LDP, it is apparent that the site's capacity to accommodate the type of development proposed has already been established. Therefore, even if significant archaeological remains, such as prehistoric burials, are found to be located within the site, their significance would have to be weighed against the established benefit of developing the site.
- 4.82 As such, should significant archaeology be found within the site, it is considered that its loss would be best mitigated by recording, rather than it requiring preservation *in situ*, which might constrain the capacity of the site for development. Given this likelihood, it is not considered that evaluation trenching should need to be carried out prior to the determination of the application, and could take place in response to a condition of planning permission.

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Section 5

Heritage Impact Assessment

Introduction

- 5.1 In accordance with PPW (2018), this section identifies potential impacts from the proposed development on both designated and non-designated historic assets, that may be indirectly affected by the proposed development through changes to their setting.
- 5.2 In terms of indirect effects, this section addresses stages three of the four step approach to setting assessment described in Cadw's Settings Assessment guidance (Cadw, 2017).

Cowbridge Conservation Area

- 5.3 As described in **Section 4** above, the site, and the school buildings therein, is not considered to represent a part of the setting of the Cowbridge Conservation Area. The school buildings are not considered to relate to the special interest of the conservation area, and as such, their demolition would have no effect upon it.
- 5.4 Following development, it would be the case that, as for the existing school buildings, it would not be possible to experience the proposed new buildings in conjunction with the conservation area and its built heritage, nor would views of the buildings be possible from the conservation area. As such, the development would not be considered to be within the setting of the conservation area and would result in no effect on its special interest.

School Buildings

- 5.5 The proposed development would result in the demolition of all of the extant school buildings currently within the site. This would result in the loss of the 1896/1908 school building which represents a historic asset of low significance that is not Locally Listed.
- 5.6 The boundary wall on the building's south-east side would be retained, with its damaged piers and railings repaired or replaced. This boundary wall is considered to represent an historic asset, and as such the evidential value of the boundary would be retained and enhanced through its restoration. The boundary is closely associated with the school buildings; however, it is a functional structure, and following development it would continue to fulfil a boundary function and would continue to be a feature of the roadside.

Unrecorded Archaeological Remains

- 5.7 On the basis of current information, it is not known whether the site contains any unrecorded archaeological remains. The proposed new buildings would occupy the same, or a very similar footprint to the existing school buildings, and as such, groundwork

associated with them would be likely to impact upon ground already disturbed, in which no remains are likely to be preserved.

- 5.8 Other groundwork would consist of the clearance of the existing ground surface and replacement with new areas of hardstanding and other landscaping features. It is possible that these works would result in damage or destruction of archaeological remains within their footprint. However, remains located at depth, below the extent of these works, would be highly unlikely to be affected.

Summary

- 5.9 This assessment concludes that the implementation of the proposed development would result in no change to the setting of the Cowbridge Conservation Area, and thus no effect on its special interest.
- 5.10 The assessment identifies the following effects on non-designated historic assets:
- The total loss of the 1986/1908 former school building representing the loss of an historic asset of low significance that is not Locally Listed;
 - The retention and repair of the boundary wall and railings of the former school, which would continue to represent a feature of the roadside; and
 - Possible impacts on currently unrecorded archaeological remains located within the footprint of proposed surfacing and landscaping within the parts of the site outwith the footprint of the proposed new buildings.

Section 6

Conclusions

- 6.1 This Archaeological and Heritage Assessment concludes that the application site does not contain any World Heritage Sites, scheduled monuments, historic parks and gardens or listed buildings.
- 6.2 No designated heritage assets within the vicinity of the site have been identified as being at risk of having their significance harmed by the demolition of the existing buildings within the site or its subsequent development, either in terms of an effect on their physical form/fabric or through change to the contribution made by their setting. This includes the Cowbridge Conservation Area, the setting of which would be unaffected by the proposed development.
- 6.3 There are no previously recorded non-designated historic assets identified within the boundary of the site by the GGAT HER or the NMRW.
- 6.4 The site contains buildings of the former Cowbridge Comprehensive School. The proposed development will result in the total loss of these buildings. The main school building dates from 1896 and 1908, and, on account of its architectural, aesthetic and historical values, is considered to represent a non-designated historic asset of low significance. The building was assessed by Cadw as of insufficient architectural and historic interest to be worthy of statutory protection as a listed building.
- 6.5 It should be noted that as of September 2019 the building is not considered to represent a Locally Listed building (County Treasure) and thus is not subject to local planning policy that governs development effects on assets of this type.
- 6.6 The site also contains a boundary wall and railings associated with the former school. These are considered to represent a non-designated historic asset of low significance closely related to the school. The proposed development will retain and repair this boundary feature, which will continue to represent a feature of the roadside.
- 6.7 Evidence on the HER suggests that there is a moderate potential for archaeology related to prehistoric funerary activity within the site, and a low potential for Roman period archaeology related to agricultural activity. There is also a low potential for medieval or later archaeology of very low significance being present within the site. However, it is considered that any archaeological remains located within the footprint of the former school buildings are likely to have been damaged or destroyed. Likewise, historic landscaping within the school grounds is also likely to have resulted in damage or destruction of archaeological remains located within the site more generally.
- 6.8 Impacts from the proposed development on unrecorded archaeological remains within the site would be restricted to effects derived from re-surfacing and other landscaping activity, which would be likely to only affect remains located at shallow depths. The proposed buildings would be located within, or in close proximity to the footprint of the

existing school buildings, and thus would be within areas of the site in which archaeological remains are unlikely to be preserved.

- 6.9 Consultation with the Archaeological Planning Officer at GGAT resulted in a request for the site's archaeological potential to be investigated through a programme of archaeological trial trenching. These works should serve to comprehensively identify the depth of disturbance caused by the landscaping within the school grounds, and thus conclude as to the potential for the survival of archaeological remains in these areas.
- 6.10 It is considered that, given the site's allocation in the LDP, archaeological remains should not represent a determinative matter, and the required trial trenching should not need to precede the determination of the planning application. If significant archaeological remains are found within the site, it is considered that their loss could be mitigated through a programme of archaeological recording, to a scope agreed with GGAT, and in keeping with the guidance outlined in TAN 24.
- 6.11 The loss of the school building would result in the loss of a non-designated historic asset of low significance. Under PPW Edition 10 Paragraph 6.1.25 the relative importance of the asset should be weighed against other factors, including the need for the proposed development. With reference to the LDP, the loss of the building would be in conflict with the statement in Policy SP10 that the architectural and historic quality of any building must be preserved. As outlined previously, in **Section 3**, this broad statement is considered unrealistic, as it could be applied to most buildings in the Vale of Glamorgan, regardless of their planning status, where planning permission is being sought. Given this understanding, it is suggested that the weight given to Policy SP10 be reviewed with regards to this matter.
- 6.12 It should also be considered that, in the LDP, the site is allocated for residential development under Policy MG2 (18), and that whilst the allocation suggests that the building '*lends itself to conversion*' it does not state explicitly that the school building should, or must, be preserved. In this respect the potential loss of the building and the development of the site for housing is already established in principal.
- 6.13 GGAT and the Conservation Officer have requested that, if the school building is to be demolished, the demolition should be preceded by a programme of historic building recording, requested though a condition attached to planning permission. This recommendation reflects the building's significance as a low value historic asset, in accordance with the findings of the current assessment, and would be the correct treatment of such remains as per Paragraph 6.1.27 of PPW 2018.

Section 7

Bibliography

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Cadw, 2017 *Setting of Historic Assets in Wales*

Cadw, 2017 *Heritage Impact Assessment in Wales*

Cadw, 2011 *Conservation Principles, Policies and Guidance for the Sustainable management of the Historic Environment in Wales*

English Heritage, 2010. *England's Schools: History, architecture and adaptation*

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Welsh Government 2018, *Planning Policy Wales Edition Ten* Cardiff

Welsh Government 2017, *Technical Advice Note 24 (TAN 24) The Historic Environment*

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Images



Image EDP 1: Boundary Walls at Cowbridge Girls' Intermediate School (Glamorgan Archives, D833/29).



Image EDP 2: Photo of exterior of the school building (1930) (Glamorgan Archives, D1254/3/4).

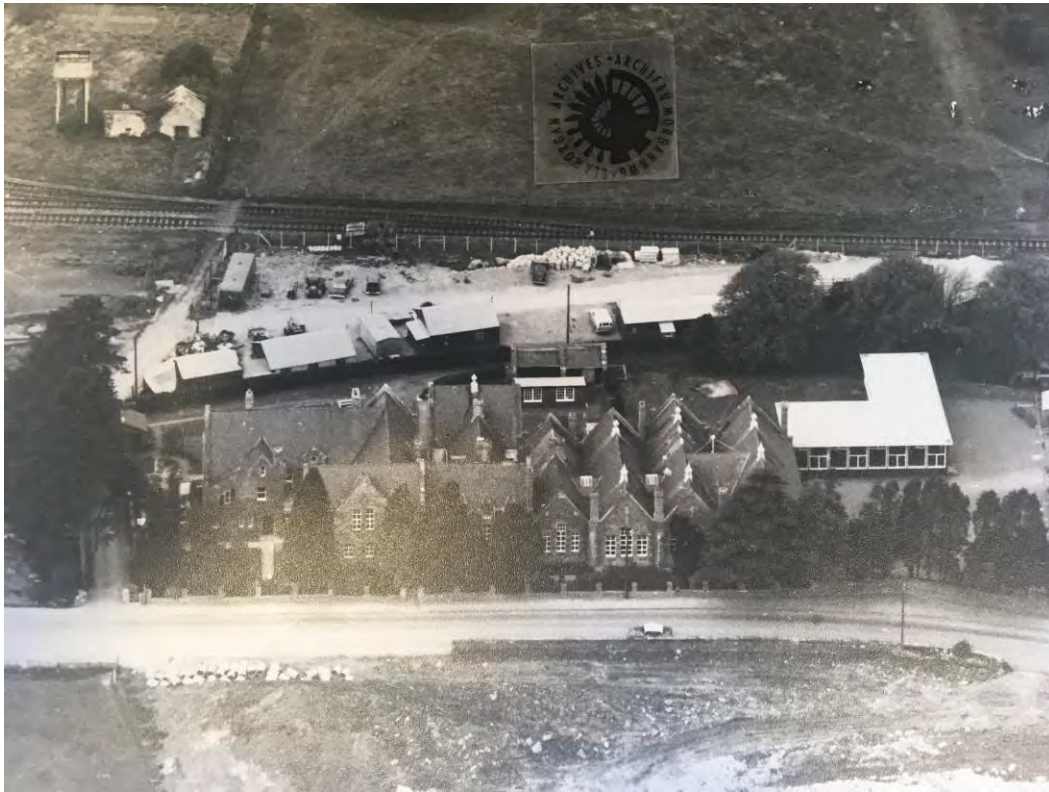


Image EDP 3: Aerial photograph of the school, 1964 (Glamorgan Archives, D854/26/3).



Image EDP 4: Photograph of the front exterior of the school, 1980 (Glamorgan Archives, D707/4/3).



Image EDP 5: Photograph of the front entrance of the school, 1980 (Glamorgan Archives, D707/4/3).



Image EDP 6: Photograph of the staircase, interior of the school, 1980 (Glamorgan Archives, D707/4/3).



Image EDP 7: South-east facing elevations of the south-west end of the school building.



Image EDP 8: South-east facing elevations of the north-east end of the school building.



Image EDP 9: Facing gable on the south-east elevation.



Image EDP 10: North-west facing elevation of the 1896 part of the building.



Image EDP 11: South-west facing elevation of the school building.



Image EDP 12: Arched window at the north-east end of the building.



Image EDP 13: Image illustrating invasive effect of vegetation.



Image EDP 14: Image showing the two remaining 1950s buildings and the stone wall remnant of the older outbuilding.



Image EDP 15: The southern extent of the boundary wall.

Appendix EDP 1
Site Layout Plan (Pentan, 3703 / PA / 210)

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Boundary Key

	TYPE 01 - 1100mm high black powder coated steel railings
	TYPE 02 - 1800mm high timber close boarded fencing
	TYPE 03 - Proposed retaining wall in strict accordance with Structural Engineer's specification
	TYPE 04 - 1800mm high black powder coated steel railings
	TYPE 05 - 450mm high facing brick wall
	TYPE 06 - 1100mm high black powder coated steel railings above existing stone boundary wall and between existing / new stone piers

Landscape Key

	A Grass / turfed areas
	B Permeable concrete block pavours
	C Fine grade tarmac
	450 x 450mm pre-cast concrete paving slabs
	Existing trees to be retained. Dashed line indicates root protection zone
	Existing trees to be removed
	New tree positions in accordance with Landscape Architect's design & specification
	New low level vegetation in accordance with Landscape Architect's design & specification
	2.6m x 4.8m parking space

General Key

	Plot number
	Timber garden shed (suitable for bike storage)
	3-arm rotary clothes line
	Site Boundary - Condition of fence to be assessed and replaced with 1800mm high close boarded timber fence if needed.

NOTES

Site plan developed using detailed survey prepared by ALT Surveys ref: '156073A / 156074A' dated: 5th November 2018.

Plans are subject to imposed planning conditions and thorough drainage investigations. Position of all existing in use and redundant drainage runs to be confirmed following further investigation.

Position of any existing underground services to be confirmed following further investigation.

Refer to engineer's proposals for details of upgrading works to existing highways, proposed highways within new development and for proposed site levels and drainage details.

Refer to landscape architect's proposal for details of soft landscaping.

Ownership of all boundaries to be confirmed by client.

SCHEDULE OF ACCOMMODATION

4no. wheelchair accessible apartments
4no. 2B3P apartments
2no. 2B4P apartments
23no. 1B3P apartments
Total = 30 apartments
4no. houses (1 x 4B6P, 1 x 2B4P and 2 x 3B5P)
Total = 34 units

pentan
architects

Project
Aberthin Road, Cowbridge

Client
Hafod Housing

Drawing Title
Proposed Site Layout

Date
Aug '19

Scale
1 : 200 @ A1

Drawing No.
3703 / PA / 210

Rev.
A

22 Cathedral Road
Cardiff CF11 9LJ

t: 029 2030 9010
info@pentan.co.uk

NOTES Do not scale. All dimensions are in millimetres unless stated otherwise

Appendix EDP 2

Email Correspondence with Rob Dunning (GGAT)

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From: Rob Dunning <Rob@ggat.org.uk>
Sent: 02 July 2018 08:20
To: Rob Skinner
Subject: RE: The Cowbridge Comprehensive School Sixth Form Site, Cowbridge

Dear Rob,

The results of the evaluation aside, then I would agree that a programme of building recording would be appropriate. The scope of recording would of course depend on the detailed plans of any application, but we would likely recommend a survey be attached as a condition.

Regards,

Rob

Rob Dunning BSc MCIfA
Archaeological Planning Officer
Glamorgan-Gwent Archaeological Trust Ltd
Heathfield House
Heathfield
Swansea
SA1 6EL

Tel 01792-655208
Fax 01792-474469

e-mail rob@ggat.org.uk
web www.ggat.org.uk

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From: Rob Skinner <robs@edp-uk.co.uk>
Sent: 28 June 2018 12:32
To: Rob Dunning <Rob@ggat.org.uk>
Subject: FW: The Cowbridge Comprehensive School Sixth Form Site, Cowbridge

Dear Rob,

Following on from your email to Barrie below, the requirement for an evaluation is acknowledged.

Should a proposal seek to demolish the existing school buildings, would you also require a programme of building recoding to be carried out as mitigation?

Many thanks

Rob

Dear Barrie,

Many thanks for your email. In addition to the LDP response we also recently received a pre-planning enquiry for the site (Our ref. VOG1395).

In essence, the regional Historic Environment Record (HER) indicates that the proposal is located in an area of high archaeological potential.

It indicates that "A skeleton was found with a knife in the grounds of the girls high school, Cowbridge. The bronze knife (or dagger), which was damaged, is described as having a plain ogural blade with bevelled edges and angular butt. The latter retains the semi-lunar markings of the handle and two of its three rivet-holes, with one rivet. Wheeler describes it as being typical of the Beaker period."

Whilst the construction of the current school will likely have had an adverse effect on any archaeological material, certainly within their footprint, there remains the distinct possibility that similar remains to that noted above may be encountered during the course of any development.

As a result should a similar application to the one you have outlined be submitted, we would likely recommend an archaeological evaluation be conducted prior to any determination. The evaluation would consist of the excavation of trial trenching, with the scope dependent on the submitted plans. The results of the evaluation will provide more information regarding the archaeological resource of the development area and may result in further work, or the retention of areas as open space, thus preserving any remains in-situ. This is consistent with our response to the LDP (our ref. VOG1061).

Should you require anything further, please get in touch.

Regards,

Rob

Rob Dunning BSc MCIfA
Archaeological Planning Officer
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Heathfield House
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From: Barrie Davies <Barrie@asbriplanning.co.uk>
Sent: 25 June 2018 12:05
To: Rob Dunning <Rob@ggat.org.uk>
Cc: Dylan Green <Dylan@asbriplanning.co.uk>

Subject: The Cowbridge Comprehensive School Sixth Form Site, Cowbridge
Importance: High

Hi Rob

I trust you are well.

I am acting for a client that is interested in redeveloping the above site – please find attached the sales particulars. It is proposed to demolish the existing school buildings to redevelop for residential use.

In the adopted LDP, the site is allocated for residential use and in the site description, it states:

“The Victorian school building has some architectural merit and lends itself to conversion although the building is not currently listed. GGAT have advised that an archaeological evaluation will be required and that some parts of the site may need to be retained as open space in order to protect archaeological features.”

Can you please advise as to the nature of the archaeological significance of the site, what the ‘archaeological features’ comprise of, and what you would expect to be submitted with any subsequent planning application?

Thanks in advance.

Barrie

Barrie Davies – Director

Asbri Planning Ltd | T: 029 2073 2652 | M: 07825 597782 | W: <http://www.asbriplanning.co.uk>

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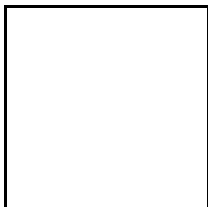


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Appendix EDP 3
Email confirming Cadw listing decision

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From: [Andrew Crutchley](mailto:Andrew.Crutchley)
To: [Rob Skinner](mailto:Rob.Skinner)
Subject: FW: 2019-02-04 - Former Cowbridge Intermediate School for Girls, Aberthin Road
Date: 04 February 2019 16:07:51

From: Rhodri.Kelly@gov.wales <Rhodri.Kelly@gov.wales>
Sent: 04 February 2019 16:07
To: Kate.Cutter@hafod.org.uk
Cc: steffanharries@lrmp.com; Andrew Crutchley <andrewc@edp-uk.co.uk>; alun.lock@pentan.co.uk; rhys.james@cushwake.com
Subject: 2019-02-04 - Former Cowbridge Intermediate School for Girls, Aberthin Road

Good afternoon Kate,

Further to previous emails, I can confirm that we have now completed our assessment of the building, and have concluded that it does not meet the high standard necessary for listing.

To qualify for listing, candidate buildings must be of nationally significant architectural or historic interest and must satisfy published listing criteria, which are intended to ensure that only the very best of our nation's historic buildings are protected. Where these are met, the Welsh Ministers (in practice Cadw) are under a duty to list but cannot do so otherwise. Buildings are included for the interest of their architectural design, decoration and craftsmanship, including particular building types and techniques. Similarly, buildings that illustrate important aspects of the nation's social, economic, cultural or military history are included for their historic interest. A building's age and rarity are also relevant. The older a building is, and the fewer surviving examples of its kind, the more likely it is to be of sufficient historical significance to be listed. For buildings built after about 1840, because of the greatly increased number of buildings that were built and have survived, much greater selection is needed to identify the best examples of particular building types and only buildings of definite quality and character can be listed.

The school would have been considered - and rejected for listing – in 1999 when Cadw undertook a community resurvey to identify historic buildings. In light of the recent information received, we have assessed the building again, including a full inspection of the property. It is a slightly deceptive building, being one building that was quickly and heavily extended. The first building was constructed in 1896 as a result of the intermediate Education Act but this was enlarged in 1908 to provide more facilities. The first building was a Z-shaped structure with a hall at the N end, headmasters office etc at the S end and classrooms in between. The 1908 extensions added 3 parallel ranges to the N, a further wing to the rear and an additional wing to the front. The se extensions were carried out with some sympathy for the original building, with a continuation of the same Gothic theme and (largely) the same stone and detailing used. There are slight differences between the two but overall the impact is convincing and it is not obvious that the building was constructed over 2 clear phases.

The building survived as a secondary school from the 1920s and was extended again (by a standalone structure) in the 1950s. During the 1960s a new comprehensive was built to the N, and on the other side of the Cowbridge bypass which was constructed at the same time. From that point it functioned as an outlying facility of the comprehensive, before falling out of use about 10 years ago, and is now in a semi derelict state.

Some original historic fabric does survive, particularly at the S office end which retains its stair, staggered stair windows with leaded glass and an oriel window overlooking the school yard to the rear; and here are a number of scissor type roof structures and some internal doors. However, through its continued use as a school, it has been updated with plastic windows largely replacing the originals. Much of the original interior, including the tiled fireplaces have been removed.

In terms of the criteria there is some difficulty in judging this as a good example of type. Whilst there could be an argument made for the quality and harmony of the 1908 extensions, the resultant overall quality and character is not as good as at other similar schools of its type and period, for example, the recently listed Ysgol Maesydre in Welshpool. Cowbridge by comparison is a school that lacks a distinctive plan form and appearance (there is no name or formal entrance for example) and it has been altered, in some parts heavily.

In support for listing, it has been suggested that Frances Hoggan (1843-1927) the first female doctor in Wales was educated at the school. However, this is not the case so this claim for historic association cannot be made.

Although the building has a clear local importance as a large historic building within the town, overall it has not survived as an especially good example of type, its character compromised by alteration. There are other better examples that have been listed (for example Maesydre; Harold Road, Abergavenny; Llanfyllin; and other schools in Pontypridd).

I am copying this to Steffan Harries of LRM Planning, Andrew Crutchley of EDP, Alun Lock of Pentan and Rhys James of Cushman and Wakefield for information.

Kind regards,
Rhodri Kelly

Rhodri Kelly

Gwasanaeth Amgylchedd Hanesyddol (Cadw) / Historic Environment Service (Cadw)

Llywodraeth Cymru / Welsh Government

Ffôn / Tel: 03000 256003

E-bost: Rhodri.kelly@llyw.cymru / E-mail: Rhodri.kelly@gov.wales

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Help our environment - only print this if really necessary.

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Appendix EDP 4
Consultation with the Conservation Officer - Advice issued to Vale
of Glamorgan Council 7 February 2019

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MEMORANDUM / COFNOD

The Vale of Glamorgan Council
Development Services
Dock Office, Barry Docks, Barry, CF63 4RT



To / I:	Yvonne Prichard	From / Oddi Wrth:	Conservation and Design
Dept / Adran:	Development Management	My Ref / Fy Cyf:	
Date / Dyddiad:	7 February 2019	Tel / Ffôn:	(01446) 704628
Your Ref / Eich Cyf:		Fax / Ffacs:	(01446) 421392

Application: 2018/01417/FUL
Location: Former Cowbridge Comprehensive School, Aberthin Road, Cowbridge
Proposal: Proposed demolition of existing school, development of 48 dwellings (43 flats and five houses) and associated works

Recommendation

- | | |
|--|--|
| <input type="checkbox"/> No objection | <input type="checkbox"/> Notes for applicant |
| <input type="checkbox"/> Object (holding objection) | <input type="checkbox"/> Request for further information |
| <input checked="" type="checkbox"/> Object and recommend refusal | <input type="checkbox"/> Recommend planning conditions |

Main Issue

The main issue considered by me is the impact of the proposed work on historic assets and their settings.

Site and Context

The site measures approximately 0.53 ha and is currently occupied by the former sixth form block of Cowbridge Comprehensive School, which is currently vacant. The site fronts onto the A4222 Aberthin Road and is close to the elevated section of the Cowbridge bypass. There is existing residential on the boundary to the south and west.

The site is located within the settlement boundary for Cowbridge as defined in the Local Development Plan (LDP).

Legislation and Policy

The Planning (Listed Buildings and Conservation Areas) Act (1990)

The Planning (Listed Buildings and Conservation Areas) Act 1990 (“the Act”) sets out the principal statutory instruments which must be considered in the determination of any application affecting either listed buildings or conservation areas.

Section 3A of the Act allows the local planning authority to serve a notice on the owner and occupier of any building which is of special architectural or historic interest; and is in danger of demolition or of alteration in such a way as to affect its character as a building of such interest.

The effects of serving a building preservation notice “BPN” are that the provisions of the Act (other than sections 47 to 51 and 59) and the Planning (Listed Buildings and Conservation Areas) Act 1990 have effect in relation to the building as if it were a listed building.

Section 16 of the Act states that in considering whether to grant listed building consent for any works the local planning authority 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.

Section 66 of the Act states that 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.

Section 69 enables Local Planning Authorities to designate conservation areas. Conservation areas are those areas of special architectural or historic interest the character or appearance of which it is desirable to preserve or enhance. Section 72 requires that in the exercise of planning duties special attention shall be paid to the desirability of preserving or enhancing the character or appearance of conservation areas.

The Courts have made it clear that the duty imposed in the Act means that in considering whether to grant permission for development that may cause harm to a designated asset and/or its setting, the decision maker should give particular weight to the desirability of avoiding that harm. There is still a requirement for a planning balance, but it must be informed by the need to give weight to the desirability of preserving the asset and its setting.

Planning Policy Wales

Planning Policy Wales (PPW) sets out, *inter alia*, the Welsh Government’s planning guidance on the conservation and enhancement of the historic environment.

Para 6.1.9 makes clear 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.”

Para 6.1.10 states:

“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 statutory requirement to have special regard to the desirability of preserving the building, its setting or any features of special architectural or historic interest which it possesses.”

Para 6.1.14 states:

“There should be a general presumption in favour of the preservation or enhancement of the character or appearance of conservation areas or their settings.”

Whilst Para 6.1.15 clarifies:

“There is a strong presumption against the granting of planning permission for developments, including advertisements, which damage the character or appearance of a conservation area or its setting to an unacceptable level. In exceptional cases, the presumption may be overridden in favour of development considered desirable on public interest grounds.”

Para 6.1.29 confirms that ‘Historic assets of special local importance’ do not benefit from statutory protection, but can make an important contribution to local distinctiveness and have the potential to contribute to public knowledge.

Technical Advice Note 12: Design

TAN 12 seeks to promote sustainability through good design. Paragraph 2.2 states:

“The Welsh Government is strongly committed to achieving the delivery of good design in the built and natural environment which is fit for purpose and delivers environmental sustainability, economic development and social inclusion, at every scale throughout Wales – from householder extensions to new mixed use communities.”

Technical Advice Note 24: The Historic Environment

TAN 24 confirms that

“Historic assets that the local planning authority may consider to be of special local interest are not accompanied by any additional consent requirements over and above those required for planning permission. However, if such assets are to

contribute successfully to the conservation or enhancement of local character their status needs to be clear in the development management process. If a local planning authority chooses to identify historic assets of special local interest, it must include policies for their preservation and enhancement in the local development plan.”

Local Development Plan

The Vale of Glamorgan LDP policies reflect the national policy for the strict control of development affecting conservation areas. Policy SP10 (Built and Natural Environment) and Policy MD8 (Historic Environment) set out the preserve or enhance the character or appearance of the Vale of Glamorgan’s Conservation Areas.

POLICY SP 10 - BUILT AND NATURAL ENVIRONMENT
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 INDIVIDUAL BUILDINGS OR CONSERVATION AREAS, INCLUDING LOCALLY LISTED BUILDINGS;
2. HISTORIC LANDSCAPES, PARKS AND GARDENS;
3. SPECIAL LANDSCAPE AREAS;
4. THE GLAMORGAN HERITAGE COAST;
5. SITES DESIGNATED FOR THEIR LOCAL, NATIONAL AND EUROPEAN NATURE CONSERVATION IMPORTANCE; AND
6. IMPORTANT ARCHAEOLOGICAL AND GEOLOGICAL FEATURES.

Policy MD8 (Historic Environment) deals specifically with the protection of the qualities of the built historic environment, and in particular the preservation and enhancement of conservation areas character or appearance:

POLICY MD 8 - HISTORIC ENVIRONMENT
DEVELOPMENT PROPOSALS MUST PROTECT THE QUALITIES OF THE BUILT AND HISTORIC ENVIRONMENT OF THE VALE OF GLAMORGAN, SPECIFICALLY:

1. WITHIN CONSERVATION AREAS, DEVELOPMENT PROPOSALS MUST PRESERVE OR ENHANCE THE CHARACTER OR APPEARANCE OF THE AREA;
2. FOR LISTED AND LOCALLY LISTED BUILDINGS, DEVELOPMENT PROPOSALS MUST PRESERVE OR ENHANCE THE BUILDING, ITS SETTING AND ANY FEATURES OF SIGNIFICANCE IT POSSESSES;
3. WITHIN DESIGNATED LANDSCAPES, HISTORIC PARKS AND GARDENS, AND BATTLEFIELDS, DEVELOPMENT PROPOSALS MUST RESPECT THE SPECIAL HISTORIC CHARACTER AND QUALITY OF THESE AREAS, THEIR SETTINGS OR HISTORIC VIEWS OR VISTAS;

- | |
|--|
| 4. FOR SITES OF ARCHAEOLOGICAL INTEREST, DEVELOPMENT PROPOSALS MUST PRESERVE OR ENHANCE ARCHAEOLOGICAL REMAINS AND WHERE APPROPRIATE THEIR SETTINGS. |
|--|

Supplementary Planning Guidance

Conservation Area Appraisal and Management Plans

The Cowbridge with Llanblethian Conservation Area Appraisal and Management Plan identifies the qualities of the conservation area. Whilst the conservation area is an area of special architectural and/or historic interest, the character or appearance of which it is desirable to preserve or enhance, this does not mean that it is automatically of high sensitivity to all forms or scales of development or that parts of it are uniformly of the same value and sensitivity.

The CAAMP is not prescriptive about which areas may be suitable for development but is guidance on general principles. It provides more detail than the Unitary Development Plan and is the preferred guidance for assessing the impact of the proposed scheme.

Other Guidance

Conservation Principles (Cadw, 2011)

Assessing the Setting of Historic Assets in Wales (Cadw, 2017)

Identification of heritage assets affected and their settings

Archaeology and Scheduled Monuments

The local planning authority must consult the Welsh Government's Historic Environment Service (Cadw) on all planning applications which in their opinion are within the setting of a scheduled monument and meet certain criteria. Applications will need to include sufficient information to assess the impact of the proposal on the historic asset and its setting, but this should be proportionate to the likely impact of the proposal.

The application site is approximately 0.51ha, therefore, Cadw will need to be consulted if the proposed development would be visible from any scheduled monuments within 2km of the site. I note there are 8 scheduled monuments within 2km, these are:

- St Quintin's Castle
- South Gate
- Llanquian Wood Camp
- Llanquian Castle
- Stalling Down Round Barrow
- Llandough Castle (Remains of Hall)
- Caer Dynnaf

There will be no direct impacts on any scheduled monuments. I note the Glamorgan-Gwent Archaeological Trust have made a representation on this application.

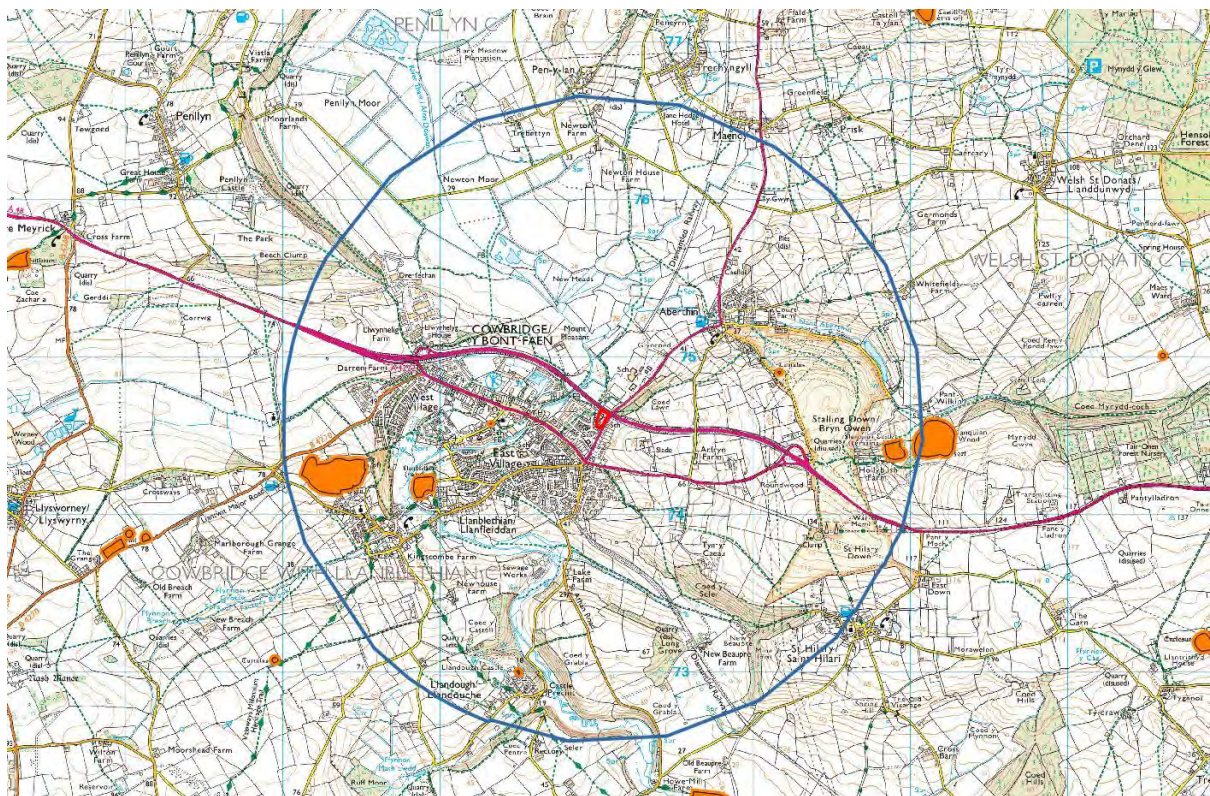


Figure 1: Scheduled monuments within 2km of the application site.

Listed Buildings

The closest listed buildings are located approximately 200m to the south east of the application site. There are a substantial number of listed buildings in the Cowbridge Conservation Area with 17 of these located in the Eastgate area.

I understand a representation has been made to Cadw to have the building included in the statutory list. I further understand that a formal decision has been made to not include the building on the statutory list at this time. I see no reason to disagree and would not make a recommendation to serve a building preservation notice.

Therefore, there will be no direct impacts on any listed buildings resulting from the proposed development. Impacts on the setting of listed buildings are considered below.

Conservation Areas

The application site is approximately 140m north of the Cowbridge Conservation Area and 850m south east of the Aberthin Conservation Area. There will be no direct impacts on any conservation area resulting from the proposed development. Impacts on the setting of conservation areas are considered below.

Locally Listed County Treasures

The nearest locally listed County Treasure is 225m to the south east of the application site. There will be no direct impacts on any locally listed buildings resulting from the proposed development. Impacts on the setting of locally listed buildings are considered below.

Whilst it is noted that the building does not benefit from any statutory or local designation it clearly has some historic/architectural merit as identified in the LDP (MG2(19) p.197 refers).

This view is shared by the Archaeological and Heritage Assessment ("the AHA") submitted as part of the application and the Heritage Visual Impact Assessment ("the HVIA") submitted as a part of a representation objecting to the proposed development. Cadw, in their email to the applicant, have also confirmed that whilst falling short of national importance the building is locally significant.

Notwithstanding the request to include the building in the statutory list, it is appropriate to consider the building against the criteria for inclusion as a County Treasure contained in the County Treasures SPG.

The criteria for inclusion as a locally listed County Treasure can be found in the council's adopted Supplementary Planning Guidance. Whilst this document is scheduled for review, it is the current document that is adopted.

The criteria are repeated below for convenience.

1. Architectural interest – buildings which are of importance to the Vale of Glamorgan for the interest of their architectural design, decoration and craftsmanship; also important examples of particular building types and techniques;
2. Historic Interest – this includes buildings which illustrate important aspects of the Vale of Glamorgan's social, economic, cultural or military history;
3. Close Historical Association – with the Vale of Glamorgan's important people or events;
4. Group Value – especially where local buildings comprise an important architectural or historic unity;
5. Old or rare local buildings that have been altered too much to warrant being included on the national statutory list, but nonetheless retain character.

Whilst I am mindful of the AHA, the HVIA and Cadw's comments I have made my own assessment of the building and I am satisfied it meets criteria 1, 2, 3 & 5. My assessment is included at Appendix A to this memorandum.

Having identified the local significance of the building I shall make the recommendation that it is included on the County Treasures list. Should the building be included on the list then the provisions of Policies SP10 and MD8 should apply. These policies require the preservation or enhancement of locally listed buildings and their settings.

Regardless of whether the building is included in the local list it would be necessary to consider the development against Policy SP10 of the LDP

Assessment of significance and the contribution of settings

I have relied on Cadw's guidance document 'Setting of Historic Assets in Wales' to undertake this assessment.

Scheduled Monuments

As noted above, Cadw will need to be consulted if the proposed development would be visible from any scheduled monuments within 2km of the site.

Listed Buildings, Conservation Areas and Locally Listed Buildings

As identified above there are a number of listed and locally listed buildings, and conservation areas located near the application site. Some of these historic assets have some degree of intervisibility with the existing building.

Notwithstanding this there has been a substantial amount of development between the historic buildings on Eastgate and the application site. This includes the loss of

the railway station and railway lines that ran through what is now Millfield Drive which was built in the latter half of the last century. Immediately adjacent to the application site is an elevated section of the Cowbridge bypass.

This modern development has effectively diluted the significance of the setting of the listed buildings, locally listed building and Cowbridge Conservation Area to such an extent that it should be considered negligible.

In relation to historic assets located within the Aberthin Conservation Area (including the conservation area) the combination of topography, distance and the modern school development mean the setting of these historic assets will not be harmed by the proposed development.

Impact assessment of proposed development

The proposed development will result in the demolition of the existing building which has previously been identified as local significance and, more recently, as a potential 'County Treasure'.

I am satisfied that there will be no direct harm caused to any scheduled monument, listed building, conservation area or locally listed building.

I am satisfied that there will be no harm caused to the setting of any listed building, conservation area or locally listed building.

Given the building has been identified as having architectural or historic qualities, the development will need to be considered against Policy SP10. Should the building be included in the local list it would clearly result in the loss of a locally significant historic asset contrary to policy SP10 and MD8.

Conclusions

- The building is considered to be of local significance warranting its inclusion in the County Treasures list; and
- The proposal would result in the loss of a locally significant historic asset.

Recommendations

- The building be included in the County Treasures list; and
- The application be refused.

Notwithstanding my views above, if you are minded to approve the application I would recommend the inclusion of a condition requiring a level 3 building record to be created.

No development approved by this permission shall commence until an appropriate programme of historic building recording and analysis has been secured and implemented in accordance with a written scheme of investigation which shall first have been submitted to and approved in writing by the local planning authority. The final report on such recording shall be deposited with the Local Planning Authority prior to first beneficial use of the development

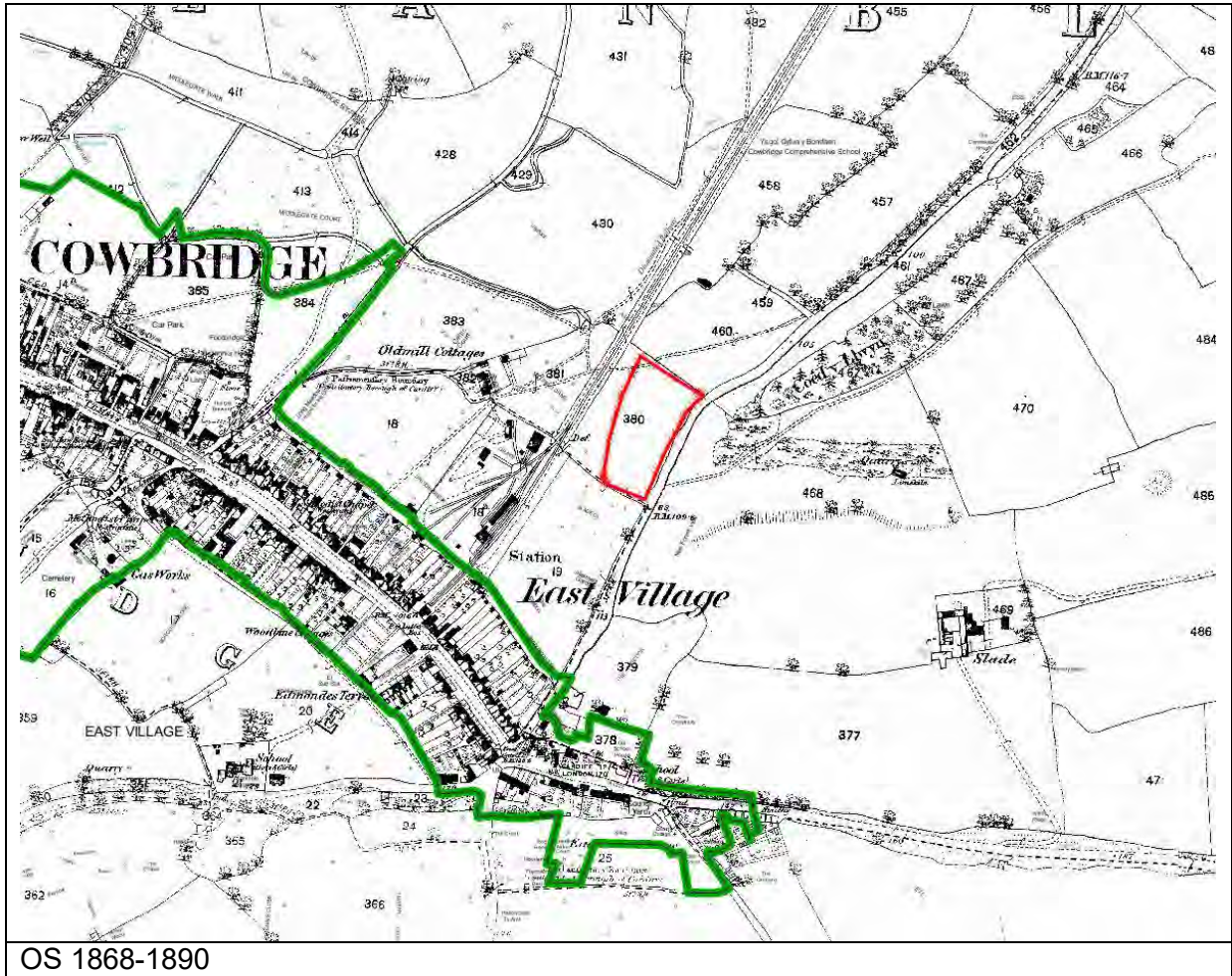
hereby approved, in order that it may be forwarded to the Historic Environment Record, operated by the Glamorgan Gwent Archaeological Trust (Heathfield House, Heathfield, Swansea SA1 6EL Tel: 01792 655208).

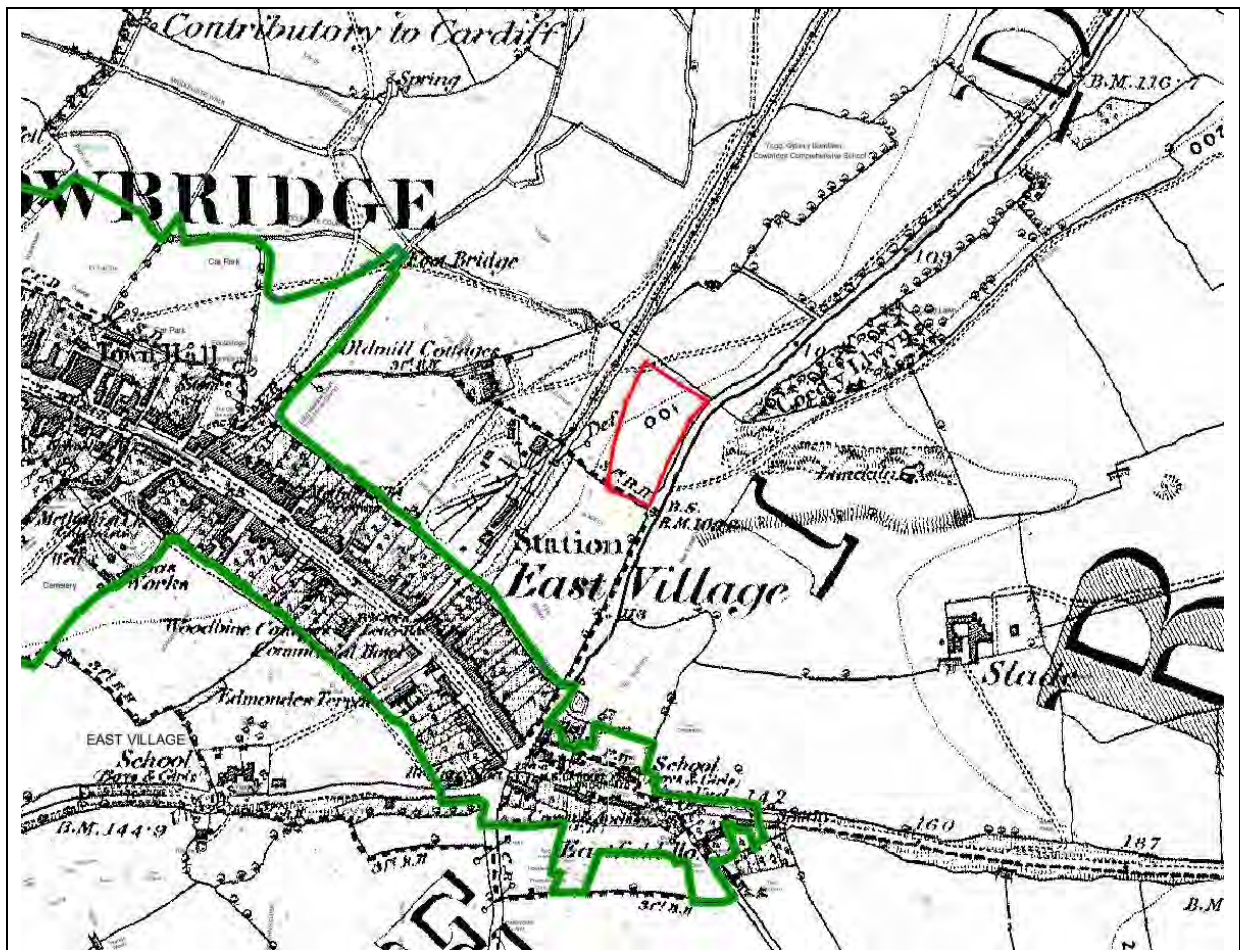
Reason:

As the building is of significance the specified records are necessary in order that records are kept of any features of archaeological interest and to ensure compliance with Policy MD8 of the Local Development Plan.

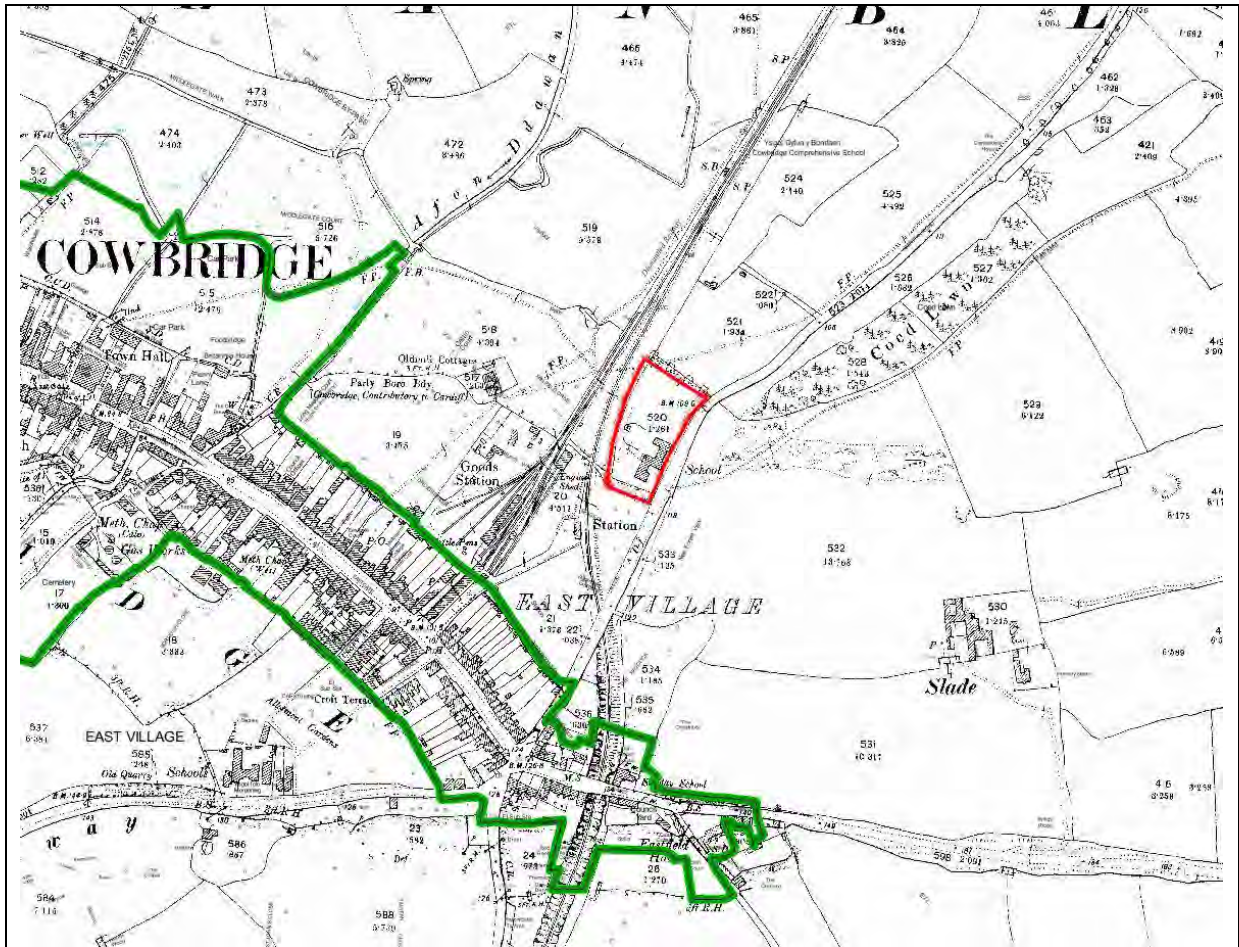
Peter Thomas
Senior Planner (Conservation and Design)

Appendix A – Historic Mapping

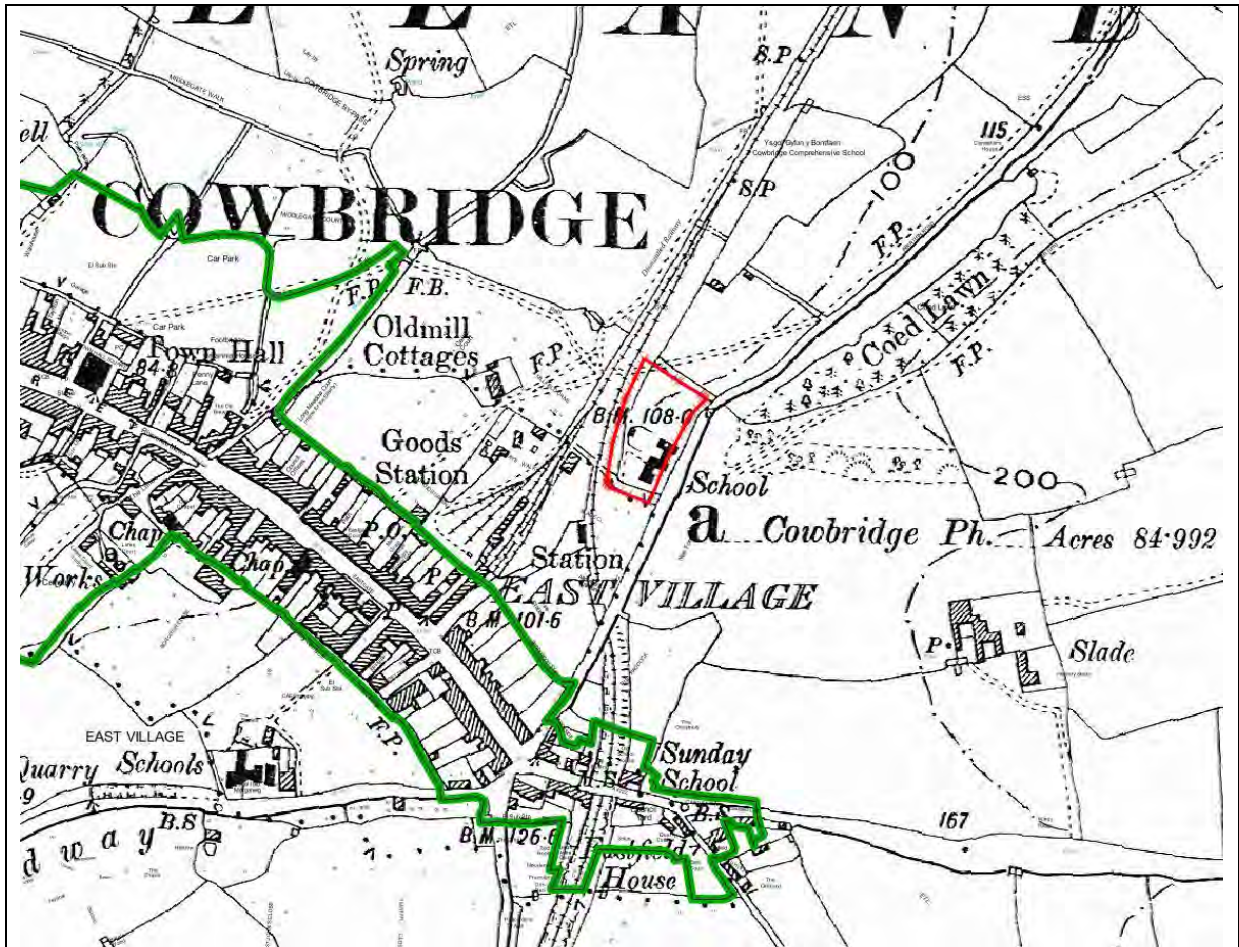




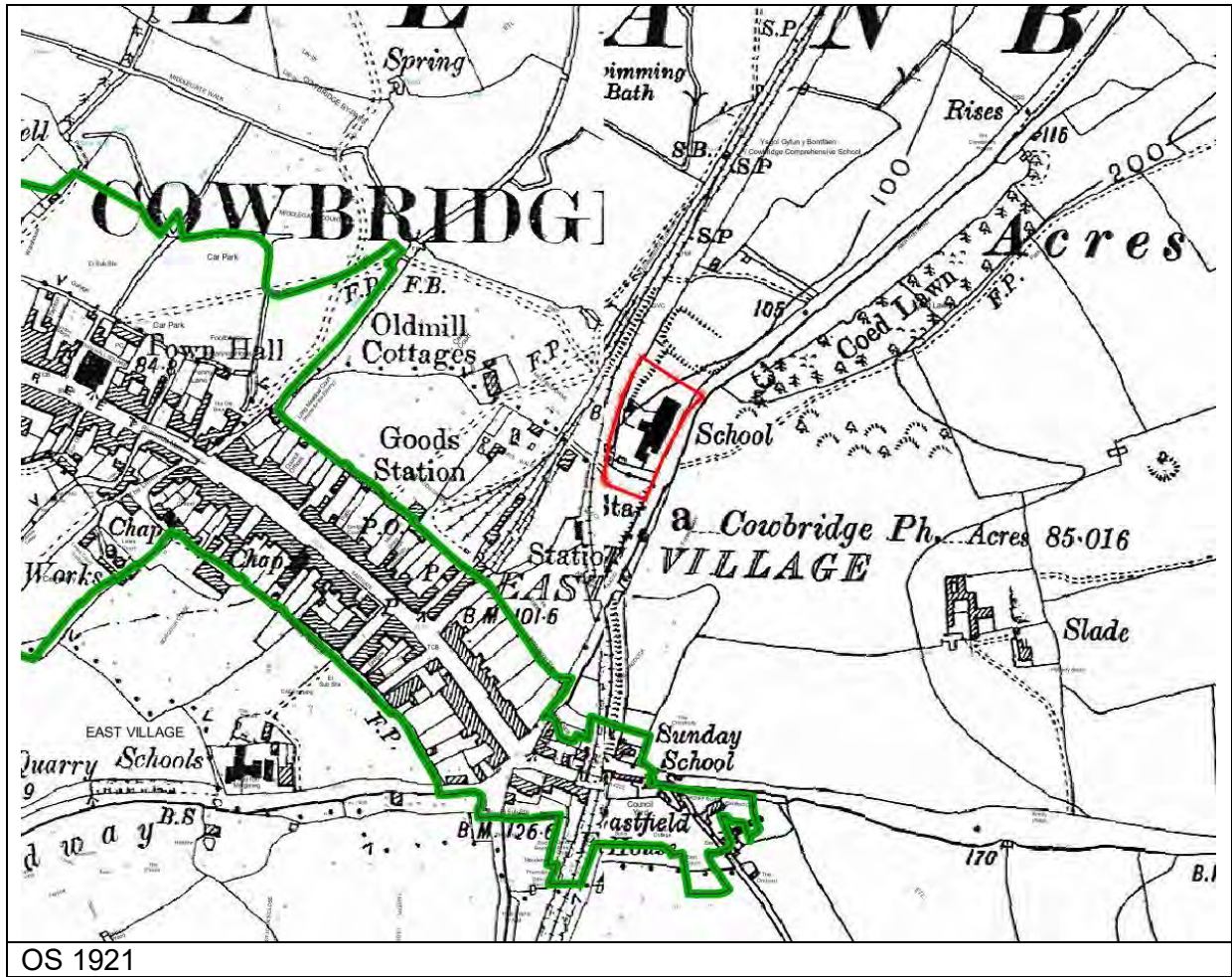
OS 1885

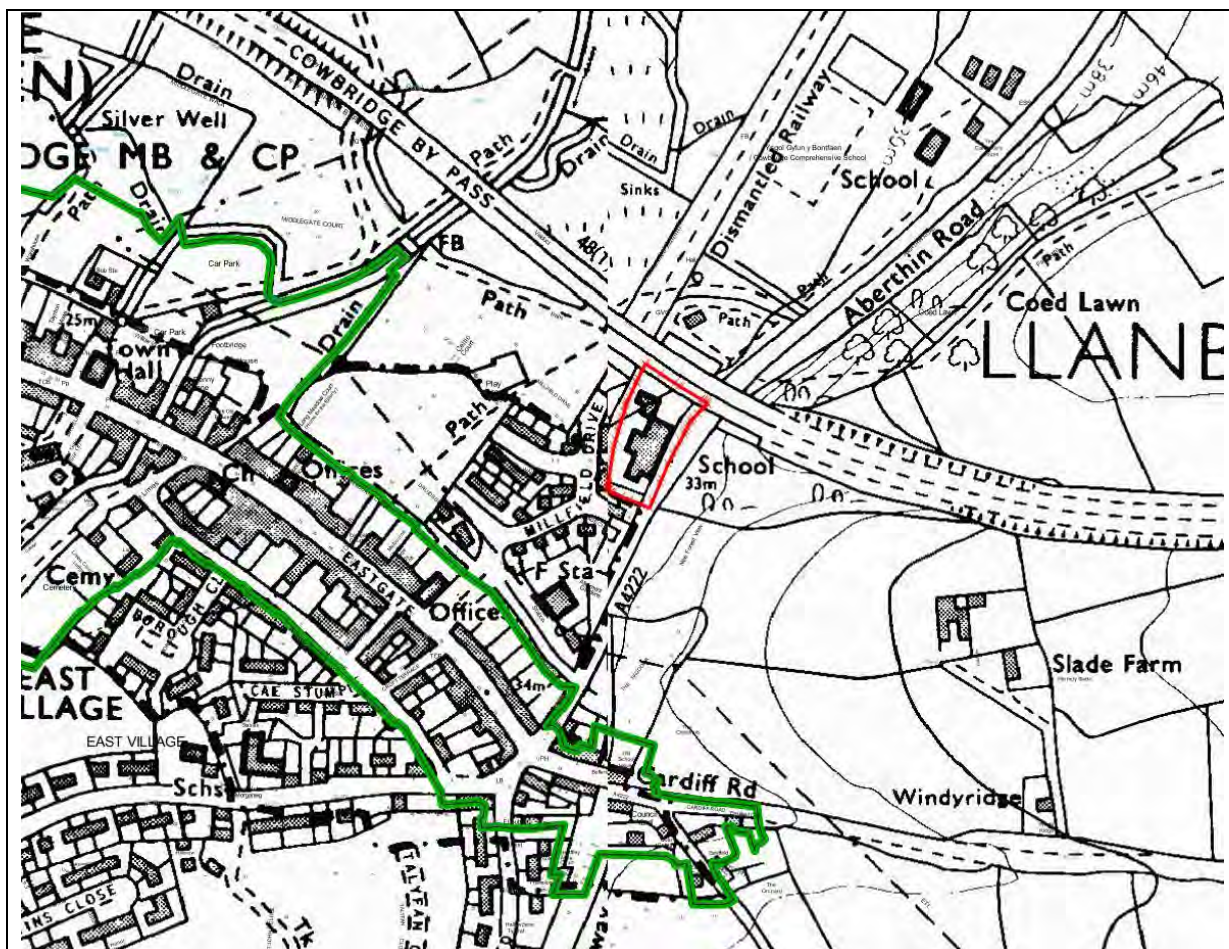


OS 1897 - 1907



OS 1900





OS 1972 1975

Plans

- Plan EDP 1** Designated Heritage Assets
(edp5120_d001a 02 October 2019 AG/RS)
- Plan EDP 2** HER and NMRW records
(edp5120_d002b 02 October 2019 AG/RS)
- Plan EDP 3** The School Buildings
(edp5120_d003a 02 October 2019 AG/RS)
- Plan EDP 4** Historic Maps
(edp5120_d004a 02 October 2019 AG/RS)
- Plan EDP 5** Historic Maps
(edp5120_d005a 02 October 2019 AG/RS)

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Site Boundary
 500m Study Area
 Conservation Areas

Listed Buildings

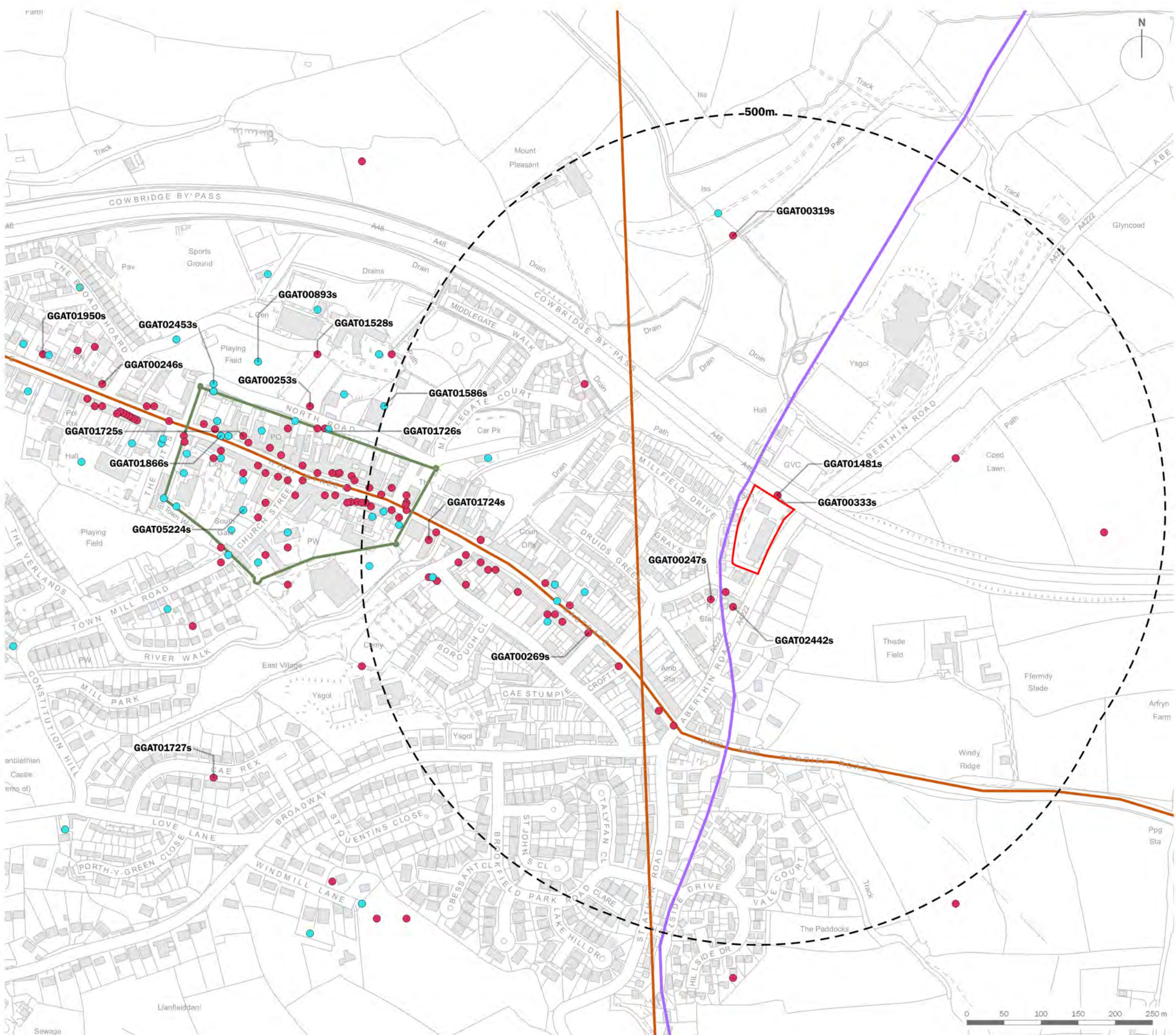
- ★ I
- ★ II*
- ★ II

Cowbridge Conservation Area

client	Hafod Housing Association	
project title	Aberthin Road, Cowbridge	
drawing title	Plan EDP 1: Designated Heritage Assets	
date	02 OCTOBER 2019	drawn by AG
drawing number	edp5120_d001a	checked RS
scale	1:5,000 @ A3	QA GY



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- Site Boundary
- 500m Study Area
- HER Core
- HER Event
- HER Tram and Rail Line
- Town Walls
- Roman Road

client
Hafod Housing Association

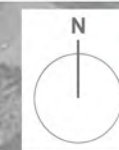
project title
Aberthin Road, Cowbridge

drawing title
Plan EDP 2: HER and NMRW Records

date	02 OCTOBER 2019	drawn by	AG
drawing number	edp5120_d002b	checked	RS
scale	1:5,000 @ A3	QA	GY



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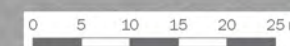
- Site Boundary
- 1896 Parts
- 1908 Parts
- 1956 Parts

client
Hafod Housing Association

project title
Aberthin Road, Cowbridge


drawing title
Plan 3: The School Buildings

date	02 OCTOBER 2019	drawn by	AG
drawing number	edp5120_d003a	checked	RS
scale	1:1,250 @ A3	QA	GY

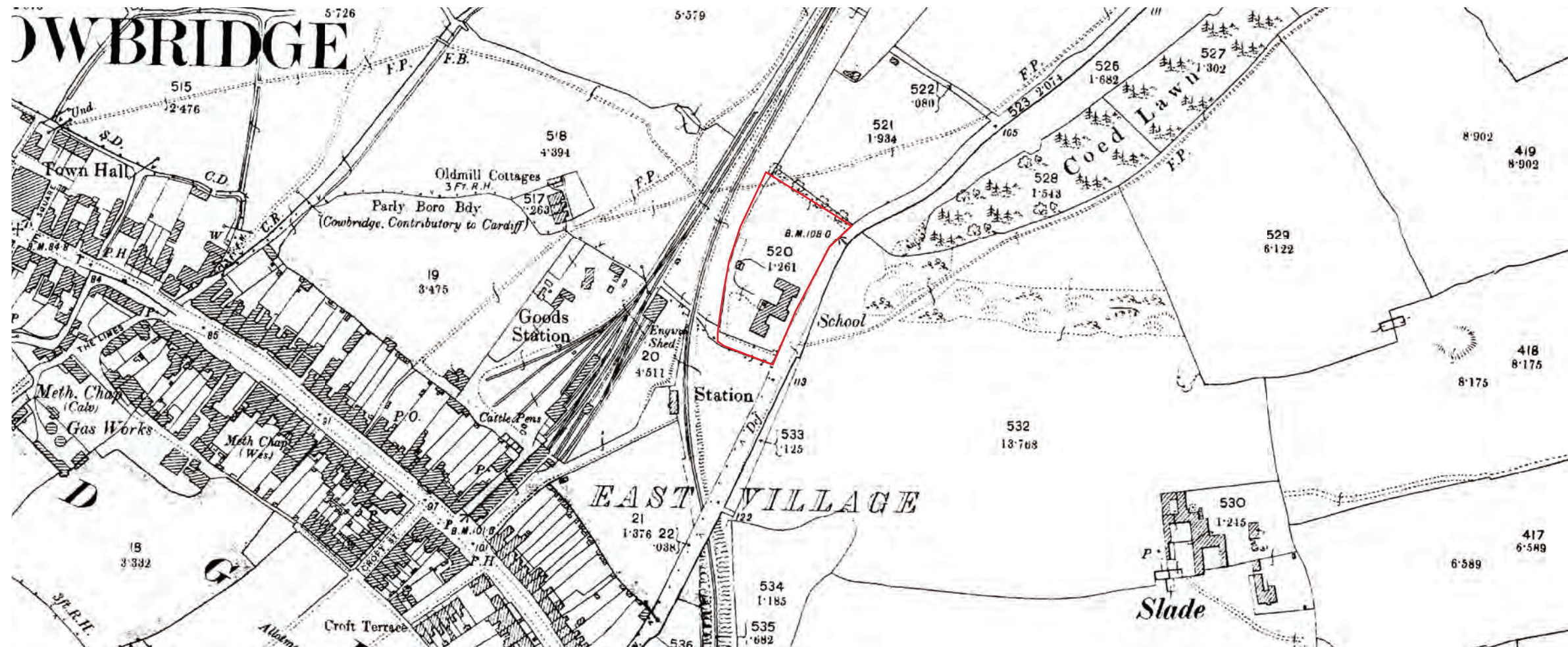


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 Approximate Site Boundary

A) 1840 Tithe Map of Llanblethian Parish



B) 1899 Second Edition Ordnance Survey Map

client
Hafod Housing Association

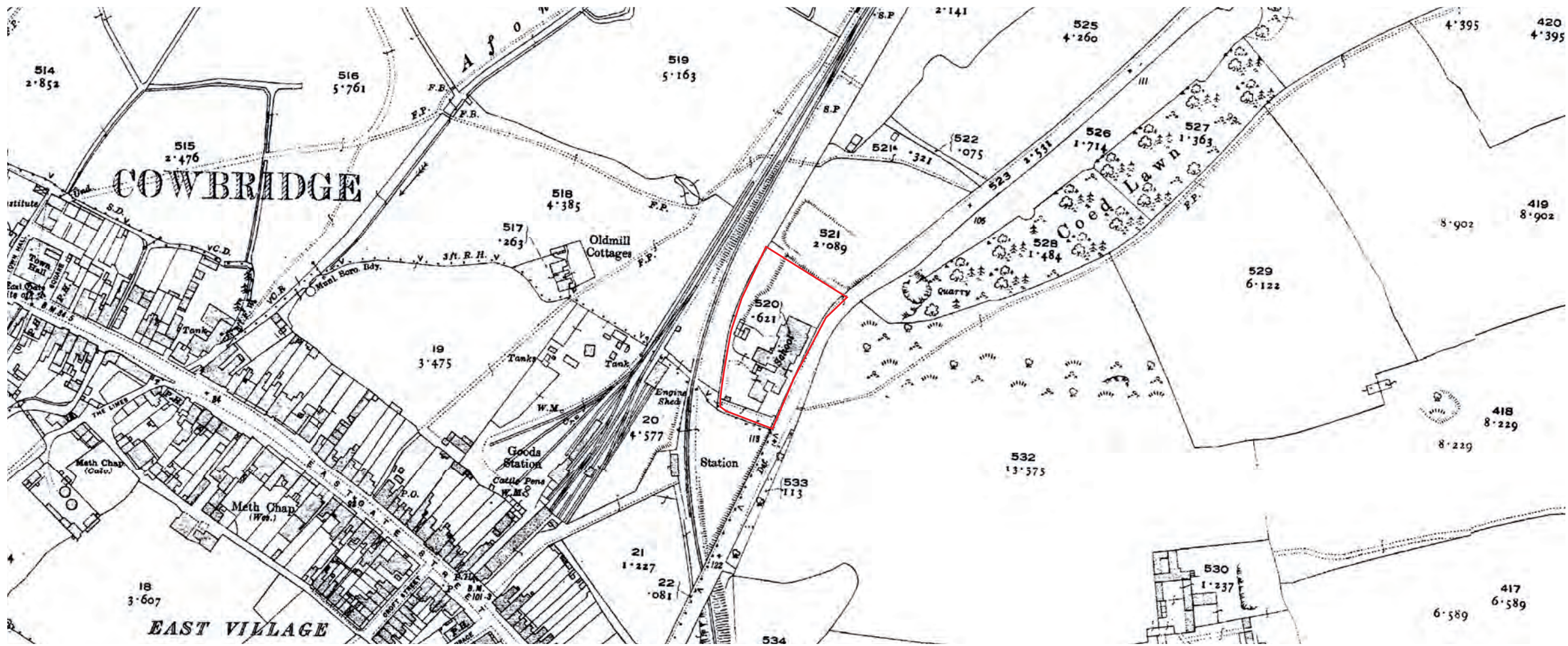
project title
Aberthin Road, Cowbridge

drawing title
Plan EDP 4: Historic Maps

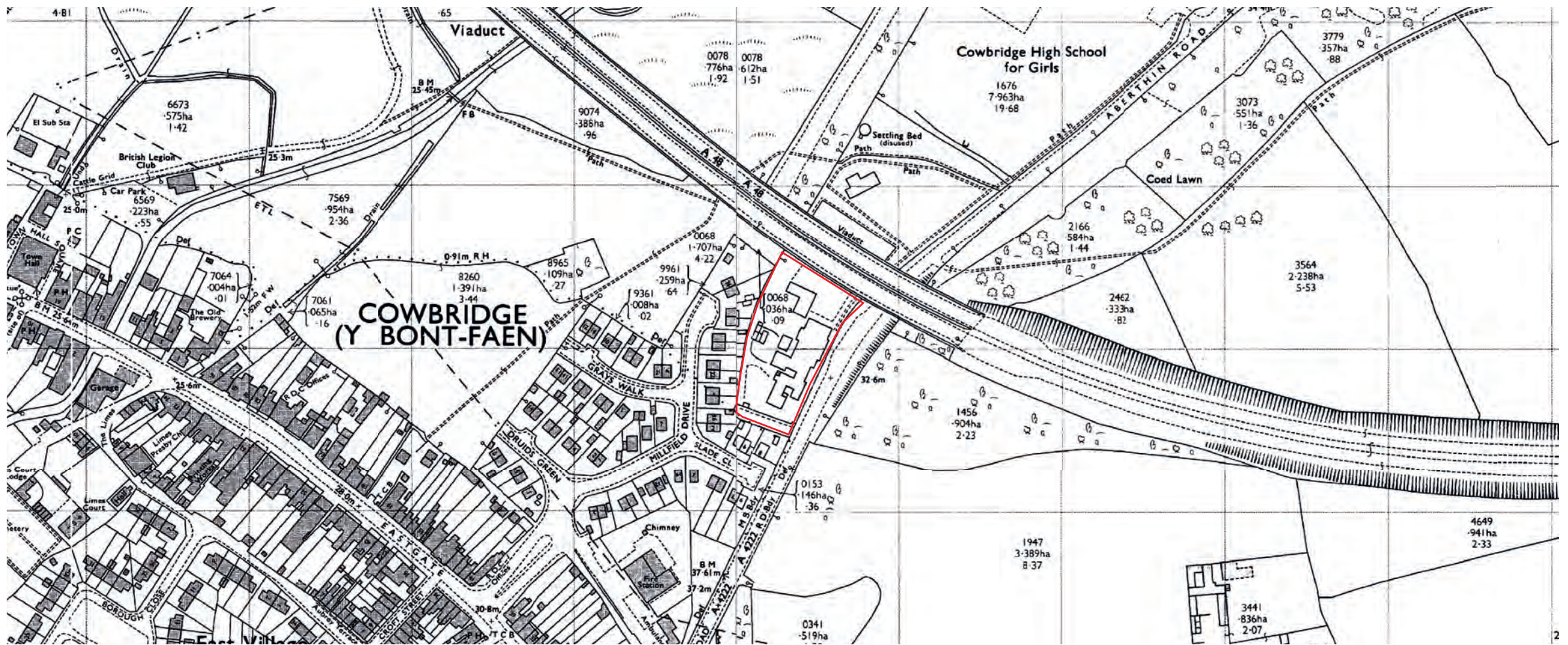
date	02 OCTOBER 2019	drawn by	AG
drawing number	edp5120_d004a	checked	RS
scale	Not to scale	QA	GY




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C) Third Edition Ordnance Survey Map of 1919



D) Ordnance Survey Map of 1971-72

 Approximate Site Boundary

client
Hafod Housing Association

project title
Aberthin Road, Cowbridge

drawing title
Plan EDP 5: Historic Maps

date	02 OCTOBER 2019	drawn by	AG
drawing number	edp5120_d005a	checked	RS
scale	Not to scale	QA	GY



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