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# THE VICTORIAN SOCIETY

The champion for Victorian and Edwardian architecture

Mr S. D. Butler  
Planning  
Vale of Glamorgan Council  
By email

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

developmentcontrol@valeofglamorgan.gov.uk

26 March 2020

Dear Mr Butler,

**RE: Former Cowbridge Comprehensive School, Aberthin Road, Cowbridge (unlisted, 1896 and 1908): proposed demolition of existing school, development of development of 34 dwellings (30 flats and four houses) and associated works including the construction of bespoke bat roost, access/parking and landscaping.**

The Victorian Society has been made aware of revisions to this application. We maintain our strong **objection** to the proposals and would like to offer our comments.

We wrote to object to a previous version of this application on the 8 March, 2019 — I am attaching our letter for reference as most parts are still pertinent. Since then, however, the situation has changed: in response to the proposals to demolish the school a request was made to CADW to spot-list the building; CADW rejected this request; a thorough 'Historical and Architectural Appraisal' of the school was then produced by an independent expert to inform another application to CADW to add the building to the list; CADW again rejected the application; currently there is a petition to urge the Welsh Government to reconsider CADW's decision. The applicants amended their application earlier this year, without, however, taking into account the new information about the significance of the school that has come to light. The proposals are still to demolish entirely the historic buildings.

The position of the Victorian Society in this unusual case is as follows. Firstly, we think that the decision made by CADW not to list the former Cowbridge Comprehensive School on the basis of the thorough Historical and Architectural Appraisal prepared by Robert Scourfield is difficult to defend. It seems to us that the former Cowbridge Comprehensive School clearly meets the criteria for listing as set out in Technical Advice Note 24, and that CADW's refusal to recommend the building for listing in spite of the clear new evidence presented in the Scourfield report represents a lapse of judgment. The reasons given by CADW for this refusal are weak, and are convincingly answered in Mr Scourfield's rebuttal (attached). We remain firmly of the opinion that the former Cowbridge Comprehensive School meets the criteria for listing and should be listed.

Secondly, leaving aside any question as to whether or not CADW have made an error in this case, we would like to emphasise that the Scourfield Appraisal indisputably contains a wealth of new information about the history and significance of the school. Considered as an assessment of the school's significance it is much more thoroughly researched than the Archaeological and Heritage Assessment provided with the application by the Environmental Dimension Partnership Ltd (EDP), and

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the analysis is correspondingly more acute. We recommend that your authority take it as the benchmark for your assessment of the application and the level of harm it will cause to the historic environment. The salient points are as follows:

- Cowbridge Intermediate School represents an important moment in the history of education in Wales; it was the first intermediate school for girls in the country, and its building is associated with a historically important controversy about the provision of education. It has clear historical value.
- The original building was designed by an undervalued but important local architect; it was sensitively extended by another important local figure. The building survives relatively intact, with some fine architectural features inside and out; its level of survival is at least equivalent to that of comparable, listed, examples. It has clear aesthetic and evidential value.
- The school is clearly highly valued locally, as the strength of opposition to the current proposals shows. Its clear communal value must be taken into consideration in your decision.

It is especially important to bear in mind the place of the former Cowbridge Comprehensive School in the specifically Welsh context, both historically and architecturally. As we pointed out in our earlier letter, the Archaeological and Heritage Assessment provided by the applicants did not adequately address this context; the revised version includes no pertinent amendments in this regard.

The Scourfield report demonstrates convincingly not only that the former School has a high degree of historic and architectural interest, but that it retains its historic plan form, fixtures and fittings to a good degree. The applicants have still provided no evidence that the existing buildings are structurally unsound, or that they are unsuited for sensitive conversion to residential accommodation. The repeated implication in the application documents is that 'development' of any kind necessarily requires the total demolition of the existing buildings. This is simply not the case. There may be an argument from viability, but the applicants have not made it; any argument from convenience must be discounted in the face of the demonstrable heritage significance of the surviving buildings.

The Victorian Society has no objection in principle to the redevelopment of the former Cowbridge Comprehensive School. The buildings are redundant; conversion and reuse would seem a good way both to provide much needed housing and to preserve an important element of the historic environment, and we would welcome an application that offered a sensitive compromise. The current application, however, proposes simply to destroy a historically important and architecturally valuable piece of Welsh heritage; it continues to show little understanding of the significance of what will be lost, and offers no justification for the severity of the proposals. We therefore once again urge your authority to refuse consent.

We would be grateful if you could inform us of your decision in due course and consult us again if the documents are updated.

Yours sincerely,

Tom Taylor

**Conservation Adviser**