

CONSULTEE RESPONSE

Mr. S. D. Butler
Vale of Glamorgan Council
Civic Offices
Barry CF63 4R

By email to: developmentcontrol@valeofglamorgan.gov.uk

Our reference: 20039
26th March 2020

Dear Mr Butler,

Application: 2018/01408/FUL - Former Cowbridge Comprehensive School, Aberthin Road, Cowbridge
Proposed demolition of existing school, development of 34 dwellings (30 flats and four houses) and associated works including the construction of bespoke bat roost, access/parking and landscaping.

SAVE Britain's Heritage strongly objects to the above application for the demolition of the historic former Cowbridge Girls' Intermediate School. Whilst we do not object to the principle of redeveloping this site or indeed its reuse for residential purposes, we strongly object to the complete demolition of these notable and historically significant former school buildings, which have survived largely intact for over 120 years. The proposals also fail to comply with national and local policy considerations for the protection of the Vale of Glamorgan's historic environment, and for these reasons we call on Vale of Glamorgan Council's Planning Authority to reject the application.

Significance

The former Cowbridge Girls' Intermediate School was built in 1896 and extended in 1908, becoming the first girls' intermediate school to be built anywhere in Wales under the Welsh Intermediate Education Act of 1889. Whilst the building is neither statutory listed nor situated in a Conservation Area, its historical and architectural significance are acknowledged in Cadw's 2019 spot listing assessment. While Cadw ultimately did not grant the building statutory listed status, it did note that it is of obvious local importance and warranted inclusion on the Vale of Glamorgan's County Treasures list as a Non-Designated Historic Asset (NDHA). This view is supported by the council's Conservation and Design Officer in their advice and recommendation that this application for the school's total demolition be refused.

Our Assessment

SAVE objects to the principle of demolishing this historic Non-Designated Heritage Asset for three reasons. Firstly, the applicant does not provide sufficient justification or evidence for why the building cannot be retained and converted as part of this residential scheme, but rather assumes demolition to be the only option. Paragraphs 3.2 and 3.3 of the applicant's Planning Statement claim that "*though conversion is possible*" it would be "*problematic*". No evidence is given to define why conversion is "*problematic*" beyond that fact the internal spaces of the school are of varied size, height and dimension. On the contrary, our experience over 40 years of campaigning has shown that, given an imaginative and sustainable design approach, conversion of historic buildings of this type to residential use

often works very well. SAVE's two reports on Historic Schools at Risk 'Too Good to Lose' (2018) and 'Beacons of Learning' (1995) both provide numerous examples of how former school buildings, including many across Wales, have been aptly and successfully converted into homes. In a letter opening our 2018 report, HRH The Prince Wales makes the valid point that "*Whilst a number of schools are listed...many have no statutory protection and are vulnerable to summary demolition. It is vital that we act now to preserve this essential part of our heritage.*" This is very relevant to this case.

Secondly, we support the view of The Victorian Society (in their consultee letter dated 8 March 2019) that the applicant does not provide a fair assessment of the school's historic, aesthetic, architectural and communal significance, which are all summarily dismissed as low. The applicant's Heritage Statement repeatedly relies on the assumption that being unlisted (either statutory or locally) and outside a Conservation Area, any historic value and significance the building may have is purely of local rather than national interest, and therefore of lesser importance.

Para 4.63 of the Heritage Statement concludes that "*The school buildings are valued for their architectural interest or evidential value, which, due to their decorative architecture extends to encompass their aesthetic value...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. In this respect, the 1896/1908 school building and its associated contemporary boundary wall, are considered to represent a historic asset, but not one possessing such a degree of significance so as to be considered 'nationally important.'*"

On the contrary, we argue that both the Pre-Application Consultation Report and the 5000 objections to the proposed demolition, including those of the local Town Council, a Welsh Assembly Candidate for the Vale of Glamorgan and a local Councillor, all provide a very clear indication that the school retains significance and value as a historic asset of both local and national importance.

Finally, we consider the demolition of a building of this size and age to be unsustainable in climate terms. We would ask the council to consider the applicant's claim that conversion is "*problematic*" in the context of climate objectives set out in both the National Planning Policy Framework (NPPF) 2019, and their own Local Development Plan (LDP) 2011 – 2026. The NPPF para. 148 states that "*The planning system should support the transition to a low carbon future in a changing climate*" and "*shape places in ways that contribute to radical reductions in greenhouse gas emissions ... including the conversion of existing buildings.*" Objective 2 of the LDP (2011 – 2026) is "*To ensure that development within the Vale of Glamorgan makes a positive contribution towards reducing the impact of and mitigating the adverse effects of climate change.*"

In light of the council's 'Climate Emergency' declaration in May 2019, SAVE calls for the re-use of the former school buildings in the proposed redevelopment of this site in order to meet these important climate commitments. We would also like to draw the council's attention to Historic England's annual research report for 2019 *There's No Place Like Old Homes*, which shows that retrofitting existing historic buildings carries a drastically smaller carbon footprint than demolition.

Policy Assessment

Planning Policy Wales (PPW) and Technical Advice Note (TAN) 24 directs councils to give consideration to all historic assets, both designated and non-designated. A specific objective for protecting the historic environment outlined in PPW Section 6.1.6, requires planning authorities "*safeguard the character of historic buildings and manage change so that their special architectural and historic interest is preserved*". PPW Section 6.1.9 goes on to state 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.*"

The application documents also suggest, “*the loss of the building and the development of the site for housing is already established in principle*” by Policy MG2(18) of the Vale of Glamorgan Local Development Plan (LDP) adopted in 2017, in the site allocation detail for this site. Again, SAVE disagrees strongly with this position. Policy MG2(18) identifies a possible allocation of 20 dwellings, not 34 as this application proposes, and states that “*The Victorian school building has some architectural merit and lends itself to conversion although the building is not currently listed.*” Given that the LDP clearly encourages the retention and reuse of the school, and in the absence of any evidence, viability or otherwise, to prove demolition to be the only option available, the proposed wholesale demolition is unjustified in planning terms.

Conclusion

SAVE objects to this application on the basis it does not justify the complete loss of a NDHA or provide a sufficient assessment of historic significance to enable the council to assess the harm total demolition of the building will cause to the character and historic significance of the local area. Furthermore, SAVE considers these school buildings to be highly suitable for retention and conversion into housing, an outcome which would help meet local housing targets, enhance the historic character of the local area and comply with national and local policy objectives on climate change. For these reasons we recommend the Local Planning Authority refuse the application.

I trust these comments are useful to you and I ask that you keep me informed of further developments. Please contact me at this office should you need further details.

Yours sincerely,



Ben Oakley
Conservation Officer