

Former Cowbridge School, Aberthin Road, Cowbridge

Heritage Summary Report

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1. Introduction

- 1.1 This report has been prepared by The Environmental Dimension Partnership Ltd (EDP), on behalf of Hafod Housing Association, to inform an application for residential development on land at Cowbridge School, Aberthin Road, Cowbridge (hereafter referred to as ‘the site’).
- 1.2 The report provides an overview and summary of the various assessments that have been made of the Cowbridge School and, based on the conclusions of the various reports, describes the school building’s heritage significance. It concludes with a statement as to what the status of the building is in terms of planning legislation and policy and how it should be treated in this regard.

Planning and assessment background

- 1.3 The site is allocated within the *Vale of Glamorgan Adopted Local Development Plan 2011-2026* (adopted on the 28 June 2017) for housing development, under Policy MG2 (18) – Housing Allocations. The site is allocated as Cowbridge Comprehensive Sixth Form Block, Aberthin Road (0.52 hectares (ha)) for 20 housing units. With regard to the school building the allocation states that: *‘The Victorian school building has some architectural merit and lends itself to conversion although the building is not currently listed’*.
- 1.4 An application (2018/01408/FUL) was made in 2018 for: *‘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’*.
- 1.5 Regarding impacts on historic assets, including the school building, the application was accompanied by an Archaeological and Heritage Assessment (EDP, 2019). This report was originally issued in 2018 but was reissued in October 2019. This followed a consultation response from Peter Thomas, Senior Planner (Conservation and Design) at the Vale of Glamorgan Council (VoGC) in February 2019 (Paragraphs **2.11** – **2.13** below). It also followed an assessment by Cadw as to whether the building is of sufficient architectural and historic interest to be designated as a listed building. Cadw issued a statement following this assessment, also in February 2019 (Paragraphs **2.7** – **2.10** below).
- 1.6 A further consultation response was issued by The Victorian Society in March 2019.
- 1.7 Additionally, two independent studies have been produced that address the school building and its heritage significance. These comprise a Historical and Architectural Appraisal

(Rob Scourfield, June 2019) and a Heritage Visual Impact Assessment (Dr Tudur Davies, January 2019).

- 1.8 Since the Scourfield report was produced, a further request was made for Cadw to consider the building for listing. This request was declined by Cadw, subsequent to which a rebuttal was made to Cadw's decision by Rob Scourfield. In September 2019 the Welsh Heritage Minister declined a request for an enquiry on the decision not to list the school, supporting Cadw's decision on this matter. Details on the salient points of this debate are set out in **Section 2** below.

2. Summary of Assessments

- 2.1 This section presents a summary of the conclusions of the various consultation responses and assessments. It begins with the 2019 EDP assessment, and then outlines the other consultee responses and assessments in chronological order.

Archaeology and Heritage Assessment (EDP, October 2019)

- 2.2 The EDP report describes the history of the school with reference to historic maps and archival research at the Glamorgan Archives. The following key conclusions are drawn:

- The school was established in 1896 as the Cowbridge Intermediate School for Girls under the provisions of the Welsh Intermediate Education Act of 1889;
- Local philanthropist John Bevan acted as a benefactor, funding a hostel for 12 boarders at the school, as well as a library and scholarship fund;
- The school was extended in 1908 with a laboratory, gymnasium and classrooms added; and
- The school then became a Secondary or High school after 1912, retaining its boarders until 1939 and from the 1970s becoming an outlying facility for the large modern comprehensive school to the north.

- 2.3 The EDP report describes the building's exterior in some detail but not its interior, which was not accessed. Key architectural observations on the exterior are:

- That the older part of the building, dating from 1896 is of a very similar style and material palette to the later 1908 section;
- The building has a typical late-Victorian school style reminiscent of the Queen Anne Style that was popular in England and which blended Gothic with Italianate elements;

- The building is finished in local, dressed, sandstone blocks laid in random courses, a typical building material for the locality, with Bath Stone decorative features such as lintels, sill bands, coping, gable apex stones and kneelers, quoins and corning;
- Features of architectural interest include its multiple gables on the south-east and north-east side which display stone copings and other decorative stonework, and its varied fenestration, comprising round, rectangular, slit and large arch headed windows; and
- The building is damaged in places with missing stonework and boarded windows as well as invasive vegetation.

2.4 The report then summarises the building's significance using the terminology derived from Cadw's *Conservation Principles* (2011). The following conclusions are drawn:

Evidential Value

- The school has a degree of functional interest in its architecture, which is typical of late-Victorian school construction, with large windows to light classrooms and halls, and rows of gables fronting the building;
- The building reflects the Queen Anne Style common to school buildings of the era but has a vernacular quality in that it is finished in materials typical to south Wales;
- The school's evidential value is the prime heritage interest but is not particularly great, given that of a fairly recent period and that it was one of many schools built during this period; and
- The school's evidential value reflects a low degree of heritage significance.

Historical Value

- The school is of some local historical interest, through its association with the development of education in Cowbridge, in particular of girls' education;
- The school also has local interest through its association with the local landowner and philanthropist John Bevan; and
- The school has little wider historical interest, being of local interest and having a low degree of heritage value.

Aesthetic Value

- The building's decorative features, use of materials, stonework, and the appearance of its main elevations contribute to its aesthetic value; and
- The building is attractive and locally prominent and thus possesses a moderate degree of aesthetic value.

Communal Value

- The school is out of use and its communal value is restricted to it representing a feature of local peoples' memories and it is considered unlikely to be well-known beyond the local area; and
- The report assesses a low degree of communal value.

2.5 The assessment concludes that the 1896/1908 parts of the school building represent a historic asset comprising *'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'*.

2.6 It goes on to state that, in 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.

Cadw listing assessment

2.7 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.

2.8 Cadw issued a statement via email on 04 February 2019 stating that the school building does not meet the published criteria and 'high standard' for listing. It sets out how the building would also have been considered and rejected for listing in 1999 when Cadw undertook a community resurvey to identify historic buildings in Cowbridge.

2.9 In summary, Cadw identified the following 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 (which are now mostly PVC) and interior features such as fireplaces;
- The 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.

2.10 The Cadw assessment concludes that the school building represents an historic asset of local significance.

Initial Consultation responses

Peter Thomas, Senior Planner (Conservation and Design)

2.11 Peter Thomas, Senior Planner (Conservation and Design), issued advice to the Vale of Glamorgan Council's (VoGC) Case Officer regarding the potential impact of the proposed development on historic assets and their settings on 7 February 2019.

2.12 The following key comments and recommendations were made:

- He agrees with the decision by Cadw not to include the building on the statutory list and he does not recommend serving a building preservation notice;
- He states that presently the building does not have statutory or local designation;
- He also states that the building has some historic/architectural merit and considers it against the criteria for inclusion on the local list of 'County Treasures', concluding that he will be recommending that the building should be included on the list;
- He concludes that the proposal would not result in any direct harm or 'harm to the setting' of any locally listed building, scheduled monument, listed building or conservation area;
- He also concludes that, given the school building's architectural and historical qualities, the proposal would result in the loss of a 'locally significant historic asset' and should be considered under Policy SP10 of the Local Development plan (LDP);
- He recommends that if the proposals are approved then a condition should be included requiring a Level 3 building record; and
- His final recommendations are that the building should be included on the local list and that the application should be refused under Policy SP10 of the local plan.

2.13 With reference to the assessment of the building as a 'County Treasure' the response details how, in terms of the criteria set out in the County Treasures Supplementary Planning Guidance (VoGC, 2009), it is considered that the building meets 1, 2, 3 and 5. However, the advice note references an Appendix detailing this assessment which is not included and has not, to date, been seen.

The Victorian Society

2.14 The Victorian Society (VS) issued a letter to the VoGC on the 08 March 2019. The VS do not object to the principle of development on the site although they do object to the demolition of the school building.

2.15 They express that they support the Senior Planner's recommendation to include the school building on the local list of 'County Treasures' and agree with the Cadw assessment that the building is 'locally significant'.

2.16 The letter contains a tranche of background information about the historical context of the school and draws the following conclusions:

- That the building was probably designed by the local architect Robert Williams,
- That the building was one of 94 County Intermediate schools established in Wales between 1889 and 1900,
- That the building possesses additional communal value through its association with the local benefactor and philanthropist John Bevan, and
- That the 'county schools' were distinctive, and the Cowbridge School was representative of a newly-established Welsh rural county school.

Independent Assessment reports

Heritage Visual Impact Assessment (Dr Tudur Davies, January 2019).

2.17 This report is not available online nor has it been submitted to Hafod Housing Association or to the VoGC planning application portal. It is presumed that it was written for the local resident's group in favour of the school's preservation.

2.18 Although it has not been seen, based on the references to it in the Scourfield report (below), it is understood that the report comprises a visual assessment of the school and is chiefly concerned with the school's role in relation to the setting of the Cowbridge Conservation Area. As the present summary report is concerned with reviewing and understanding the significance of the school building itself, the Davies report is of limited relevance and thus has not been considered in this report.

Historical and Architectural Appraisal (Rob Scourfield, June 2019)

- 2.19 The Scourfield report was written for a local residents' group opposed to the proposed demolition of the school. It reviews and reassesses the corpus of assessment reports available at the date it was written. It also presents the findings of additional research into the school and its history and, on the basis of this additional information, ascribes the school a 'very high architectural and historical importance', stating that the building should be a candidate for statutory listing and local listing as a 'County Treasure'.

Additional historical information and interest

- 2.20 The report provides a detailed historical background. In this discussion it sets out how, whilst the school was one of over 90 new schools built under the Welsh Intermediate Education Act prior to 1900 and not the first (which was completed at Caernarfon in 1894), it was the first all-girls Intermediate School in Wales. As a girls' school it was not unique in this regard, as others followed and the Intermediate Schools also included mixed and dual schools.
- 2.21 The report provides further background detail on the planning and design of the Intermediate schools, illustrating how the Cowbridge school was influenced by an architectural competition, the Tate Intermediate School Competition, and its requirements and, in this respect is defined as an 'excellent survival of a Tate Competition type'.
- 2.22 The report describes how the Cowbridge school's hostel was an unusual feature which diverges from the typical plan for the intermediate schools. The provision of a hostel was funded by John Bevan and the report sets out further background information on John Bevan's history and the circumstances behind his philanthropy. This was ongoing during a period in which the Grammar school in Cowbridge refused to join the intermediate school scheme, resulting in a parliamentary row which inspired the establishment of the girls' school.
- 2.23 The report also provides further information on the school's architectural context, amongst other Intermediate Schools in Wales of this era. It highlights how these schools were typically single storey and symmetrical, with a central hall and gabled classrooms either side. It also describes how many were relatively plain and built in brick or local stone and that the greatest architectural embellishment was typically in the treatment of the gables. In this respect, the Cowbridge school fits this typical scheme. It also, like the EDP assessment, identifies an influence at the Cowbridge school from the Queen Anne Style that characterised the London Board schools.
- 2.24 The report identifies that the entrance to the school, whilst modest, was enhanced by its position within the hostel range and emphasised by the adjacent crow-stepped stairwell. This is claimed as a counter-argument to Cadw's suggestion that the school has no 'formal entrance'.
- 2.25 The Scourfield report provides a degree of detail on the interior of the building, including some photographs, and in this respect fills a gap in information in the original EDP assessment. Notable internal features are described as:

- The open roof of the 1890's central hall with wooden beams;
- The entrance and stairwell of the 1890s including a damaged wooden banister and newels;
- The 1909 plan of corridors and classrooms;
- Glazed door screens and wooden doors which are nevertheless typical features of late Victorian Board schools; and
- Some brick-built fireplaces.

2.26 The report highlights some features of architectural individuality at the school which add interest to its aesthetic. These comprise:

- The serried dormer gables to the hall block;
- The tall hostel block with its gabled porch and crow-stepped stairwell;
- The 1909 fashionable curved gables in the classroom block;
- The large 1909 'Diocletian' window at the north end of the building;
- Its striking tall chimneys, typically removed by local authorities;
- Its cast-iron ridge vents; and
- The use of rock-faced limestone and ashlar rather than brick.

2.27 A fundamental theme of the Scourfield report is its critique of the Cadw decision not to list the school building. The report compares the Cowbridge school with other listed school buildings of the same era drawing comparisons and concluding that '*Cowbridge's plan-form and internal detail survive at least to an equivalent degree as other listed examples*'.

2.28 The Scourfield report sets out a detailed biography and history for the school's probable architect Robert Williams, describing his life, political motivations and career and describing some of the buildings that he designed. It also presents a similar biography for the architect of the 1909 part of the building, R.S. Griffiths.

Conclusions

2.29 The report concludes with an articulation of the school's heritage significance, rating it highly and dismissing the previous EDP assessment as inadequate in fully understanding the significance of the school.

2.30 Contributing aspects of the school's significance are described as:

- Its historical association with the local political situation at the time of its construction;
- That the school was the first girl's intermediate school in Wales;
- The evidential value in its retained plan and interesting fixtures, comprising glazed doorways, staircase, open timbered roofs and fireplaces;
- Its association with the architect Robert Williams who is stressed as a figure deserving of greater accolade than he is given;
- The 'strong' aesthetic value in the building's architectural detail and use of stone as a building material; and
- The communal value exemplified by the popular support for the school's retention.

2.31 The report concludes that it supports the position of Peter Thomas, Senior Planner that the building should be designated as a 'County Treasure'. It goes further and suggests that, on account of the additional historical information presented in the report and assessment of the building's architectural importance, that it should be reconsidered for statutory listing by Cadw, and that the VoGC should issue a Building Preservation Order.

Subsequent responses/rebuttal

Cadw

2.32 Following the issue of the Scourfield report, Cadw were asked to re-consider their recommendation that the Cowbridge school does not meet the criteria for listing. A response to the Scourfield report was issued by Cadw in August 2019. In it Cadw conclude that the evidence presented in the Scourfield report does not add up to a strong enough case that their earlier position should be overturned.

2.33 Their response considers Mr Scourfield's salient points regarding the school's significance and the reasons for it being reconsidered for listing, countering them with the following:

- That there is no special significance attached to the fact that Cowbridge was built as a girls' school, as education for girls was envisaged by the Welsh Intermediate Act, and it was a matter of local choice as to how it was delivered. Other listed examples reflect the diversity of arrangements for providing education for both girls and boys under the Act;
- There is no special significance in its age as a girls' school as it was very swiftly followed by what is now Harold Road Junior School, Abergavenny, built as an Intermediate Girls school in 1897;

- The local political controversy surrounding the establishment of the school, whilst interesting, was not the only instance of political controversy over the provision of the Act in Wales and thus was not unique;
- Whilst the school's accommodation of boarders is unusual, and the block architecturally distinctive, it is not of sufficient interest to tip the balance in favour of listing when compared with other listed examples;
- In terms of its architectural distinction, it is considered by Cadw that the original character of the school was superseded by the 1909 extension which, whilst sympathetic to the original, overwhelms it in terms of scale and thus the dominant character of the building is of 1909 rather than 1896;
- When compared with listed examples of the same era, the school is not as architecturally distinctive or of the same architectural quality; and
- That the school has had windows replaced with uPVC, eroding its historic character.

2.34 The response concludes that the building does not meet the criteria for listing but is of local importance and might warrant inclusion on the Vale of Glamorgan's County Treasures list.

Rob Scourfield's response

2.35 In response to the Cadw position set out above, in August 2019 Rob Scourfield issued a further rebuttal. The note reasserts the conclusions of the earlier report regarding the opinion that the school is highly significant. It also criticises Cadw's position stating that it pays little heed to policy and guidance concerned with assessing heritage significance (such as Technical Advice Note (TAN) 24 and Conservation Principles).

2.36 In summary the response makes the following statements:

- That Cadw have failed to recognise the importance of Robert Williams as an architect especially in the context of him being Welsh;
- That the school being the first girls' Intermediate school in Wales is important and should resonate with Welsh historic pride and the aspiration of the Welsh government for gender equality;
- That the school was especially unusual in that it introduced boarders within the new ethos of intermediate education and that it accepted private funding to make this possible;
- It is argued that the school does retain its original historic character, that the 1909 extension was tactful and skilful, and that regardless, extension is common to many historic buildings including listed buildings and is not relevant to the principles of listing. In this

respect, it draws a comparison with the listed Coed-y-Lan intermediate school in Pontypridd which dates from 1893 and was extended in 1910;

- That the plan form and internal fixtures are as complete as in other listed examples and gives examples of other listed buildings with limited internal preservation; and
- That the replacement of windows, whilst reflecting a loss of evidential value, should not preclude listing as there are examples of other listed buildings which have had the same treatment. It states that the architectural character of the school is in its '*solid mass/construction and a dramatic roofline rather than prominent fenestration*' and thus it should still score highly in terms of aesthetic value.

2.37 The statement concludes that Rob Scourfield is of the firm view that the school fulfils the main criteria for listing and scores highly in terms of the criteria set out in Conservation Principles.

Welsh Government – Independent review

2.38 Following the submission of a petition requesting that the school be saved from demolition, the Welsh Government sought an independent review of the Cadw decision to not list the building from the building historian and archaeologist Richard Hayman. Mr Hayman concurred with Cadw in supporting the decision not to list the school.

2.39 A letter from the Deputy Minister for Culture, Sport and Tourism draws a line under the decision by categorically stating that:

'I am satisfied that the assessments that I have received from my officials and Mr Hayman are unbiased and have been carried out to a highly professional standard. To be listed, buildings have to be of national importance on account of their special architectural or historic interest and I do not consider that Cowbridge School has sufficient quality or character to be listed at the national level, nor is it one of the best examples of its type. Neither do I consider there to be a case for requesting further independent advice or peer review by organisations from England or Scotland'.

3. The Significance of the Cowbridge School

3.1 Drawing from the various assessments of the significance of the former Cowbridge Comprehensive School the following paragraphs present a summary of the school's significance, referencing the categories defined in Conservation Principles (in each case given in full in italic text below).

Evidential value

'This derives from those elements of an historic asset that can provide evidence about past human activity, including its physical remains or historic fabric. These may be visible and relatively easy to assess, or they may be buried below ground, under water or be hidden by later fabric. These remains provide the primary evidence for when and how an historic asset was made or built, what it was used for and how it has changed over time. The unrecorded loss of historic fabric represents the destruction of the primary evidence. Additional evidential values can be gained from documentary sources, pictorial records and archaeological archives or museum collections. To assess the significance of this aspect of an asset, all this evidence needs to be gathered in a systematic way and any gaps in the evidence identified.'

3.2 The school's evidential value comprises:

- The functional interest in its architectural detail and room plan in relation to its use as a school;
- The interest in its use of vernacular stone as a building material rather than brick reflecting local building traditions;
- The functional interest in its internal features such as the staircase, fireplaces and fixtures and fittings as they relate to its use as school and how it was experienced in its early history. The screen door surrounds are standard features of late 19th/early 20th century Board schools as witnessed at the former Tonypany Primary School and the former Penygraig Infants school; and
- The interest in its unusual boarders' block, it reflecting a locally specific function of the building related to its history of use by its attendant community and the history of its benefactor John Bevan.

Historical Value

'An historic asset might illustrate a particular aspect of past life or it might be associated with a notable family, person, event or movement. These illustrative or associative values of an historic asset may be less tangible than its evidential value but will often connect past people, events and aspects of life with the present. Of course, the functions of an historic asset are likely to change over time and so the full range of changing historical values might not become clear until all the evidential values have been gathered together. Historical values are not so easily diminished by change as evidential values and are harmed only to the extent that adaptation has obliterated them or concealed them.'

3.3 The school's historical value comprises:

- Its probable association with the architects Robert Williams and R.S. Griffiths;

- Its association with the work of the local philanthropist John Bevan; and
- Whilst the school may have been the first girls' Intermediate School in Wales, Cadw's position does make it clear that this was not a particular accolade or honour unique to the school as, in a general sense, girls' education was intended as part of the Act and other girls' schools were built elsewhere very soon afterwards. However, evidently, the school is of local historical interest due to its association with the implementation of the Act in Cowbridge and the history of girls' education in the town. This interesting local history includes the parliamentary controversy associated with the Grammar school which led to its establishment and John Bevan's donations.

Aesthetic Value

'This derives from the way in which people draw sensory and intellectual stimulation from an historic asset. This might include the form of an historic asset, its external appearance and how it lies within its setting. It can be the result of conscious design or it might be a seemingly fortuitous outcome of the way in which an historic asset has evolved and been used over time, or it may be a combination of both.'

The form of an asset normally changes over time. Sometimes earlier pictorial records and written descriptions will be more powerful in many people's minds than what survives today. Some important viewpoints may be lost or screened, or access to them may be temporarily denied. To assess this aspect of an asset, again the evidence of the present and past form must be gathered systematically. This needs to be complemented by a thorough appreciation on site of the external appearance of an asset in its setting.

Inevitably understanding the aesthetic value of an historic asset will be more subjective than the study of its evidential and historical values. Much of it will involve trying to express the aesthetic qualities or the relative value of different parts of its form or design. It is important to seek the views of others with a knowledge and appreciation of the historic asset on what they consider to be the significant aesthetic values.'

3.4 The school's aesthetic value comprises the building's architecture which includes decorative features. This includes the following features of architectural interest:

- The building's late-Victorian school style reminiscent of the Queen Anne Style that was popular in England and which blended Gothic with Italianate elements;
- Its varied fenestration, comprising round, rectangular, slit and large arch headed windows albeit with many frames replaced with modern uPVC;
- The serried dormer gables to the hall block;
- The tall hostel block with its gabled porch and crow-stepped stairwell;

- The 1909 fashionable curved gables in the classroom block;
- The large 1909 'Diocletian' window at the north end of the building;
- The building's tall chimneys, which elsewhere have typically been removed by local authorities;
- Its cast-iron ridge vents;
- The use of rock-faced limestone and ashlar rather than brick, giving an attractive finish that reflects the vernacular architecture; and
- Surviving internal features such as the stair and newels, high beamed classroom ceilings and the open-roofed hall.

Communal Value

'This derives 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. It is closely linked to historical and aesthetic values but tends to have additional or specific aspects. Communal value might be commemorative or symbolic. For example, people might draw part of their identity or collective memory from an historic asset or have emotional links to it. Such values often change over time and they may be important for remembering both positive and uncomfortable events, attitudes or periods in Wales's history. Historic assets can also have social value, acting as a source of social interaction, distinctiveness or coherence; economic value, providing a valuable source of income or employment; or they may have spiritual value, emanating from religious beliefs or modern perceptions of the spirit of a place'.

- 3.5 The school's communal value comprises its role as a locally prominent building and its function as a community facility that was a feature of the lives of many local people when it was in operation as a school. Now, although much of this value has been lost through the school's disuse, the popular support for its retention does reflect a degree of local, social value retained by the building.

Summary of Significance

- 3.6 The significance of the former Cowbridge School has been assessed by a variety of heritage professionals from a variety of standpoints, including consultants working on behalf of the developer and on behalf of the local movement to preserve the building. It has also been closely assessed by the VoGC's Senior Planner (Conservation and Design) and Cadw's Assistant Inspector of Historic Buildings. In addition, the case has been reviewed by other professionals at Cadw and a Welsh Minister, supported by an independent expert review.

- 3.7 Cadw, the VoGC Senior Planner (Conservation and Design), the Deputy Minister for Culture, Sport and Tourism and the independent reviewer all conclude that the building is not of such high significance that it should be ascribed a national designation as a listed building; as such it has to be concluded that the building is not of 'national importance' for its special architectural and historical interest and must therefore be of lower heritage value.
- 3.8 In summary, the school is clearly a historic asset, and possesses a degree of heritage value in respect of all four categories defined in Conservation Principles. Of these, it is arguable that the greatest value lies in its aesthetic interest on account of its attractive architectural finish. All of its values are founded in local interest. Its evidential value reflects the use of local building materials, while its unusual boarders' block reflects a response to local historic needs. Its historical value is derived from a history concerned with local controversy and an act of benevolence by a local philanthropist. Whilst its original part was probably designed by an architect who worked across Britain, Robert Williams is not a figure who is nationally famous, and neither is R.S. Griffiths.
- 3.9 Whilst it is an attractive building with at least a moderate degree of aesthetic value, it fits into a wider scheme of similar buildings of the era and its prominence and appreciation is within a local context. Finally, its communal value is undoubtedly in terms of its meaning and significance in a local context and its role in the lives of people from, or living in, Cowbridge.
- 3.10 As such, it seems correct to conclude that the building is, in accordance with the opinion of Cadw and the VoGC's Senior Planner (Conservation and Design), a historic asset of local importance.

4. Conclusion

- 4.1 Further to the summary of the significance of the former Cowbridge School, as set out above, the paragraphs below confirm the status of the building in terms of planning policy.
- 4.2 As set out above, it is concluded that the building is not of 'national importance' and therefore the impact of its proposed demolition does not need to be considered under the *Planning (Listed Buildings and Conservation Areas) Act of 1990*.
- 4.3 Peter Thomas, VoGC's Senior Planner (Conservation and Design) outlines that, in his opinion, the building meets four out of five criteria as set out in the County Treasures Supplementary Planning Guidance (SPG; 2009) and therefore that he recommends that the school be added to this scheduled of elements of the historic environment in the VoG that are of '*considerable local interest and value*'.
- 4.4 It should be noted however that the SPG references a superseded Local Plan and is now out of date. The SPG is currently scheduled to be reviewed but with no timescale defined.

- 4.5 If granted status as a locally listed 'County Treasure' the effects of the development would need to be considered against overarching Strategic Policy (SP10) and a more specific Managing Development policy (MD8). These are reproduced below:

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 local 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; and*
- 4 *For sites of archaeological interest, development proposals must preserve or enhance archaeological remains and where appropriate their settings'.*

- 4.6 It is notable that, in respect of impacts upon listed buildings, both Policies SP10 (1) and MD8 (2) do not accord precisely with the wording of PPW or Section 66(1) of the 1990 Act. The statutory requirement is to have 'special regard' to the 'desirability' of preserving a listed building and its setting, rather than requiring that (as per SP10 (1)) 'development proposals

must preserve the *'architectural and/or historic qualities of locally listed buildings'* or (as per MD8 (2)) must preserve or enhance *'the building its setting and any features of significance it possesses'*.

- 4.7 As such, for locally listed buildings, adherence to these policies would therefore give such buildings greater protection than afforded by national planning policy or heritage legislation to nationally designated, listed buildings and, given their lesser degree of significance, this does not seem a robust approach.
- 4.8 As such, in such circumstances, it is recommended that primacy be given to national policy regarding decision making. Under Planning Policy Wales (PPW) Edition 10 (Welsh Government, 2018), one of the Welsh Government's specific objectives for the historic environment seeks to *'safeguard the character of historic buildings and manage change so that their special architectural and historic interest is preserved'*.
- 4.9 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'*.
- 4.10 TAN 24 states that, at paragraph 8.1 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.'*
- 4.11 In this respect, the demolition of the school would result in the loss of an historic asset of local significance. This loss would have to be fully considered in the planning balance.
- 4.12 If a decision is made to approve the proposal and demolish the building, reference should be made to Paragraph 6.1.27 of PPW (2018) which states the following in respect of the Local Planning Authority's obligations regarding archaeological remains:
- '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'*.
- 4.13 In this instance, the appropriate 'recording and investigation' would be through recourse to the creation of a Historic Building Record of the school in line with ClfA guidance (ClfA, 2020). The building survey would create a lasting record of the former school. A survey to Level 3, as set out in Historic England's *Understanding Historic Buildings: A Guide to Good Recording Practice* (2016) would comprise the compilation of a systematic account of the building's origins, development and use, a drawn record illustrating the building's appearance and structure

including a measured survey of the building's exterior and a photographic and descriptive record compiled during a site visit.

5. References

Cadw, 2011, *Conservation Principles for the Sustainable Management of the Historic Environment in Wales*

CIfA, 2020, *Standard and Guidance for the Archaeological Investigation and Recording of Standing Buildings or Structures*

Davies, T. 2019, *Former Cowbridge School, Heritage Visual Impact Assessment*

EDP, 2019, *Former Cowbridge School, Aberthin Road, Cowbridge, Archaeological and Heritage Assessment.*

Historic England, 2016, *Understanding Historic Buildings: A Guide to Good Recording Practice*

Scourfield, R. 2019, *Former Cowbridge Comprehensive School, Aberthin Road, Cowbridge - An Historical and Architectural Appraisal*

Welsh Government 2016, *Planning Policy Wales Edition Ten* Cardiff

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

Vale of Glamorgan Adopted Local Development Plan 2011-2026 (adopted on the 28 June 2017)