



HERITAGE IMPACT ASSESSMENT

ST. NICHOLAS CIW PRIMARY SCHOOL - PROPOSED DEMOLITION AND
REPLACEMENT SCHOOL BUILDING

*Prepared by Vale of Glamorgan Council Planning Policy Team
on behalf of 21st Century Schools Team July 2020*



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Applicant: *21st Century Schools Team, Vale of Glamorgan Council*

Location: *St. Nicholas CiW Primary School, St. Nicholas*

Proposal: *Replacement primary & nursery school and associated works.*

1. INTRODUCTION

- 1.1. The Vale of Glamorgan Council's Planning Policy Department has been instructed by the 21st Century Schools Team (referred to as the applicant) to undertake a Heritage Impact Assessment in preparation for the submission of a full planning application for a replacement Primary School with nursery provision included. The proposal comprises a predominantly 1-storey primary school building with associated works to accommodate playing fields, car parking, and on-site traffic.
- 1.2. The 21st Century Schools Programme is a long-term strategic investment in educational estate throughout Wales and is a unique collaboration between the Welsh Government, the Welsh Local Government Association (WLGA), local authorities, colleges and diocesan authorities.

2. SITE LOCATION AND CONTEXT

- 2.1. The proposed location for the new school development is the current school site. The site sits at the northern edge of the village of St. Nicholas in the Vale of Glamorgan. St. Nicholas is located 2 miles to the west of Cardiff. It sits alongside one of the main vehicular routes in to the city; the A48. To the south and east of the school site there are residential areas, with new housing developments recently built on the eastern edge of the village. The site is on the northern edge of the St. Nicholas conservation area. Farmland neighbours the site to the immediate north and west. Further to the west is Cottrell Park Golf Course and the village of Bonvilston.
- 2.2. The school building currently sits at the southern end of the site, overlooking School Lane. There is currently a single vehicular entrance point in the south eastern corner, which provides access to the car park, located on the eastern side of the school building. The main hard play area is on the western side of the school building, wrapping around to the north. Further beyond is an enclosed grass play area with external furniture. Beyond the fence line at the north of the grass play area are sports pitches and an established habitat area. At the front of the school site in the south, there are smaller enclosed external play areas.
- 2.3. The existing school building lies within the St Nicholas Conservation Area, however, the playing fields which relate to the school are excluded from the designation.

3. LEGISLATION AND RELEVANT PLANNING POLICY

3.1.1. This section of the Report outlines the relevant national and local planning policy in relation to the proposed development. The applicable legislation has also been set out in this section.

3.2. RELEVANT LEGISLATION

HISTORIC ENVIRONMENT (WALES) ACT 2016

3.2.1. The **Historic Environment (Wales) Act (2016)** requires any application for listed building or conservation area consent in Wales to be accompanied by a heritage impact statement. The details of what must be included in a heritage impact statement are set out in The **Planning (Listed Buildings and Conservation Areas) (Wales) (Amendment No. 2) Regulations 2017**. In relation to an application for conservation area consent, a heritage impact statement must contain:

- a) a description of the proposed works (“the demolition works”), including a schedule of works;
- b) an explanation of the objective that the demolition works are intended to achieve and why demolition is desirable or necessary;
- c) a description of the contribution any building which is proposed to be demolished makes to the character or appearance of the conservation area;
- d) an assessment of the impact of the demolition works on the character or appearance of the conservation area, including a description of any potential benefits or harm to the character or appearance of the area;
- e) a summary of the options considered for the purpose of achieving the objective referred to in point (b) and the reasons why demolition is preferred.

3.3. NATIONAL PLANNING POLICY

PLANNING POLICY WALES (PPW) EDITION 10 (2018)

3.3.1. An element of the proposed development is located within the St Nicholas Conservation Area. PPW states “The planning system must take into account the Welsh Government’s objectives to protect, conserve, promote and enhance the historic environment as a resource for the general well-being of present and future generations.” (PPW, para.6.1.5, 2018). In relation to Conservation Areas “There should be a general presumption in favour of the preservation or enhancement of the character or appearance of conservation areas or their settings. Positive management of conservation areas is necessary if their character or appearance are to be preserved or enhanced and their heritage value is to be fully realised.” (PPW, para.6.1.14, 2018). PPW outlines that developments can achieve the preservation or enhancement of Conservation Areas through either making “a positive contribution to an area’s character or appearance or leaves them unharmed. Mitigation measures can also be considered which could result in an overall neutral or positive impact of a proposed development in a conservation area.” (PPW, para.6.1.16, 2018). It should also be noted that 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. However, in exceptional cases, the presumption may be overridden in favour of development considered desirable on public interest grounds. (PPW, 2018).

TECHNICAL ADVICE NOTE (TAN) 24: THE HISTORIC ENVIRONMENT (2017)

- 3.3.2. The purpose of TAN 24 is to outline how the planning system considers the historic environment. The historic environment is defined as “All aspects of the environment resulting from the interaction between people and places through time, including all surviving physical remains of past human activity, whether visible, buried or submerged, and deliberately planted or managed.” (TAN 24, para.1.7, 2017).
- 3.3.3. Specifically, in relation to Conservation Areas TAN 24 states “Many conservation areas include the commercial centres of towns and villages. Generally, there will be 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. 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.” (TAN 24, para.6.7, 2017)
- 3.3.4. Regarding the demolition of buildings within a Conservation Area “There should be a general presumption in favour of retaining buildings, which make a positive contribution to the character or appearance of a conservation area... In cases where it is considered a building makes little or no contribution, the local planning authority will normally need to have full information about what is proposed for the site after demolition. Consent for demolition should not be given without acceptable and detailed plans for the reuse of the site unless redevelopment is itself undesirable.” (TAN 24, para.6.13, 2017).

3.4. LOCAL PLANNING POLICY

VALE OF GLAMORGAN LOCAL DEVELOPMENT PLAN (LDP) 2011 - 2026

- 3.4.1. Objective 4 of the LDP is considered relevant to the proposal as it states the LDP will seek “**To protect and enhance the Vale of Glamorgan’s Historic, built, and natural environment**” (LDP, p.26, 2017).
- 3.4.2. **Policy SP1 - Delivering the Strategy** - This policy outlines the framework that will enable the Local Authority to achieve the LDP strategy. In relation to the proposed development criterion 6 “protecting and enhancing the built, natural and coastal environment” (LDP, p.38, 2017).
- 3.4.3. **Policy SP10 - Built and Natural Environment** - This policy emphasises the need to protect the Vale of Glamorgan’s natural and built environment assets and reinforces that sensitive design and choice of location of new development can have a positive effect on the built and natural heritage of the Vale of Glamorgan. It requires new development to minimise the impact on natural

systems and provide opportunities for the creation of habitats or enhance existing habitats.

- 3.4.4. **Policy MD8 - Historic Environment** - This policy sets out the designated areas and buildings which require special protection and consideration regarding their specific qualities that add to the built and historic environment. These designations include; conservation areas, listed buildings and locally listed buildings, designated landscapes, historic parks and gardens, battlefields and sites of archaeological interest.

ST. NICHOLAS CONSERVATION AREA APPRAISAL AND MANAGEMENT PLAN (2009)

- 3.4.5. The **St. Nicholas Conservation Area Appraisal and Management Plan (CAAMP)** was adopted as supplementary planning guidance (SPG) and is a material consideration where development proposals would impact upon the St. Nicholas Conservation Area. The St. Nicholas CAAMP builds upon policy set out by the Welsh Assembly in Planning Policy Wales and Circular 61/96, and local policy including the Vale of Glamorgan Supplementary Planning Guidance 'Conservation Areas in the Rural Vale' (1999). This document provides a further, firm basis on which applications for development within, and close to the St. Nicholas Conservation Area can be assessed.

CONSERVATION AREAS WITHIN THE RURAL VALE SPG (2006)

- 3.4.6. The **Conservation Areas within the Rural Vale SPG**, outlines how the Council will protect and co-ordinate development within Conservation Areas in the rural Vale. The SPG identifies St. Nicholas as a rural conservation area and sets out the following key issues:
- The protection and maintenance of the framework provided by stone boundary walls and garden hedges.
 - The maintenance and enhancement of tree groups which frame the entrance to the village from east and west.
 - The enhancement of housing backwaters to the north and south of the A48.
 - The mitigation of the effects of fast-moving traffic along the A48.
 - The consideration of development proposals with the benefit of Supplementary Planning Guidance to villages in the rural Vale.

3.5. ADDITIONAL GUIDANCE

HERITAGE IMPACT ASSESSMENT IN WALES - CADW

- 3.5.1. This guidance document sets out the general principles to consider when planning changes to historic assets and applying for listed building, conservation area and scheduled monument consent.
- 3.5.2. This best-practice guide is aimed principally at owners, occupiers and agents of historic assets to help them understand why, when and how to use the heritage impact assessment process and write heritage impact statements. It should also help them to take account of Cadw's Conservation Principles for the Sustainable Management of the Historic Environment in Wales (Conservation Principles) to achieve high-quality sensitive change, using the principles of good design.

4. HERITAGE IMPACT STATEMENT

4.1.1. Guidance produced by Cadw in relation to producing heritage impact assessments in Wales states “Your heritage impact assessment should take into account sufficient information to enable both the significance of the asset and the impact of change to be understood. It should be proportionate both to the significance of the historic asset and to the degree of change proposed.” (Cadw, p.5, 2017). The following assessment is considered to be proportionate to the proposed change and follows the requirements of the legislation

4.2. A DESCRIPTION OF THE PROPOSED WORKS (“THE DEMOLITION WORKS”), INCLUDING A SCHEDULE OF WORKS;

4.2.1. The proposed demolition works comprise of the following:

- the demolition of the existing school building (St. Nicholas CiW Primary School)

4.2.2. All material associated with the above buildings will be demolished and removed from site. The demolition works will be undertaken by a responsible contractor.

4.3. AN EXPLANATION OF THE OBJECTIVE THAT THE DEMOLITION WORKS ARE INTENDED TO ACHIEVE AND WHY DEMOLITION IS DESIRABLE OR NECESSARY

4.3.1. The demolition works will enable the rebuilding of the replacement school including improving staff parking and parent drop-off / pick up facilities. The demolition works are desirable, as the current school building is dated and not considered visually pleasing within the setting of the St. Nicholas Conservation Area due to its close proximity to the street frontage.

4.3.2. The purpose of the replacement building is to provide a sustainable facility for the school to operate within that meets the increased need for additional pupil spaces and achieving the BREEAM Excellent accreditation for sustainable buildings. The objective is to transform the site, so that there is one building which would lie outside of the conservation area. The proposal includes a staff parking area and allows for parent pick up and drop off. It is considered this would not detract from the Conservation Area as the land would remain open in nature and help in removing parked vehicles accessing the school which park within the village which would otherwise detract from the historic assets located within the Conservation Area.

4.4. A DESCRIPTION OF THE CONTRIBUTION ANY BUILDING WHICH IS PROPOSED TO BE DEMOLISHED MAKES TO THE CHARACTER OR APPEARANCE OF THE CONSERVATION AREA

- 4.4.1. The existing school is a prefabricated single storey structure. UPVc panels are the predominant material to the elevations with wooden style cladding elements breaking up the elevations. The St Nicholas CAAMP does not identify the existing building as having special architectural merit or contributing to the overall character of the Conservation Area. Although, the school building does not have architectural merit the presence of a school within St Nicholas has a historic value. A school has existed within the village since the 1870s being originally built to accommodate the growing population of the village. The proposed development would retain a school use within the village which is considered to appropriately reflect the historic and current needs of the village.

4.5. AN ASSESSMENT OF THE IMPACT OF THE DEMOLITION WORKS ON THE CHARACTER OR APPEARANCE OF THE CONSERVATION AREA, INCLUDING A DESCRIPTION OF ANY POTENTIAL BENEFITS OR HARM TO THE CHARACTER OR APPEARANCE OF THE AREA

- 4.5.1. The demolition of the existing school would not have a detrimental impact upon the character of the conservation area as the building is not considered to relate to the prevalent character of buildings within the Conservation Area which relates to the Victorian era.
- 4.5.2. However, the proposed school building would be located outside of the Conservation Area boundary by approximately 2 metres. Although the proposed building would lie outside of the Conservation Area it would have an impact upon the setting of the Conservation Area due to its close proximity.
- 4.5.3. LDP Policy MD8 - Historic Environment states development proposals “within conservation areas, development proposals must preserve or enhance the character or appearance of the area” (LDP, p.110, 2017). Approximately 0.27ha of the front end of the site lies within the conservation area which includes the existing school building. The existing building is a prefabricated single storey structure and will be demolished following the completion of the proposed replacement school. UPVc panels are the predominant material to the elevations with wooden style cladding elements breaking up the elevations. There is an element of stone cladding to a section of the eastern elevation of the building. The St Nicholas CAAMP does not identify the existing building as having special architectural merit or contributing to the overall character of the Conservation Area. Although, the school building does not have architectural merit the presence of a school within St Nicholas has a historic value. A school has existed within the village since the 1870s being originally built to accommodate the growing population of the village. The proposed development would retain a school use within the village which is considered to appropriately reflect the historic and current needs of the village.

- 4.5.4. The proposed frontage of the site will include an ornamental hedgerow to the street frontage, which is considered to help maintain a rural character to the street frontage. Furthermore, the proposal does include removing 4 trees within the Conservation Area to accommodate the development. However, these trees will be replaced by mature planting at a 2:1 ratio to mitigate the loss of the existing trees and help improve the visual amenity of the site in accordance with the Council's Tree, Woodlands, Hedgerows and Development SPG.
- 4.5.5. The proposed building would be set outside of the Conservation Area and would be single storey in nature with a 1½ storey element to the southern elevation measuring approximately 9m high. This taller element relates to a smaller section of the proposed building to accommodate the school hall. The lower height of the majority of the building and the fact that it will be set back from the conservation area ensures the proposal does not detract from the character of the Conservation Area. Furthermore, the colour palette of the external materials would be softer than using white UPVc and is considered to be more rural in character appropriately reflecting the surrounding context which has a mixture of external finishes including stone cladding, roughcast render and smooth render. The use of darker roofing materials would help the roof blend in with surrounding residential development which has predominantly traditional slate roof coverings.
- 4.5.6. The area of the development site where the existing building is located will be used as a staff parking area and allow for parent pick up and drop off. It is considered this would not detract from the Conservation Area as the land would remain open in nature and help in removing parked vehicles accessing the school which currently park within the village. The CAAMP identifies an area of significant views which can be seen from the adjacent public footpath which runs along the eastern boundary of the site. Although the proposed building would interrupt the view to the west from the footpath, this would relate to the lower section of the proposed building and the retained school field to the rear which ensures the majority of the views to the west would be maintained from the public footpath.
- 4.5.7. Consequently, the proposed development is considered to comply with national policy, LDP Policy MD8 - Historic Environment and guidance contained within the St Nicholas CAAMP and the Conservation Areas in the Rural Vale SPG.

4.6. A SUMMARY OF THE OPTIONS CONSIDERED FOR THE PURPOSE OF ACHIEVING THE OBJECTIVE REFERRED TO IN POINT (B) AND THE REASONS WHY DEMOLITION IS PREFERRED.

- 4.6.1. One alternative option considered was to upgrade the existing school building, rather than demolish it as proposed. This would require a substantial extension to the existing building to accommodate the increased need for pupil spaces at the school. Additionally, the existing building would need to be retrofitted with better materials to improve the buildings sustainability which is one of the key objectives of the replacement school.

- 4.6.2. The extension and retrofitting of materials would represent a significant cost and it is considered that it would detract from the character of the conservation area. However, the proposed development would be excluded from the conservation area and more appropriate soft landscaping would be introduced to reduce the impact of the proposed school on the character of the Conservation Area.
- 4.6.3. Another option considered was purchasing land outside of the conservation area to develop the school. However, this would be located outside of the settlement boundary of St Nicholas. It is considered important to maintain a school within the village to reflect the historic growth of the settlement. Furthermore, it was considered there would be other issues regarding national and local policy compliance due to the sites location outside of the settlement and the provision of LDP Policy MG6 - Provision of Education Facilities which states education proposal should be located to allocated sites and “existing schools will be extended or improved to meet demand for school places during the plan period” (LDP, p.65, 2017).
- 4.6.4. Therefore, these proposals were dismissed as it was considered to be more cost-effective to demolish the existing substandard building and provide a new replacement facility given the benefits of a new building and its sustainable location within the settlement.

5. CONCLUSION

- 5.1. The proposed development is compatible with all aspects of the relevant legislation and planning policy, including the Planning (Listed Buildings and Conservation Areas) Act 1990, Planning Policy Wales, and Technical Advice Note 24: The Historic Environment, the Vale of Glamorgan Council's Adopted Local Development Plan and relevant SPG. As such, the proposal is considered to be acceptable, and it will continue to preserve and enhance the character of the conservation area.

- 5.2. Taking all of the above into consideration, it is contended that there are no material considerations of sufficient merit or weight to resist the accompanying planning application or conservation area consent application for the proposed works, and therefore the proposed demolition of the school should be approved.