



1st March 2022

Dear Members of the Petitions Committee,

RE: Petition P-05-949. Save Cowbridge Old Girls' School from Demolition

On behalf of everyone who signed the above petition and who supports our campaign, I wish to thank you for giving it your consideration and for putting it forward for a debate. We welcomed the cross-party support received during the debate and that it also highlighted the wider issue regarding the loss of historic buildings across Wales.

The response from the Deputy Minister for Arts and Sports was very disappointing although not unexpected given the resistance to scrutiny that has been evident throughout this case. More concerning was the number of inaccurate and misleading statements that were included in the Deputy Minister's response, specifically surrounding the listing criteria. In her statement she acknowledged that the school has historic interest which, according to the legislation, would justify granting it listed status. However, she incorrectly stated that to be a candidate for listing a building must have historic and architectural merit. She based her justification for not listing the school or allowing further review of the case on this false statement. More in depth analysis of the statement is enclosed.

We now urge you to seek clarification from the Deputy Minister regarding these statements in view of the fact that these were provided as a reason to not accept the requests of the petitioner and supporting Members of the Senedd to seek an independent peer review. Indeed, the comments provide further evidence as to why an urgent review of the way in which Cadw operates and advises Welsh Government is needed.

Yours sincerely,

Sara Pedersen
SAVE Cowbridge Girls' School Campaign Group

Response to the statement made by Dawn Bowden, Deputy minister for Arts and Sports at the end of the “Debate on petition P-05-949 Save Cowbridge Intermediate School for Girls from demolition”

Dr Tudur Davies BA MA PhD FSA

Outlined below are specific statements made by the Deputy Minister during the debate on Petition P-05-949 are either contested by research undertaken by Scourfield (2019) and Davies and Scourfield (2020) or are demonstrably incorrect. In light of these issues, a review of the Deputy Minister’s listing decision is requested. The sections in question from the Deputy Minister’s statement are as follows:

Statement No. 1:

“So, **I do fully acknowledge the historical interest of the school**, and I agree it will be a huge shame to see it demolished. However, **to be listed by the Welsh Government, a building must demonstrate architectural and historic qualities of national significance**. So, **it has to meet both those criteria**, as set out in that national listing criteria.”: 310

I would challenge the statement that the school does not have architectural qualities of national significance, as argued by Scourfield 2019 and Davies and Scourfield 2020. These two reports specifically note architectural elements that are possibly unique to the school at Cowbridge and that features belonging to the original 1895-6 school survive to a very high degree. However, I do welcome the deputy minister’s acknowledgement of the historic interest of the school. Nevertheless, I must point out that the deputy minister is incorrect about the need to demonstrate both architectural **and** historic qualities of national significance. The Planning (Listed Building and Conservation Areas) Act of 1990 and the Historic Environment Wales Act 2016 state ‘architectural **or** historic interest’ when discussing criteria for listing rather than ‘**and**’. By publicly acknowledging the historic interest of the school, the minister has by implication acknowledged that the school does in fact meet the criteria for listing. I would therefore invite the Deputy Minister to re-consider the government’s position on the listing of this building given her acknowledgement of the building’s historic significance.

I would also note that in his justification of the listing of listing Grove Park School in Wrexham in 2016, the RT Honourable Mark Drakeford made specific reference to its historic interest in the education of women and that “the history of women’s education in Wales – as in women’s experience more generally – is under-represented”. Given the pivotal role the School in Cowbridge played in the education of women, especially in science, it surely deserves similar recognition through listing.

Statement No. 2:

“**This building has effectively been assessed against the listing criteria three times**: first, as part of the national community listing resurvey of Cowbridge **in 1999**, then by Cadw historic buildings specialists in response to a request **in 2018**, and again by an independent expert **in 2020**. The later assessments included the careful scrutiny of all the evidence provided by the campaigners. The conclusion was that, unfortunately, the criteria are not met in this instance.”: 310

Our campaign group has repeatedly asked Cadw to provide evidence for the listing decision of 1999 as part of the listing resurvey of Cowbridge. Scourfield’s report on the merits of the school for listing suggests that it could in fact have been missed out due to the architectural richness of Cowbridge (Scourfield 2019: 21). Indeed in 1999, the school would have been in active use, and its position on

the outskirts of the town, away from the town's conservation area and other prominent listed building may have meant that it was not considered alongside other buildings in the town. Nevertheless, as also noted by Scourfield, our appreciation of buildings like Cowbridge School is 'likely to be greater and better-informed than at the time of the original survey, two decades ago' (Scourfield 2019: 21).

It should also be noted that the research undertaken by Scourfield on the architectural and historic significance of the school was undertaken after the 2018 assessment undertaken by Cadw, which was therefore undertaken without the full range of facts currently known about the school. Whilst the 'independent' assessment made in 2020 did indeed make use of information provided in the Scourfield (2019) report, several of the conclusions made are highly subjective, unsubstantiated and contradicts the views of more than 20 relevant specialists who support the listing decision (see <https://oldgirlsschool.wales/experts/>). The majority of these 20 specialists have previously written to the former Deputy Minister for Culture, Sport and Tourism, Lord Dafydd Elis-Thomas, but their views were dismissed as a 'protest letter' rather than expert opinion that should have been considered as evidence of the school's significance.

There are also significant concerns relating to the independent nature of Richard Hayman's report due to undeclared conflicts of interest. An immediate relation of Richard Hayman works as an architect and has a number of historic buildings within his portfolio. At the time of Richard Hayman's assessment, this member of the family was working in partnership with the proposed developer of the School, Hafod Housing Association on another scheme (as confirmed in a social media post) Whilst Richard Hayman's integrity is not questioned, serious concerns are raised about the procurement process if this significant conflict of interest was not noted. In addition, due to the long-standing relationship of working alongside the Cadw inspectors involved in this case, there is concern over true impartiality.

A further concern is the lack of transparency in the listing decision. An internal report of the listing decision was undertaken by Cadw in response to supplemental research on the school undertaken by Davies and Scourfield (2020) but was purposely withheld from the authors as it would "have the effect of inviting further unnecessary debate" (Cadw memo DET/00488/20).

It is, therefore, contested that a truly independent assessment of the listing decision has taken place that considers the full range of evidence pertinent to the school. The behaviour exhibited by of Cadw as part of this listing process has displayed a distinct lack of transparency and accountability in their decision-making process. This also highlights the need for the establishment of an advisory panel for the Welsh Historic Environment as stipulated by the Historic Environment (Wales) Bill of 2016 to advise the Welsh Government on the implementation of policy, which has yet to be undertaken. It is for the reasons listed above why a truly independent review of the listing decision has been sought to ensure full transparency and accountability relating to the listing decision for the school.

Statement No.3:

"This building no longer survives as built, its form has been compromised by large-scale alterations in 1909 and more recently, as recently as a few years ago, with the insertion of UPVC windows.": 313

The extent to which the building has been compromised by the 1909 extension is highly subjective and indeed contested by Davies and Scourfield (2020) and by 20 senior professionals and academics who have written to the deputy minister's predecessor, Lord Dafydd Elis Thomas. The addition of UPVC windows in the school is largely a cosmetic issue that can be easily reversed, and indeed several buildings have been listed with UPVC windows, "often having 'modern glazing' in their description" (Davies & Scourfield 2020: 17) – as such this should not be taken into consideration as serious alteration to the building as part of the listing decision.