

From: (ESNR-Tourism, Heritage & Sport-Cadw)
Sent: 18 March 2016 10:10
To: Coward, Matthew (ESNR-Tourism, Heritage & Sport-Cadw)
Cc: Clark, Kate (ESNR-Tourism, Heritage & Sport-Cadw); Alfrey, Judith (ESNR-Tourism, Heritage & Sport-Cadw); Osmond, Julie (ESNR-Tourism, Heritage & Sport-Cadw)
Subject: FW: Grove Park School - Proposed Listing Decision

Matthew,

We need to consider how we are going to approach this.

Meanwhile we need to consider what line we should take in relation to ongoing enquiries.

Kate Clark and I suggest something like 'Because of the challenges in considering the listing of these types of buildings dating to the interwar years, the Deputy Minister for C,S and T has asked for an independent peer review of the listing assessment of Grove Park School. This will also help inform future assessments of this kind'.

Obviously we will need to ask the DM to clear this line.

Gwilym

From: PS Deputy Minister for Culture, Sport & Tourism
Sent: 17 March 2016 17:47
To: Coward, Matthew (ESNR-Tourism, Heritage & Sport-Cadw)
Cc: PS First Minister; PS Minister for Economy Science & Transport; Price, James (ESNR-Economy Skills and Natural Resources); Antoniazzi, Manon (ESNR-Tourism, Heritage & Sport, Tourism & Marketing); (Special Adviser); Clark, Kate (ESNR-Tourism, Heritage & Sport-Cadw); Hughes, Gwilym (ESNR-Tourism, Heritage & Sport-Cadw); CADW Ministerials; Osmond, Julie (ESNR-Tourism, Heritage & Sport-Cadw)
Subject: Re: Grove Park School - Proposed Listing Decision

Matthew,

The DM notes that no formal decision should be reached until a peer review has been completed.

Thanks

From: Coward, Matthew (ESNR-Tourism, Heritage & Sport-Cadw)
Sent: Tuesday, March 15, 2016 01:54 PM
To: PS Deputy Minister for Culture, Sport & Tourism
Cc: PS First Minister; PS Minister for Economy Science & Transport; Price, James (ESNR-Economy Skills and Natural Resources); Antoniazzi, Manon (ESNR-Tourism, Heritage & Sport, Tourism & Marketing); Bold, Andrew (Special Adviser); Clark, Kate (ESNR-Tourism, Heritage & Sport-Cadw); Hughes, Gwilym (ESNR-Tourism, Heritage & Sport-Cadw); CADW Ministerials; Osmond, Julie (ESNR-Tourism, Heritage & Sport-Cadw)
Subject: Grove Park School - Proposed Listing Decision

<<ObjRef.obr>>

Dear Kate,

Issue

1. I am emailing to ask that the Deputy Minister notes the Welsh Government's assessment of the Former Grove Park School, Acton, Wrexham, for listing, and its conclusion that the building does not meet the criteria to be listed as one of special architectural or historic interest.

Timing

2. Urgent. Officials have been advised by Wrexham County Borough Council that it will decide on 23 March whether to proceed with demolition in advance of any decision on the possible listing.

Recommendation

3. That you note the background and advice contained in paragraphs 4-14 prior to officials issuing a formal decision declining to list the Former Grove Park School.

Background

4. The building has been previously assessed and rejected for listing on two separate occasions; in 1994 when Wrexham was surveyed for potential listed buildings and then again in 2007/8 following a spot-listing request. On both occasions the building was not judged to be of sufficient quality and character to be listed at the national level. There would need to be sufficient new evidence for these decisions to be overturned.

5. By law, under the Planning (Listed Buildings and Conservation Areas) Act 1990, a listed building must be of special architectural or historic interest. The legislation is supported by guidance which explains the criteria against which candidate buildings will be assessed. The emphasis in these criteria is on national significance, though it explains that this cannot be defined precisely. Decisions to list must therefore confine themselves to the criteria and any other factors are immaterial to the decision making process, otherwise the decision could be the subject of a successful legal challenge.

6. The listing criteria explain that the principal factors to be taken into account are:

- Architectural interest – the lists are meant to include buildings which are of importance to the nation for the interest of their architectural design, decoration and craftsmanship; also important examples of particular building types and techniques (e.g. buildings displaying technological innovation or virtuosity) and significant plan forms;
- Historic interest – this includes buildings which illustrate important aspects of the nation's social, economic, cultural or military history;
- Close historical association with people or events of importance to Wales; and

- Group value – especially where buildings contribute an important architectural or historic unity or are fine examples of planning (e.g. squares, terraces or model villages).

Age and rarity are also relevant, particularly where buildings are proposed for listing on the strength of their historic interest. The approach adopted for buildings after 1840, because of the greatly increased number of buildings constructed and the much larger numbers that have survived, is to be particularly selective, identifying the best examples of particular building types and only listing those buildings that are of definite quality and character. The approach adopted for twentieth century listing is to identify key examples for each of a range of building types - industrial, educational, hospitals, etc - and to treat these examples as broadly defining a standard against which to judge proposals for additions to the lists.

7. The Welsh Ministers have a duty to list any building that meets the criteria for special architectural or historic interest. In practice, buildings are added to the statutory list through a process known as spot-listing and usually following a request from a local planning authority, an amenity society or other bodies or individuals. The Welsh Government's Historic Environment Service (Cadw) carries out an assessment of all such requests.

8. Under the Government of Wales Act 2006, your officials have authority, generally, to exercise functions on behalf of and in the name of the Welsh Ministers. This is referred to as the Carltona Principle. For listing, while the legislative power to list buildings of special architectural or historic interest is vested in the Welsh Ministers, the actual decision can be taken by officials on your behalf. However, expectation remains that officials will continue to refer matters to the Minister to decide if they are satisfied that they are novel or contentious, politically sensitive, or likely to attract significant media attention. This principle is in line with well-established civil service practice and reflects the fact that Ministers are accountable to the Assembly for decisions taken by officials in their name.

9. In this instance, the Welsh Government's Historic Environment Service (Cadw) received a request to urgently consider the Former Grove Park School for listing on 25 February 2016. The request was made by Mr Roland George of Archlectic Architectural Services, on behalf of The Grove Park Preservation Society, the 'Save Our Heritage' campaign, and concerned residents of Wrexham, and was accompanied by a detailed submission setting out the historic and architectural interest of the site. A copy of the listing request is at doc 1.

10. The building is owned by Wrexham County Borough Council. Public interest in the site has been sparked following the lack of public consultation prior to its Council's Executive Board decision on 12 January 2016 to demolish and clear the site in order to provide land for future educational needs. The site is the subject to a legal covenant which stipulates that the land must be used for educational purposes. We understand that the Council will decide on 23 March whether to proceed with demolition in advance of any decision on the possible listing.

11. Cadw undertook a site visit on 2 March 2016 to evaluate the architectural interest of the building and has conducted additional research to establish the historic interest of the site.

Advice

12. The assessment at Doc 2 considers both the historical and architectural interest of the building. This is followed by an assessment of its significance against the listing criteria set out in paragraph 6 above. This makes it clear that the building does have some historical and architectural interest. In historical terms, it represents a period in the educational history of the area arising from the expansion of secondary education during the first half of the twentieth century. In architectural terms, it is an example of an inter-war school with some interesting features including an impressive internal staircase and some attractive external brickwork. As such, it could be considered an important building at a local level, forming a very distinctive feature of the Wrexham townscape and community.

13. However, at a national level it is questionable whether it meets the threshold for listing as a building of special architectural or historic interest. In order to achieve this it has to be judged against other buildings of the same type and a consideration needs to be made as to whether it is one of the best examples. In this regard Grove Park is not exceptional. Rather, it is typical for the period and it is what would be expected in terms of construction, layout and fittings. It is not particularly innovative in its design or planning and better examples of such schools have been identified elsewhere and indeed have been listed.

14. It is open to local planning authorities to draw up lists of locally important buildings, and to formulate policies for their protection through development control procedures. Wrexham County Borough Council has chosen not to prepare such a local list.

Press and Publicity Arrangements

15. The recent decision by Wrexham County Borough Council to demolish the building has attracted some media interest and officials recently provided a line to Welsh Government Press Office following a query from the Wrexham Leader. We confirmed that we are urgently considering a listing request for the Former Grove Park Girls Grammar School. The First Minister also visited the site on 15 February with Lesley Griffiths AM and both were photographed outside the building alongside a banner which reads "Save Grove Park" (attached link refers) <http://www.soh.wales/>

16. The Welsh Ministers and officials of the Welsh Government should not comment on the proposed demolition of the building and the development of the site as they could be seen to prejudice or prejudge the planning process.

Regards

Matthew

Matthew Coward

Uwch-Rheolydd Cynllunio Treftadaeth a Dynodiadau / Senior Heritage Planning and Designations Manager.

Gwasanaeth Amgylchedd Hanesyddol (Cadw) / Historic Environment Service (Cadw)

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Cofrestrwch ar gyfer ein cylchlythyr misol i gael y wybodaeth ddiweddaraf am newyddion, digwyddiadau a chynigion arbennig Cadw <http://bit.ly/NhfxHW>

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