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Executive Director – Place & Economy (Reshaping)  
**Lee Robinson**

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LR/ SME  
26 July 2016  
Lee Robinson

Dear Ms Raffour

**Re: Proposal to list the former Grove Park School, Acton, Wrexham**

1. I refer to your letter dated 6 June 2016, addressed to Dr Helen Paterson, Chief Executive of Wrexham County Borough Council (“**the Council**”), in which you sought the Council’s views on the Welsh Government’s proposal to list the former Grove Park School building in Acton, Wrexham (“**the Building**”) pursuant to the Town and Country Planning (Listed Building and Conservation Areas) Act 1990. This is the Council’s detailed response to your request.
2. In summary, the Council **strongly resists** the proposed listing as being contrary to the weight of expert opinion, including the view expressed repeatedly by Cadw, the Welsh Government’s own adviser on the historic environment, that the listing of the Building is not justified. The Council is not satisfied that the Welsh Government has properly taken account of Cadw’s detailed advice in the justification for the proposed listing offered in the “draft description” appended to your letter dated 6 June 2016. The draft description is said to have been prepared by “a Historic Building Inspector from Cadw” but, rather oddly, the views attributed to that Inspector are at odds with the views expressed previously by Cadw’s Head of Regeneration and Conservation, Ms Judith Alfrey. This apparent *volte-face* on the part of Cadw is unexplained and unconvincing. Moreover, the proposed listing is now further undermined by (i) a peer review of Ms Alfrey’s assessment, commissioned by the Welsh Government; and (ii) a fresh expert

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assessment commissioned by the Council, both of which conclude without difficulty that the Building does not meet any of the criteria for statutory listing. I expand on these arguments below.

## Relevant guidance

3. The Welsh Government will be aware that the relevant guidance when considering whether a building should be placed on the statutory list is still set out in Annex C of Welsh Office Circular 61/96, *'Planning and the Historic Environment: Historic Buildings and Conservation Areas'* ("**the Circular**"). Paragraphs 1 and 2 of Annex C state, so far as relevant (*emphasis added*):

"1. The following are the main criteria which the Secretary of State applies in deciding which buildings to include in the statutory lists:

- architectural interest: the lists are meant to include all 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. building 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 associations with people or events of importance to Wales;
- 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).

2. Age and rarity are relevant, particularly where buildings are proposed for listing on the strength of their historic interest. [...] After about 1840, because of the greatly increased number of buildings erected and the much larger numbers that have survived, greater selection is necessary to identify the best examples of particular building types, and only buildings of definite quality and character are listed. [...] *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.*"

## Background

4. The Welsh Government will be aware that a proposal to grant statutory protection to the Building as one of special architectural or historic interest was first considered in 1994 when Cadw resurveyed the historic environment of the area in general. At the time, Cadw concluded that the Building did not warrant statutory protection.
5. The Building was used as a school until 2003. In December 2007, Ms Elaine Thomas, a Wrexham resident, made a fresh request to Cadw to consider 'spot-listing' the Building. By letter to Ms Thomas dated 24 January 2008 (erroneously typed as 24 January 2007 in the original), Cadw referred to the resurvey done in 1994 but stated that one of its inspectors had recently visited the Building again following her request. That inspector reaffirmed Cadw's previous assessment that the Building ought not to be listed. Although the inspector considered it to be "pleasantly designed", he concluded that "architecturally it is not especially remarkable". It was not, therefore, one of the "best examples" of its kind, applying the guidance in Annex C of the Circular for buildings erected after 1840.
6. Against this background, the Council resolved to demolish the school on 12 January 2016. This led to yet another attempt by Ms Thomas and a local architect, Mr Roland George, to have the Building listed. On 2 March 2016, a Cadw inspector visited the Building again. Cadw's Head of Regeneration and Conservation, Ms Judith Alfrey, then wrote a detailed "Listing reassessment" on 15 March 2016 in which she concluded, once more, that the listing of the Building was not warranted. At the end of her report, Ms Alfrey came to these conclusions (*emphasis added*):

### "Significance

The published criteria for the selection of listed buildings set out an approach for twentieth century listing which is to identify the key examples for each of a range of building types and to treat them as broadly defining a standard against which to judge proposals for additions to the list. The bench-mark for post-war schools is set by a key group of schools in the former county of Glamorgan, designed by the county architect between 1922 and 1932, D. Pugh Jones. Schools in this group conform to the principles of planning and layout which dominated the period, but they also exhibit considerable stylistic flair and sophistication, making dramatic use of revived architectural styles (Georgian and Baroque).

Grove Park School shares similar conventions of planning, and is a large and ambitious building, *but it lacks the stylistic flair of the examples of inter-war schools that have*

*already been listed (see Annex). Although there are some elements of Art Deco, particularly in the surviving interior fittings, and some use of decorative brickwork externally, essentially it is a much more utilitarian building than the comparable listed examples. It is therefore not an exceptional example of an inter-war school, and does not appear to meet the rigorous test required for listing twentieth century buildings.*

In conclusion, Grove Park School is representative of a period in school building 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 is it *[sic]* could be considered an important building at a local level, forming a very distinctive feature of the Wrexham townscape and community.

*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 would need to be one of the best examples, when judged against other examples of its type. In this regard Grove Park is typical of its period rather than exceptional in terms of its construction, layout and finish. No new evidence has been forthcoming that is sufficient to overturn the original listing decision regarding Grove School. Despite its interest at a local level, 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.”*

7. Despite this clear advice from the Welsh Government’s own statutory adviser on the historic environment, an email was sent on behalf of the Deputy Minister for Culture, Sport and Tourism to the Council on 23 March 2016, indicating that he was “minded to list” the Building “subject to an independent peer review of the listing assessment of the school”. The day before then, the Deputy Minister had recorded the following reasons for taking this unexpected course:

“It is in my view *[sic]* that additional evidence of the buildings’ historic importance has been provided in recent weeks, but not necessarily in a way that we have acknowledged. The considerable interest in the building and the debate over its future is, I believe, a significant recent chapter in the history of The Groves. In the years to come, the fate of the building will doubt less *[sic]* be examined and therefore its historic significance is being amplified with every day that passes.

In my view, the historic significance of the building is greater today than it was year ago *[sic]* and is still growing.”

8. Also on 22 March 2016, the Welsh Government appointed the Director of Listing at Historic England, Dr Roger Bowdler, to undertake the peer review mentioned by the

Deputy Minister. Mr George gave Dr Bowdler, via Ms Alfrey, further evidence, including *inter alia* the details of listed schools outside Wales which were said to be comparable to the former Grove Park School. When forwarding this evidence to Dr Bowdler, Ms Alfrey made clear that this further information did not change her view that the Building should not be listed.

9. In a report dated 29 April 2016, Dr Bowdler stated that he was content that Ms Alfrey had applied the relevant tests in Circular 61/96 “correctly” in her assessment. His only suggestion was that “it would have helped to have identified comparable schools of this period which have been listed, so as to show where the bar for listing has been set”. On the issue of “Comparable Listed Schools in England”, Dr Bowdler observed that “innovation in planning and design have long been the key considerations in selecting schools for listing”. This means, he said, “that the traditional Neo-Georgian designs such as Grove Park School are often rejected for listing”. Whilst they were some listed schools of Neo-Georgian design, and Dr Bowdler gave specific examples in his report, he commented that “[e]ach [of those] possesses an architectural quality that is readily sensed”. Dr Bowdler did not believe that “any of these listing decisions strengthen the case for the listing of Grove Park School”.
10. On behalf of Cadw, Ms Alfrey responded to Dr Bowdler’s report in a further report of her own dated 16 May 2016. This was the fourth time that Cadw considered in detail whether the Building should be listed. Ms Alfrey concluded that none of the further evidence warranted a change of approach by Cadw. To the contrary, Ms Alfrey concluded that the findings of the peer review arranged by the Welsh Government served only to reinforce the view held consistently by Cadw that the Building did not merit a statutory listing. The Council was struck again by the level of care taken by Ms Alfrey when considering all the further evidence (*emphasis added*):

“[...] The original assessment and the response to this additional information was then subjected to a peer review, carried out by Roger Bowdler, Director of Listing for Historic England. The findings of the peer review have confirmed that the criteria have been correctly applied, noting that innovation in planning and design has been a key consideration in the selection of schools for listing for some time now. It also finds no fault with the way in which the case was handled, and whilst identifying comparable schools in England that have been listed, found that they all exhibit a greater degree of architectural quality.

Since then, Cadw has received a further submission about the design of the school from Roland George. This explains that the original designs for the school were drawn up in

1914 by Walter Douglas Wiles, who was county architect for Denbighshire from 1905, but that the work was implemented by his son and successor as county architect, Gilbert Douglas Wiles. Much of this information had already been made available in a letter from Marcus Jones in February. The latest submission includes detailed biographical information about both architects, which adds local colour and a personal dimension to the history of the building, but which doesn't bear directly on special architectural and historic interest in the national context. [...]

In a further submission, Marcus Jones has challenged the benchmarking of Grove Park against a group of schools in the former county of Glamorgan, both stylistically, and on the grounds that these examples are all in South Wales. He claims that when built, the building was stylistically modern and very much of its time. Previous evidence has suggested that the original designs may have been drawn up some twenty years prior to its construction, and although the building contains some modern elements, it is essentially neo-classical in inspiration rather than modern (Gilbert Wiles' designs for Ysgol Brynhyfryd, Ruthin are by contract decisively modern). In Cadw's view it is appropriate to assess it against the benchmark of the Glamorgan schools, since like them, its stylistic references are based on a classical architectural language. On the geographical point, listing is concerned with the identification of buildings of special architectural or historic interest in a national context, and the benchmarking required for twentieth century listing identifies best examples of particular building types, irrespective of location or distribution. The point raised by Mr Jones may reinforce the value of Grove Park in a local context, but has no bearing on the assessment for listing.

*In conclusion, no new evidence has been presented that significantly challenges the original assessment that the building does not meet the criteria for listing; the findings of the peer review give confidence that the assessment process has been sound. Whilst the building is not of special architectural or historic interest such as to warrant inclusion on the statutory list, it is of undoubted local significance, and should Wrexham Council be minded to set up a list of historic assets of special local interest, it would be open to the Council to consider the value of Grove Park in that context."*

11. Copies of Dr Bowdler's report and Ms Alfrey's latest report were sent to the Deputy Minister (who was appointed to the new post of Cabinet Secretary for Economy and Infrastructure following the Assembly elections in May 2016, with continuing responsibility for the historic environment of Wales). The Cabinet Secretary gave a very summary response to this latest analysis, without any detailed engagement with the reports or the guidance in the Circular. It was simply stated on his behalf (*emphasis added*):

“... taking account of the additional information attached the Minister has considered and *on that basis* is minded to list the Groves Park School.”

12. The words “on that basis” made no sense given that the additional information included the two detailed reports by Dr Bowdler and Ms Alfrey that advised *against* a statutory listing.

13. On 6 June 2016, you (Ms Raffour) wrote to the Council’s Chief Executive to confirm the Welsh Government’s intention to proceed with listing the Building. You enclosed the “draft description” prepared by an unidentified “Historic Building Inspector from Cadw” and asked for the Council’s comments. Incongruously, the justification given in the draft description for listing the Building was entirely at odds with the view previously expressed by Ms Alfrey on behalf of Cadw:

“Listed for its special architectural interest on the grounds of its quality and character as a key example of an inter-war girl’s *[sic]* grammar school in the neo-classical tradition (in a 1930s interpretation) which survives largely intact, and in view of its aesthetic merit as an ambitious building, which demonstrates stylistic flair in features such as the quality of the double-sweep stair and the external brickwork.”

### **A further independent report**

14. Presented with an apparent *volte-face* on the part of Cadw, the Council immediately took steps to commission its own advice from an expert heritage consultant. Mr Rob Scourfield, a former inspector of historic buildings and author of the Pevsner *Buildings of Wales* volumes with degrees in architectural history, was duly appointed to prepare a report. Mr Scourfield inspected the Building in person on 4 July 2016 and also carried out research at Wrexham Library, Wrexham Museum and the County Archives. He presented his detailed report, ‘*Former Grove Park School, Wrexham – An Architectural and Historic Evaluation*’, to the Council on 11 July 2016. Mr Scourfield came to the clear view, based on a comparative analysis of other schools of neo-Georgian design, that the Building does not meet any of the criteria for statutory listing set out in Annex C of the Circular. Mr Scourfield therefore agreed with the expert opinions of Ms Alfrey and Dr Bowdler. A copy of Mr Scourfield’s report is sent with this letter and the Cabinet Secretary is asked to consider it in full. The Council highlights the following passages in the report:

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Byddwn yn ymateb i unrhyw ohebiaeth yn Gymraeg ac ni fydd hyn yn arwain at unrhyw oedi.*

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“4.1 Grove Park School is an example of many of the neo-Georgian schools built in inter-war Wales and England. [...]

4.2 The plan is very typical of school planning of the period, arranged on a courtyard plan, with central hall, and gym behind with link corridors. [...]

4.4 Many county architects during the inter-war years adopted neo-Georgian for educational buildings. D. Pugh Jones (Glamorgan) designed Tonyrefail (fig. 9) School in 1933. The elevations and double-courtyard plan are similar to Grove Park, the former [*i.e. the elevations*] far better detailed, the latter [*i.e. the double-courtyard*] retaining better and more original detail – meriting its Grade II listing. [...]

Many other examples may be mentioned. John Bain designed Newbridge (1930 – fig. 10) and Bassaleg (1935) schools in Monmouthshire, both neo-Georgian with courtyard plans. Ysgol Tryfan, Bangor (1937, W. Lloyd Jones – fig. 11) is in a similar vein, rather more similar to Wrexham. *None are listed – and even within this short list, the stripped and economical facades of Grove Park and Bangor are dull, when compared to schools like Newbridge.* [...]

4.6 *It is clear than [sic] even from a cursory examination of comparable schools across Wales and England, than [sic] Grove Park School is not of particularly high quality and falls below the line of several unlisted schools in terms of architectural quality in respect of both detail and plan.* [...]

5.1 [...] The quality of the brick itself [at Grove Park School] is attractive, but the use of rustic brick, as opposed to engineering (or locally, Ruabon brick) is influenced by the Arts and Crafts ethic, and commonly used in public buildings of the period. A ghost of neo-Baroque is seen in the emphatic architraves of the entrance bay, which is detailed in artificial stone, not stone, as referred to within the draft listing (noted as such on the plans of 1937). It is unclear as to whether the construction is of solid or cavity brick – by this date, either is conventional. *It is therefore concluded that the brickwork, whilst attractive, is not particularly innovative for the period. That this should form part of the ‘stylistic flair’ of the building, as referred to within the draft list description is perhaps an overstatement.*

5.2 The careful attention to detail is carried on within the building – the doors, wainscots etc are all decently done. They are, however, conventional in detail and apart from some simple Deco detail in the staircase, and proscenium and balcony front of the hall, the detail is all plain. [...]

5.4 In terms of type, again, Grove Park School is conventional. Separate schools for girls and boys within the same town were commonplace where land was in short supply and buildings typically overcrowded. [...]

5.6 The draft listing (and Mr George) both refer to the main staircase, which is the key feature of the interior. The double-flight staircase is of impressive proportions, spanning the entry to the main hall. It is constructed of reinforced concrete, finished in terrazzo. The balustrades are of cast iron, with scrolled newels and timber handrails. There is a Deco character to the geometric pattern of the balustrades (fig. 18), but rather muted when compared to the 'streamlined' designs of the period. [...] There is nothing Deco about the two large roof-lighting the lanterns – their character is standard Victorian/Edwardian. *That the staircase is part of the 'stylistic flair' as mentioned in the draft listing is debatable.* [...]

7.1 The draft list description characterises the school as a 'key example of an interwar girls' school. The first headmistress, Miss A Gower Jones expressed pride that Grove Park was the only grammar school built in Wales between the wars. This is of passing interest, but has no innovative or pioneering context with regards to the building, or to the social/cultural history of Wales.

7.2 The reference to air raid provision within the draft listing and Mr George's submission is addressed by Dr Bowdler, who notes that 'factories and public buildings increasingly included air raid shelters from the passing of the 1937 Air Raid Precaution Act'. [...] The works [at Grove Park] were limited to the protection of doors and windows and the use of timber props for the existing concrete ceilings. Being temporary works, they have long since been removed and this aspect of military history is of no more than local interest.

15. Mr Scourfield then concluded as follows:

"10.1 Grove Park School is a pleasant and well-built structure, located within an attractive area of Wrexham. It is, however, typical of many school built across Wales and England at the time and forms a late example of its type, prior to the revolution in school design after WWII. There are many comparable examples which are not listed, Cadw and English Heritage having selected only those displaying innovation or with a distinct architectural character. Its historic interest is of even less consequence, its air raid provision being typical of the period and temporary in nature. No historical associations are known and there is no demonstrable group value.

10.2 It is therefore concluded that Grove Park School does not fulfil **any** of the criteria as set out in Circular 61/96. In line with the Director of Regeneration and Conservation at Cadw and the Director of Listing at English Heritage, I agree that Grove

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Park School should not be added to the statutory list of buildings of special architectural or historic interest.”

## Conclusion

16. The Council considers that the independent expert evidence in this case advising against a statutory listing of the Building is overwhelming. It is common ground between (i) Cadw’s Head of Regeneration and Conservation, Ms Judith Alfrey; (ii) Historic England’s Director of Listing, Dr Roger Bowdler; and (iii) the author of the Pevsner *Buildings of Wales* volumes and the former historic buildings inspector, Mr Rob Scourfield, that the Building does not warrant inclusion on the statutory list. All the matters relied upon in the ‘draft description’ to justify the proposed listing have been discredited in the reports of these experts. In particular:

- (1) The Building is not, as alleged, “a key example of an inter-war girl’s *[sic]* grammar school in the neo-classical tradition”, as it has been shown that there are significantly better examples of this building type, some of which are not even listed themselves. To list the Building would therefore be inconsistent with the approach taken nationally by Cadw in Wales to ensure, in accordance with Annex C of the Circular, that only the “key examples” are listed.
- (2) The claim that the Building has “aesthetic merit as an ambitious building” is unwarranted given the relative lack of ambition shown in the design, whose “stripped and economical facades” stand in contrast to the design of listed schools from the period, such as the school at Newbridge, Monmouthshire.
- (3) The claim that the Building has “stylistic flair” by virtue of “the double-sweep stair” is overblown given that the balustrades lack the ‘streamlined’ designs of the period.
- (4) Moreover, the assertion that the brickwork gives the Building “stylistic flair” is also exaggerated given that it was “not particularly innovative for the period”.

17. The consensus of expert opinion on these matters is such as to make it impossible, rationally, for the Welsh Government to continue to rely on the ‘draft description’ to support the proposed listing. This draft description has been imputed to an unidentified ‘Historic Buildings Inspector from Cadw’, but given that it presents an assessment that is entirely at odds with that expressed consistently by Cadw’s own Head of Regeneration and Conservation throughout this case, the change in position is not credible and raises serious questions about the integrity of decision-making within Cadw. Moreover, far from

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showing a serious attempt to engage with the expert assessments provided in this case, the evidence shows a consistent failure by the Welsh Government to consider those assessments and to take due account of its own published guidance on the criteria to apply when deciding which buildings should be listed.

18. For these reasons, the Council has been advised that there are compelling grounds for seeking judicial review should the former Grove Park School be listed as currently proposed. To avoid protracted and costly court proceedings, the Council respectfully asks the Welsh Government to reconsider its position in light of this letter.

19. If I can assist further at this stage, please do not hesitate to contact me. I look forward to hearing from you.

20. For completeness, the Council's planning department has identified the recent planning history of the site and this is attached to this letter at 'Appendix A'.

Yours sincerely



Lee Robinson  
Executive Director

**Appendix A – Recent planning history of the site of the former Grove Park School, Wrexham**

P/2013/0039 – Approval of details of prior notification of demolition of former school buildings

GRANTED – 27/02/13 (These works have now been completed.)

P/2014/0042 – Submission of details to consider whether prior approval of demolition of school building is required.

GRANTED – 20/02/14

P/2014/0863 – Refurbishment of existing school building including some new build and associated external works.

GRANTED – 02/11/15

P/2014/0888 – Application for outline planning permission for the erection of a sports hall and teaching facilities and external works incorporating parking facilities – all detailed matters reserved.

GRANTED – 06/11/15