

Huw Lewis AC / AM  
Y Gweinidog Tai, Adfywio a Threftadaeth  
Minister for Housing, Regeneration and Heritage



Llywodraeth Cymru  
Welsh Government

Eich cyf/Your ref P-04-263  
Ein cyf/Our ref HL/06342/12

William Powell AM  
Chair, Petitions Committee

c/o Clerk of the Committee  
Naomi.stocks@wales.gsi.gov.uk

18 February 2013

Dear William,

In my letter to you of 22 October about the petition to list Stradey Park I undertook to send you a copy of Cadw's report scoping the options for protecting our sporting heritage and a copy is attached.

Last year, Cadw undertook a wide-ranging engagement exercise with heritage specialists, stakeholders and the general public to inform the development of my Historic Environment Strategy and the Heritage Bill. The improved protection of sporting heritage was not highlighted as a particular issue during this process but I have asked my officials to consider the scoping report as part of the work that they are undertaking on the Heritage Bill and associated policy and guidance.

You will have seen in the headline action plan that accompanies my Historic Environment Strategy that I am committed to developing selection guidance for the designation of historic building types and parks and gardens. Our sporting heritage will feature in this work and Cadw will also be reviewing the additional guidance that local authorities may require to accompany the Heritage Bill.

I will keep Assembly Members informed of progress with the development of the Heritage Bill and I intend to launch the White Paper consultation in the late spring of 2013.

Yours sincerely

**Huw Lewis AC / AM**  
Y Gweinidog Tai, Adfywio a Threftadaeth  
Minister for Housing, Regeneration and Heritage

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# **The Protection of Sports Heritage in Wales:**

## **A Review**

# The Protection of Sports Heritage in Wales: A Review

## Introduction

Cadw recognises that sport is an important and integral part of the heritage of Wales, which should be valued and appreciated for its special contribution to the distinctive culture of the country. Cadw is therefore reviewing the protection of sports heritage, to establish whether existing frameworks for the identification of historic interest are sufficient to capture our sporting heritage, or whether additional measures are needed. This review has been prompted by recent concern over the loss of some historic sports grounds, notably Stradey Park, Llanelli.

The systems for the protection and management of the historic environment that are currently operated by Cadw include the identification and designation or registration of historic assets of national importance through scheduling and listing, or through inclusion on the register of historic parks and gardens. All of these systems are focussed on physical, spatial sites which are capable of protection and management. Designation and registration are intended to support the protection of these assets and to ensure that change is managed appropriately. There are consent regimes in place for both scheduled ancient monuments and listed buildings. There is no consents regime for parks and gardens, but inclusion on the register is a material consideration in the planning process. Cadw provides advice to local planning authorities on planning applications affecting registered sites, with the aim of preventing damage to significant elements and features.

For the purposes of this review, a sports site is defined as an area or building specifically designed and used for sporting purposes. A site may include open space, buildings and other structural elements. Where criteria for special historic interest are met, the built elements of a site may be eligible for protection through listing; sites that comprise open spaces and/or buildings could be included within the register of parks and gardens. In some circumstances, sports sites may be included as elements of scheduled ancient monuments.



*Pontypool Park*

### **Sports Heritage and the Register of Parks and Gardens**

The Register of Parks and Gardens already offers some protection to a significant numbers of sports sites. Some sixty sports venues are included within parks and gardens on the Register. These venues range from archery lawns and tennis courts in privately owned gardens, to sports pitches and facilities in public parks, as well as substantial developments such as the Glamorgan County cricket ground and the Pontypool Rugby club. However these sites are generally not the principal reason for inclusion on the Register, and their specific interest and significance may not have been fully evaluated.

There are currently no sporting venues included on the Register for their own intrinsic merit, but as the scope of the Register includes ‘... designed grounds... and places of recreation’, sporting venues would be eligible for consideration in their own right. The selection criteria allow a consideration of sites that illustrate some particular aspect of the history of designed grounds and places of recreation, have historical associations, or group value. These criteria would readily enable sites of special interest for sports heritage to be identified.



*Handball Court, Nelson*

### **Sports Heritage and Listed Buildings**

Listing has already picked up a broad range of sports sites, though often not with large numbers in each category. The criteria for listing emphasize architectural or historic interest, historical association and group value. External appearance is a key consideration in assessing the merits of buildings for listing, but it is recognised that the special interest of a building will not always be reflected in obvious visual quality. Popular sports and public provision (municipal facilities, workmen's institutes) as well as elite pursuits are reflected in the stock of listed buildings. This range suggests that existing listing criteria are responsive to the diverse characteristics of sports buildings, though the relatively low numbers of such sites suggest that there may be scope for additional designation activity.



*Roman amphitheatre, Caerleon*

### **Sports Heritage and Scheduling**

A small number of sporting venues are protected through scheduling, either because of their intrinsic special interest (such as the Roman amphitheatres at Caerleon and Carmarthen), or by default because of their inclusion within areas scheduled for other reasons (such as Richmond Park Football ground, the home of Carmarthen Town FC that sits within a scheduled area of the Roman Town of Carmarthen, the bowling green at Welshpool motte and bailey castle, or the golf course at Llanymynech hillfort, Powys). In reality of course, their default status as scheduled monuments is seen as a significant constraint by active sports clubs wishing to expand or alter their facilities. There has been no systematic inventory of these sites.



*Taff Vale Park, Pontypridd*

## **Local Protection**

Where buildings do not meet the criteria for statutory listing, it is open to local authorities to consider their inclusion on a local list. At present, few local authorities in Wales maintain a local list, but this is under review as part of the provisions of the Heritage Bill. Some sporting venues may be included within conservation areas – areas whose character it is desirable to preserve or enhance. Where their significance to the local area is fully recognised, this offers some scope for protection as a local designation.

## **The limitations of Protection**

A review of the kinds of sporting venue that are recognised either directly or indirectly as historic assets suggests that collectively these sites provide good evidence for the history and traditions of recreation in Wales. However, there are some types of sports heritage that are under-represented – especially facilities associated with sports that attract large numbers of spectators (such as rugby, football or cricket grounds), and informal recreation grounds. There are usually good reasons for this – in the case of the former, high levels of alterations that have taken place at grounds associated with commercial sport; in the latter, insufficient tangible qualities to qualify for protection under existing criteria. Some of the values associated with sports heritage are more associative or communal rather than evidential and physical. Although Cadw's published Conservation Principles allow such values to be considered when assessing significance, physical protection might not always be the most appropriate response. Although there is no formal sign-posting to other heritage management options, support may sometimes be available for interpretation and recording activities etc. and there is clearly scope for developing such options.

## Issues

The key factors to take into account in ensuring appropriate protection for sports heritage sites are as follows:

- In many instances, sports venues are composite sites comprising an open space element as well as buildings. Statutory protection through listing only protects the built element, but where special interest criteria are met, is clearly appropriate for indoor sports, and some elements of outdoor sport.
- The Register of Parks and Gardens encompasses open space as well as buildings and structures, and is therefore able to address a fuller range of sports venues. The Register of Parks and Gardens is currently non-statutory, and inclusion on the Register does not bring with it the same level of control that applies in the case of listing. However, the Register exists to promote informed conservation, and consultation arrangements are in place aimed at limiting damage to significant features.
- Listing already identifies sports venues that are of intrinsic merit, but relatively low numbers suggest there may be scope for further designation under existing criteria. No sports sites have been included on the register of parks and gardens in their own right, although many sites are included by default. The value of these sites may not have been evaluated. This may also be the case for the smaller number of sites included within scheduled ancient monuments.
- Some types of sporting venue do not lend themselves to formal protection either because of the level of change they have already undergone or routinely require, or because of an absence of tangible physical qualities. Intangible aspects of sports heritage cannot easily be addressed through a protection regime that emphasises physical survival. There is no systematic framework for addressing the overall significance of sports heritage and identifying the most appropriate response to its different dimensions.

## Options

1. Do nothing.

The existing system includes a reasonable cross-section of types of sports site, and applies management measures which seem broadly appropriate and effective. However, it has some omissions, and many sites are protected only by default, so that their real significance has not been evaluated. There is no coherent framework setting out the value of sports heritage to Wales, and some of the values associated with the heritage of sport fall outside the scope of the current protection regime.



## 2. Use existing systems to develop a more coherent approach to sports heritage:-

- carry out an evaluation of the sports heritage already included within registered parks and gardens to ensure that its specific value is recognised, and to promote informed conservation where appropriate.

- encourage greater protection for sports heritage using existing mechanisms, including some targeted thematic work. There is a risk that greater protection would impede the continuing viability of some existing facilities. However, whilst both listing and registration presume in favour of retention, both are essentially markers in the planning system, allowing for managed change. This need not be a major issue.

## 3. Introduce a special designation for sports heritage.

It might be possible to consider new heritage designation for sports heritage sites, with specific assessment criteria for inclusion. However, the criteria for the Register of Parks and Gardens already specifically allow for the inclusion of places of recreation, and sports structures are already identified through listing, so it is difficult to see what value would be added by a separate designation.

## 4. Promote alternative approaches that would complement registration or listing, including local listing, and the use of conservation area designation.

Local listing is not currently widely used in Wales, but it is open to local authorities to establish local lists, which, when supported by policies within their LDPs, extends a certain amount of protection to buildings that are included. Most existing local lists mirror the statutory lists in the criteria they apply, but apply a local interest criterion, rather than national interest. Local listing might be appropriate for sports buildings that do not meet the criteria for statutory listing. Outdoor sports facilities could also be included in the scope of conservation areas, where local policies for the preservation and enhancement of the character of these areas would provide a measure of protection. It would also be possible to extend the concept of local listing to include a specific category for historic areas; however, this may be seen as duplicating conservation area status rather than adding another useful tool for the management and protection of sports heritage.

## 5. Consider other responses to heritage interest – blue plaques, a recording strategy, etc

Recognition of historic sporting venues could also be achieved outside the planning system for example through the use of blue plaques or other interpretive material on or off-site, including publication. The latter is the route largely taken by English Heritage, which has published a series of booklets on sporting heritage. These initiatives help to raise awareness of sporting heritage, and also avoid the potential challenges to physical protection posed by redevelopment pressures. Whilst there is a role for these measures, they would not be an adequate substitute for protection in all cases.

## Recommendations

It is recommended that a framework for protecting sports heritage in Wales is developed. In order to respond fully to the historic and cultural significance of sport in Wales, this framework should include a developed role for protection, using existing national and local tools. It should also foster other initiatives complementing protection, such as interpretive and recording strategies. The existing protection framework seems adequate, but could be better targeted to take sports heritage into account.

- In the first instance, Cadw should undertake a full audit of the extent of existing protection, beginning with an evaluation of all sporting venues that are currently included by default within registered parks and gardens and scheduled ancient monuments to establish their significance. Cadw should also systematically extract the records of listed buildings associated with sports heritage, so as to draw attention to the value of what is already protected.
- Cadw should use this audit to promote the protection of sports heritage, support guidance relating to the management of these existing assets, and encourage a sharper focus on sports heritage in future designation and registration activity. This should include the option of a thematic exercise focussed on the registration of historic sporting venues, as well as inviting consideration of specific sports sites for assessment against existing criteria for both registration and listing.
- Where sites are under immediate threat of redevelopment, or where the dominant heritage values are intangible, support should be given for the establishment of local partnerships able to implement a heritage strategy focussed on recording and interpretation.
- Local authorities could be encouraged to consider sports heritage in local planning designations.

## Next Steps

- An assessment of the significance of sports sites that are already included by default within registered parks and gardens and scheduled areas could be carried out in 2013. In parallel with this, information on listed sports structures could be extracted from the data-base of listed buildings, providing us with a full audit of protected sports heritage sites. A summary of this audit, drawing attention to the sports heritage that is already protected, and showing what can be done with the existing framework for protection, could be prepared by the end of 2013.
- Building on this audit, further focussed designation and registration activity, as well as the development of guidance relating to protecting and caring for sports heritage may be best taken forward as part of the package of measures developed in connection with the Heritage Bill, but

it should be clear that both spot-listing and 'spot-registration' are options for more immediate action where it is needed.

Judith Alfrey  
Head of Regeneration and Conservation  
February 2013