

P-03-263 List Stradey Park – Correspondence from the petitioner to the Chair,. 07.06.2013

Dear Mr Powell,

RE: P-03-263 List Stradey Park

Thank you for the opportunity to comment on the Ministerial Correspondence regarding Cadw's report scoping the options for protecting our sporting heritage. I have informally canvassed members of various heritage groups within Llanelli to draw up my response.

It is strongly agreed that sport is an important and integral part of the heritage of Wales and should be recognised for its contribution to the culture of the country. Sports pitches are the modern day battlefields and sporting battles are celebrated in much the same way as battles of old. A good example is the Max Boyce "9-3" song about Llanelli's victory over the All Blacks at Stradey Park in 1972.

It is felt that sports pitches, and generally most open space, has fallen through the net in terms of protection. While listed buildings and scheduled ancient monuments have consent regimes in place, the Register of Historic Parks and Gardens does not appear to include anything apart from the more obvious places such as the grounds of large mansions and famous parks. The Register is not widely known by the public or even many councillors and in the Llanelli area there is very little on the Register. As it is non-statutory it carries very little weight in our local planning process, where it is generally felt that the attitude is "if it is not listed, it is not important". Making inclusion on the Register as providing the same level of protection as listing would be seen as a great step forward in the protection of recreational heritage such as parks, gardens and sports pitches.

As identified in the consultation document many buildings with sporting use are protected due to listing, but it is the architectural merits of the building that have enabled its protection not the sporting heritage itself. At Stradey Park the only part of the structure that was considered worthy of listing by anyone was the scoreboard. The value of that structure was even recognised by the club itself and it was moved to the new stadium. The rest of the buildings at Stradey Park were not unique and did not have any architectural merit on an all Wales level and nobody claimed that they should be listed. At Stradey it is the area of the pitch that is of interest, because as well as the events that took place there, such as famous victories and the funeral of Ray Gravell, it was unique in being accessible to all at half-time and full-time during matches. The pitch was part of the community as well as the sporting heritage of Llanelli and Wales. The "listing" of the Stradey pitch, or more accurately the inclusion of the pitch on the Register of Historic Parks and Gardens, was the quest of those supporting the petition in the hope that it would afford the pitch some protection. Having the pitch included on the Register proved impossible due to the

current criteria and its strict interpretation, so the current work to consider sporting areas in their own right is very much welcomed.

Local Listing is an area of the planning process that many people in Llanelli interested in heritage would like to see implemented and adhered to. Local Listing has been raised with the Local Planning Authority Carmarthenshire County Council several times over the last few years, but there is clear opposition to it. This does not appear to be the case with Llanelli Town Council and Llanelli Rural Council who appear far more supportive of a Local List. There is concern that using Local Listing to protect heritage of local interest would be pointless unless the LPA was forced to give it equal status to Cadw listing. The problem with local listing and LPA's is that what is of local interest to Llanelli is usually of no interest in other parts of the county or the needs of the county council are deemed to outweigh the needs of locals. In the case of Stradey Park, both local councils formally wrote in support of retaining the pitch within the housing development. The planning committee ignored them and the 5000 or so people who had signed the petition. This is despite the provision of open space in the new development being over 50% less than Planning Policy Wales and the Unitary Development Plan guidelines for the size of development proposed.

The consultation document suggests that it would be possible to extend the concept of local listing to include a specific category for historic areas, but considers that this may be seen as duplicating conservation area status. In Llanelli there is only one conservation area that comprises of Llanelli Parish Church, Llanelly House and the library. A proposed second conservation area in the town has been "under consideration" since 1998. An obligation for LPA's to draw up Local Lists that have statutory protection and which include a specific category for historic areas would appear to be a far more flexible and efficient way of providing protection for our heritage. Conservation areas refer to the group value of (mainly) buildings and sports and recreational areas do not often exist in these areas.

The recommendations are generally supported, but the idea of "encouraging" LPA's to act in certain ways seems inadequate. As has been clear in the case of Stradey Park, Carmarthenshire County Council had a short-sighted financial requirement for the land and flexibility in the system allowed them to do whatever they liked, ignoring public opinion and that of local councils. In Llanelli, and no doubt all across Wales, locals want to protect certain aspects of local heritage, but are powerless to stop LPA's who have short term goals. The current system does not afford the protection required because it naively expects LPA's to act in a reasonable manner. To enhance the system Local Lists and the Register of Historic parks and Gardens should provide the equivalent protection for buildings and areas of local interest that listed status already delivers.

The independent Manchester United Supporters' Trust (MUST), and Spirit of Shankly (SOS), the Liverpool Supporters Union, announced in April that they have submitted nominations for Old Trafford and Anfield respectively to be registered as 'Assets of Community Value' under the "Assets of Community Value Regulations of the Localism Act (2011)". A successful listing would mean that in any circumstance where the grounds were put up for sale, there would be the opportunity to purchase

it, and so secure its future for the community. A campaign to inform the public in Wales of what is possible should be undertaken and communities encouraged to submit nominations to protect assets such as sports pitches in their communities. At Stradey Park new homes are yet to be built. However, a revised phasing plan for the development has recently been submitted and given approval by the LPA. This will see the main pitch now become the first of five phases of development rather than the third. Many locals believe that this change is to stop the ongoing requests to retain the pitch area by developing it sooner. Unbelievably there is no recreational open space at all included in the plans in this area of the site, and the only public area is a small paved section commemorating past players. There remains strong support to retain the pitch within the housing development, particularly in the local Stradey community which has seen the loss of both the community used training pitches at the development site, and also the loss of "green wedge" designated land to the north of the development as part of a 480 pupil school development. In fact the LPA used the existence of the green wedge land to the north to justify providing less than 50% of the recommended open space in the Stradey Park development and building on the pitch, but then gave itself planning permission to build a school on part of that green wedge land, and fence off much of the remaining land too. If justification is required to show the need for statutory protection through the Register of Historic Parks and Gardens and Local Lists, surely Stradey Park is it.

During the consultation document by the Head of Regeneration and Conservation she states "... as the scope of the Register includes '... designed grounds... and places of recreation', sporting venues would be eligible for consideration in their own right." At the end of the document she states "... it should be made clear that both 'spot-listing' and 'spot-registration' are options for more immediate action where it is needed."

On behalf of all those that supported the petition I respectfully request that the Petitions Committee urgently suggest to Cadw that having confirmed the "historic importance" of Stradey Park in previous correspondence and having considered and now confirmed that sports pitches do satisfy the criteria to be included on the Register of Historic Parks and Gardens, that Cadw now immediately undertakes a 'spot-registration' for the Stradey Park pitch. This will ensure the preservation of this world famous Welsh sporting pitch within the proposed housing development, and allow it to be enjoyed by locals and tourists alike.

Yours sincerely,

Vaughan Jones