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27th September 2013

Dear Ms Giddins,

RE: P-03-263 List Stradey Park

Thank you for the opportunity to comment on the Correspondence received from the Minister for Culture and Sport regarding Cadw's refusal to include the pitch at Stradey Park on the Register of Historic Parks and Gardens.

Naturally, the decision is disappointing for both me and the 5500 people who signed the petition and possibly indicates why Cadw is considered by many to be out of touch with the people for whom it is supposedly protecting heritage.

Cadw's reasoning for refusal - "the complex as a whole has lost too many of its key features (for example the stadium, the posts, scoreboard, stands etc) to be included on the Register" – makes it impossible for any such place that does not include listed buildings to achieve inclusion on the Register if they are part of a development site.

As identified in the Cadw consultation document published earlier this year, 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. In a discussion with Cadw in 2005 regarding the pitch, it was clear that having it included on the Register would prove impossible due to the existing criteria and their strict interpretation. However, within 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.**" [my emphasis]. These comments indicating a change of interpretation of the current criteria resulted in the recent official request to consider the Stradey Park pitch for inclusion on the Register. It was, therefore, very surprising and disappointing that Cadw appeared to ignore their research over the last two years and use the same reasons for not including on the Register as they suggested in 2005.

In the case of Stradey Park, the new owners want to build as many homes as possible. The Stradey Park stadium had no structures worthy of listing so the developer was able to demolish them. Once the structures were demolished the pitch which was the subject of the petition was no longer valid to be included on the Register.

This is not what the public, who Cadw is supposedly protecting heritage for, wanted. Nobody claimed that the stands or posts were worthy of listing. We wanted recognition of the "battlefield" of Stradey Park where, like other pitches, famous victories had taken place, but also a place unique in world rugby where the public were able to join the teams on the pitch at half-time and full-time, where the funeral service for Ray Gravell was held not to mention many other services where ashes were scattered. All we were asking for was that Cadw recognised the importance of

the pitch to Welsh life and history over the last century and subsequently the pitch would be retained within the 23 acre housing development.

We could, of course, have hoped for Carmarthenshire County Council to insist on the retention of the pitch, but they had waived the requirement for any affordable housing within the 450 home application and reduced the open space requirement from the recommended 2.6 hectares for a site of this size to only 0.9 hectares on the sloping banks of an opened up stream underneath electricity pylons. Instead they required a £5.6million Section 106 payment all of which was given to the Scarlets (in advance from the Council Reserves) to fund their new stadium. All this on a site which is 63% C2 flood plain. Only in Wales?

As well as the petition and the planning process I also directly approached the developer to try and get it to retain the pitch. I believe that retention of the pitch as a village green would enhance the development but they refused. They also refused to retain the aerial footprint of the pitch within the development. Perhaps this is something Cadw could and should discuss with the developer as it is a small nod to the past in such a massive development.

I strongly feel that Cadw has let down Welsh heritage over Stradey Park. Based on previous correspondence considered by the Petitions Committee, Cadw apparently recognised the historical importance of Stradey Park, but did nothing to help its protection. It appears to have hidden behind the lack of physical structures rather than consider the historical merit of the sporting heritage of the location. If it felt (despite recent comments) that it could not include Stradey Park on the Register due to the outdated criteria but recognised its historical importance, why didn't it make a public statement encouraging retention and put the County Council and developer on the spot? Cadw appears to be a slow moving under staffed organisation which needs more resources and to be allowed to use its teeth. If the future prosperity of Wales is to be partially built on heritage tourism, Cadw must be allowed to exercise strength.

I would be grateful if the Petitions Committee could establish why Cadw's decision considered the lack of built structures remaining at Stradey Park and appeared to ignore the findings of the consultation document it published earlier this year where it suggested sporting venues could already be considered in their own right. Is the Committee in a position to request that Cadw speaks to the developer to achieve some recognition for the pitch? The "9-3 Square" proposed by the Former Players Association is a concrete structure amongst more concrete listing the names of past players, and is not even remotely close to what this 5500 signature petition was trying to achieve.

I would also be grateful for an update on Local Listing as this is an area of the planning process that many people in Llanelli interested in heritage would like to see implemented and adhered to.

Yours sincerely,

Vaughan Jones