

# **Pembrokeshire Coast National Park Management Plan (2020-2024)**

## *Background Paper 5:* Culture and heritage

Pembrokeshire Coast National Park Authority  
September 2018

## **About the UK's national parks**

The purposes of UK National Park are set out in the Environment Act 1995. They are:

- (a) conserving and enhancing the natural beauty, wildlife and cultural heritage of the area
- (b) promoting opportunities for the understanding and enjoyment of the special qualities of those areas by the public

In the event of an irreconcilable conflict between the purposes, conservation has greater weight (the 'Sandford principle').

Pembrokeshire Coast National Park Authority is charged with delivering the purposes in Pembrokeshire Coast National Park and has a duty to seek to foster the social and economic wellbeing of National Park communities in its pursuit of the purposes.

## **Management Plan 2020-2024**

Each National Park Authority is required to prepare a five-yearly National Park Management Plan "which formulates its policy for the management of the relevant Park and for the carrying out of its functions in relation to that Park" (Environment Act 1995, section 66). The Environment Act 1995 gives relevant authorities a legal duty to have regard to Park purposes and to the Sandford Principle<sup>1</sup>.

A number of background papers have been compiled in preparation for the Pembrokeshire Coast National Park Management Plan 2020-2024. They cover:

1. Landscape, seascape, tranquillity and dark skies
2. Well-being, equality and livelihoods
3. Outdoor recreation and learning
4. Nature conservation
5. Culture and heritage
6. Climate and energy
7. Natural resources
8. Legislation and policy

The Well-being of Future Generations (Wales) Act 2015 and The Environment (Wales) Act 2016 add further statutory backing to National Park purposes and the need for participation and collaboration to achieve them. However there is a two-way relationship between National Park purposes and the legislation. The topic areas are intended to reflect this complementarity, to demonstrate the alignment of National Park policy with Wales' well-being, climate, natural resource and ecosystem resilience goals, and to help identify opportunities to add value between national and local policy areas. The South-west and Marine area statements prepared by Natural Resources Wales will also be an important component of management.

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<sup>1</sup> "In exercising or performing any functions in relation to, or so as to affect, land in a National Park, any relevant authority shall have regard to the purposes [...] and, if it appears that there is a conflict between those purposes, shall attach greater weight to the purpose of conserving and enhancing the natural beauty, wildlife and cultural heritage of the area comprised in the National Park." (Environment Act 1995, s.62)

The background papers set out the state of the National Park and provide a context for identifying opportunities and challenges that the Management Plan will need to address. The opportunities and challenges, and accompanying maps, are set out in an informal document for early engagement with partners and public.

The background papers are technical in nature. Where use of technical terms is unavoidable, they are explained in the text and/or in a glossary.

### **A place-based approach**

While many natural resource issues are best considered at a landscape-scale, action locally should take account of local circumstances. It is proposed that the Management Plan 2020-2024 adopts a place-based approach to policy implementation, with five areas identified as follows:

- Preseli Hills and North Coast
- North-west Coast
- West Coast
- Daugleddau
- South Coast

### **Next steps**

An outline timetable for Management Plan preparation was approved in the Authority's Corporate and Resources Plan 2018/19 (page 33). A more detailed timetable is given below. This was approved by the National Park Authority at its meeting of 20<sup>th</sup> June 2018.

<b>Milestone</b>	<b>By whom/when</b>
Draft preparation timetable, and methods of engagement	Leadership Team, external bodies. May 2018
Approve timetable and engagement proposals	National Park Authority. June 2018
Engage with key stakeholders: <ul style="list-style-type: none"> <li>• Collate evidence (outcomes, issues, policy impact)</li> <li>• Draft / revise Plan and associated assessments (see "Requirements for impact assessments" below)</li> <li>• Prepare an action planning framework</li> </ul>	July to December 2018
Member Workshops to discuss draft reports and assessments	Spring 2019
Authority approval of consultation draft documents (Management Plan, Sustainability Appraisal / Strategic Environmental Assessment, Habitats Regulations Assessment, Equality Impact Assessment)	National Park Authority June 2019
Translation and formatting	June/July 2019
Public consultation (12 weeks)	Park Direction Team August 2019 - October 2019
Report of consultations to Authority. Authority approval of amended documents.	National Park Authority December 2019

<b>Milestone</b>	<b>By whom/when</b>
Translation and formatting	Park Direction/Graphics Team December 2019/ January 2020
Feedback to consultees	December 2019
Publication of approved Management Plan and assessments; formal notification / adoption statements.	January 2020

## **Opportunities and challenges identified from this background paper**

**Integrating management of cultural and natural assets at the landscape scale.**

**Understanding and celebrating the existing and potential contribution of the National Park to contemporary culture and creativity.**

**Promoting the Welsh language and local dialects.**

**Removing risks to heritage assets.**

**Conserving local distinctiveness in the built environment.**

## 1. Scheduled Monuments

1.1 The Ancient Monuments and Archaeological Areas Act 1979 (As Amended) is at the moment the primary legislation safeguarding archaeological features. Nationally-important sites and monuments are listed on a schedule by Cadw, the historic environment service of Welsh Government on behalf of Welsh Ministers, and the schedule is used to manage operations on and around the sites.

1.2 Scheduled Monuments represent an important cross-section of the known archaeological resource. The Historic Environment Record for the National Park area contains 284 Scheduled Monuments. Over time, more categories of monuments will be considered, and more sites will be scheduled.

1.3 Until 2010, Cadw operated a monitoring system which aimed to assess sites on a five-yearly basis, and to establish whether their condition is stable, improving or declining. A third round of Cadw monitoring of scheduled monuments took place between 2003 and 2010 (so the figures below may be up to 10 years old). During this round, 249 of the 284 Scheduled Monuments in the National Park were visited (88%) and their condition was found to be as follows.

1.4 There appears to be a relatively high percentage of Scheduled Monuments in moderately and severely worsened condition in the National Park, as compared to Wales as a whole. This is due in part to coastal erosion, which makes degradation and eventual loss of some Scheduled Monuments inevitable, and which may make interim management unsafe. Coastal erosion also leads to more frequent discovery of sites and monuments, which further inflates the figure. It may also be a function of how different monument recorders operate across Wales, including some variation in how condition (e.g. encroachment by vegetation) is assessed.

1.5 Some data on the condition of Scheduled Monuments in the National Park is available and has been provided by Cadw (July 2017). However, the data is not comprehensive and no trend data is currently available.

### Summary of Scheduled Monument condition in Pembrokeshire Coast National Park:

Condition	Count	Percent
Greatly improved	6	2.42%
Improved	38	15.32%
Stable	115	46.37%
Worsened	88	35.48%
Very much worse	1	0.40%

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## **2. Historic environment record**

2.1 Information about known archaeological sites and features is contained within the Historic Environment Record. This includes Listed Buildings and Scheduled Monuments. The Historic Environment Record, which includes all of the area of the National Park, is held and maintained by Dyfed Archaeological Trust, and has been formally recognised and adopted by the NPA.

2.2 An additional source for historic environment information regarding known sites in the National Park is the National Monuments Record of Wales, part of the Royal Commission. This includes a database of records, some of which will not be held by the Historic Environment Record, together with a wider linked archive. A range of survey activities undertaken by the Royal Commission in the National Park, including regular aerial reconnaissance, limited remote sensing (Lidar) mapping and detailed ground survey continue to add to the National Monuments Record of Wales information archive. The Royal Commission also manages and regularly updates the Maritime Database for Wales which includes numerous offshore assets around the Pembrokeshire coast.

2.3 While Scheduled Monuments are protected by law, there are approximately 7,500 recorded sites in the National Park, and the vast majority of these are not. These records range from individual find sites to Iron Age forts and the numbers are increasing with the discovery of new sites. Their condition is in many cases unknown, and may be difficult to assess; some of the entries are only known from documentary sources or aerial photos, for example. This, coupled with the diversity of the features themselves, means that it is difficult to make a meaningful overall assessment of many of the records.

## **3. Maritime assets**

3.1 The maritime assets spatial dataset (available from Welsh Government's Lle data-portal) was produced by the Royal Commission for the Ancient and Historical Monuments of Wales and consists of point data for all of the marine heritage assets that have been recorded within the National Monuments Record Wales by the Royal Commission for the Ancient and Historical Monuments of Wales. The dataset will be updated on a biannual basis.

## **4. Historic Landscapes**

4.1 Significant historic landscapes, the elements that give them their historic character, and the landscape's risk status, are identified in two Registers.

4.2 The Register of Landscapes of Outstanding Historic Interest in Wales is maintained by Cadw, the International Council on Monuments and Sites and Natural Resources Wales. It lists four areas in the National Park: Preseli; St Davids Peninsula and Ramsey Island; Skomer Island, and the Milford Haven Waterway. The Register of Landscapes of Special Historic Interest in Wales lists five further National

Park historic landscapes: Newport and Carningli; Pen Caer; Stackpole Warren; part of the Lower Teifi Valley, and Manorbier.

4.3 Registration does not afford any statutory protection, although it is taken into account in planning decisions and guidance. Cadw has however funded a programme of characterisation to improve understanding of the elements that make up registered landscapes, so that organisations can better protect them through existing statutory instruments. For example, the pattern and nature of field boundaries and vernacular buildings are key features of the National Park, and these have been taken into account in the NPA's Landscape Character Assessment and Sustainable Design guide. The Welsh landscape information system LANDMAP also includes a layer of historic landscape data, used in decision-making.

## 5. Conservation Areas

5.1 Areas of special architectural or historic interest are designated as Conservation Areas by the NPA. There are 14 within the National Park: Angle, Caerfarchell, Caldey Island, Little Haven, Manorbier, Portclew, Porthgain, Saundersfoot, Solva, St Davids, Tenby, Trevine, Newport and Newport Parrog.

5.2 A Conservation Area in Nevern is currently under consideration.

5.3 After designating Conservation Areas, the NPA has a statutory duty to produce Conservation Area Statements, and Proposals Documents. These have been drawn up in partnership with the Conservation Area Working Groups (elected through the relevant City/Town/Community Councils), with full public consultation. The Character Statements assess the importance of the Conservation Areas, together with their physical condition and risk factors. The Proposals Documents (adopted as supplementary planning guidance in 2011) set out how the character of each Conservation Area can be preserved and enhanced.

[Angle](#)

[Caerfarchell](#)

[Caldey Island](#)

[Little Haven](#)

[Manorbier](#)

[Newport and Newport Parrog](#)

[Portclew](#)

[Porthgain](#)

[Saundersfoot](#)

[Solva](#)

[St Davids](#)

[Trefin](#)

[Tenby](#)

## 6. Listed Buildings

6.1 Listed Buildings are buildings of special architectural and historic interest, group value, technical importance or association with important people/events. The number of Listed Buildings therefore reflects the significance and diversity of the historic built environment. Listed Buildings represent the best examples of the



National Park's historic built resource and range from medieval churches and castles to milestones and telephone kiosks.

6.2 Cadw is responsible for designating Listed Buildings, and completed an all-Wales survey in 2005. Buildings can also be individually spot-listed. Listing covers not only the building itself, and its interior, but also its curtilage and buildings which pre-date 1948 within the curtilage. Listed Buildings are graded as I, II\* and II according to their importance. There are 1,236 Listed Buildings in the National Park: 33 of Grade I; 77 of Grade II\*, and 1126 of Grade II.

6.3 The NPA has a responsibility to ensure that historic buildings are conserved. Priorities are based on a Buildings At Risk Register, which was undertaken by the NPA and Cadw, to establish the condition of Listed Buildings within the National Park and prioritise those in need of urgent repairs.

6.4 The most recent Buildings At Risk survey was carried out in 2009. Of the 1,236 Listed Buildings in the National Park, 65 are on the Buildings at Risk Register. Of these, 18 are 'buildings at extreme risk' (the highest level of concern), 2 are 'buildings at grave risk' and a further 45 are 'buildings at risk'.

6.5 In terms of maintaining listed buildings, less than 10% (5.8%) are identified as being at any degree of risk. There is potential for the uses of listed buildings to change – 3 listed building consents for change of use were granted between April 1st 2016 and March 31st 2017.

## **7. Historic parks and gardens**

7.1 Cadw, the International Council on Monuments and Sites and the former Countryside Council for Wales have compiled a Register of Parks and Gardens of Special Historic Interest in Wales. The Register identifies the importance of the listed parks and gardens, but currently does not give them statutory protection. Fifteen Historic Parks and Gardens lie wholly or partly within the National Park boundary. They are graded on a criteria basis and consist of 1 Grade I, 2 Grade II\* and 12 Grade II sites. There is currently no condition or risk survey for Historic Parks and Gardens.

## **8. Local distinctiveness**

8.1 The designated built environment accounts for less than 2% of the total historic built heritage of the National Park. However, non-designated buildings and boundaries contribute individually and cumulatively to the local distinctiveness of the built environment. There is currently no established way of assessing the state of features of local distinctiveness in the built environment but there have been examples where local built character has been lost through neglect and misrepair.

8.2 However, the Local Development Plan 2 for the National Park (to 2031) contains a policy on protecting buildings of local importance (Policy 15<sup>2</sup>). This

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<sup>2</sup> Policy 14 in Local Development Plan 1 (to 2021)

criteria-based policy offers owners scope to develop buildings of local importance while ensuring that important features of them are conserved.<sup>3</sup>

Policy 15 protects these buildings of local importance, using the following criteria for selection:

- a) degree to which the building remains in its original integrity;
- b) quality of the individual building's architecture;
- c) position and influence on the townscape or landscape;
- d) association with an important local figure or event.

8.3 An Article 4 direction is a statement made under the Town and Country Planning (General Permitted Development) Order 1995. Article 4 directions remove some or all permitted development rights on a site, for example within a conservation area or curtilage of a listed building.

8.4 Article 4 directions are in place for St Davids, Newport, Tenby, Solva and Little Haven Conservation Areas, where planning permission is required for works including the alteration of doors and windows, the creation of hard-standings and the construction/demolition of boundaries/gates to dwellings fronting public highways.

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<sup>3</sup> Planning Policy Wales Edition 9 (November 2016) includes a revised Chapter 6 The Historic Environment. This chapter was revised in conjunction with Cadw following Royal Assent of the Historic Environment (Wales) Act 2016. Updates take into account Cadw's Conservation Principles for the sustainable management of the historic environment and how the historic environment contributes to the well-being goals set out in the Well-being of Future Generations (Wales) Act 2015. Further guidance has subsequently been provided in Technical Advice Note 24: The Historic Environment (May 2017), which replaces three Welsh Office Circulars on the Historic Environment. This new Technical Advice Note provides guidance on how the planning system considers the historic environment, with specific chapters on components such as Listed Buildings, Conservation Areas and Archaeological Remains.