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To: [NDE](#)
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Please find attached comments from Cadw on the consultation document National Framework Document 2020-2040. If you have any questions or wish to follow up on any points raised please can you respond to Suzanne Whiting in the first instance.

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Helpwch yr amgylchedd - peidiwch ag argraffu hon os nad oes gwir raid. Help our environment - only print this if really necessary.



National Development Framework

Cadw response

14 November 2019

We have read the Draft National Development Framework document with interest. We consider this a very important document and support its objective to present a vision for future development in Wales that will take account of long-term impacts. To this end we have reviewed the document and provide here our comments.

Overall, we have to express our great disappointment that the Framework overlooks, underplays and fails to recognise the opportunities that are presented to Wales by its unique world class historic environment and cultural heritage. If, as is stated on page 9 – the “NDF gives a spatial expression to Welsh Government policies of national importance” then a striking absence from the document is any overall objective or consideration of the potential for the Framework to recognise, enhance or protect the cultural heritage and historic environment of Wales. As a consequence we do not consider that the NDF takes due regard for the objectives of the Well Being of Future Generations Act.

Wales: An Overview – Challenges and Opportunities (p12) opens with the statement “Wales is a nation with a long and proud history and a rich social and cultural heritage. We face challenges and opportunities and are committed to protecting the well-being of our future generations”. However this statement is not followed up within the Framework other than by a few scattered references without any overall objective or identifiable desired outcome. There is no sense of a vision within this framework for how the historic environment should contribute to the future of Wales or for how this unique inheritance should be passed on to future generations – an expectation of the Well-Being of Future Generations Act. This absence hugely underestimates the role of historic environment as a shaper of our landscapes and townscapes and appears to ignore the importance that communities throughout Wales place on their history and heritage.

There are many overlooked opportunities where consideration of the role of the historic environment could be included. For example on page 14 – Our Place in the World there is no reference to our World Heritage sites which have international recognition and draw visitors from all Continents. Also, on the same page Our Visitors – there is no mention that a considerable proportion of people are drawn to Wales by its rich heritage.

Challenges and Opportunities (p15) – rightly identifies climate change as a significant issue but the consequences are not fully considered. The historic environment is both vulnerable to impact from a changing climate yet also has the potential to assist with solutions. The re-use of existing, traditional buildings is recognised as a much more eco-friendly way to avoid the excessive impact of new construction on the environment. New construction is recognised as being one of the biggest contributors to emissions and greenhouse gases. Encouraging and helping the recycling of the existing traditional building stock is an active way of tackling climate change – with the additional benefits to local communities of

maintaining local character and supporting skills and employment. Of the four nations of the United Kingdom, Wales has the highest percentage of historic housing so a strategy to address the continued sustainable use of these buildings in the face of climate change is essential.

Also absent from the section on Challenges and Opportunities is any consideration of the opportunities that the historic environment offers for communities. There are economic benefits from heritage – recent work on the value of heritage has shown that 40,000 jobs or 3% of total employment in Wales supported by the sector, including 3,500 people directly employed. The role of heritage in tourism is one of the most visible areas. However, it also contributes to social cohesion and active living and provides opportunities for volunteering and lifelong learning. All of these areas are important to the Well Being of Future Generations Act and should be given reference within objectives and opportunities. As a minimum these considerations should be referenced in this section – preferably with an objective to enhance and maximise positive benefits of the historic environment.

NDF Outcomes:

We recognise that there is a brief reference to heritage in Outcome 6 - “The culture, heritage and environment of Wales will play a positive, modern role in the economy by attracting the interest and expenditure of tourists, and providing a distinctive and trusted brand for Welsh businesses”. However, by placing the historic environment within an objective related to the economy, this fails to address the full range of objectives that Welsh Ministers have set for the historic environment. In particular this overlooks the value of the historic environment as a cultural and social enabler – particularly relevant in the context of the Well Being of Future Generations (Wales),

We propose that a standalone outcome is required within the NDF for the historic environment of Wales. This should align with the mission statement that Welsh Ministers have set for Cadw, its historic environment service which is “to work for an accessible and well-protected historic environment for Wales”. We therefore suggest that the inclusion of an objective covering the work of the Welsh Ministers would be appropriate.

A Wales where people live...

12. In places with an accessible and well-protected historic environment

Wales’ historic environment, including its historic landscapes, townscapes, buildings and monuments are a legacy handed from generation to generation. They contribute to our sense of place and identity. We will help people to cherish and enjoy our cultural heritage and promote the skills needed to sustainably manage our historic assets to maximise their social, economic and environmental value to society today and for the future.

Spatial Strategy – where Wales will grow

We agree that the proposed strategy is logical and reflects historical trends. We recommend that reference should be made here to the importance of recognising

and respecting Sense of Place and the character of towns, cities and rural areas when designing new development. Recent projects such as the redevelopment of the Hafod Morfa Copper Works in Swansea is an exemplar of how Wales can be a world leader in sensitive heritage-led development of urban areas. The Framework should aspire to leadership in this regard. The industrial heritage of our urban centres should be seen as an opportunity and specifically referenced eg page 26 “supporting our urban areas”.

Also important is the need to encourage the sensitive re-use of existing buildings. Not only do older buildings have much to contribute in terms of Sense of Place, regional character and heritage values but the re-use of existing buildings is less harmful to the environment than new build. This is an issue that the Framework needs to address directly to ensure that the construction industry in Wales is encouraged to minimise its emissions, greenhouse gases and material being sent to landfill waste.

Policy 8 Strategic framework for biodiversity enhancement and ecosystem resilience

We support the NDF statement that focus on urban growth requires an increased emphasis on biodiversity enhancement in order to ensure that the approach is sustainable. We would add to this the need also to consider opportunities for supporting protection and enhancement of the historic environment. There is often a strong relationship between the natural and historic environments and opportunities should be sought for mutually positive outcomes. Many natural designated areas also include historic assets and vice versa. A more joined-up approach to natural and historic environment planning should be encouraged. There are already good working arrangements between NRW, Cadw and the four Regional Welsh Archaeological Trusts which can be utilised to support these objectives.

We recommend that the NDF should encourage collaborative working between organisations with interests in both natural and historic environments and champion the importance of joined-up planning.

Strategic green infrastructure in and around urban areas (page 34)

Cadw welcomes the reference to the importance of green spaces in urban areas but is surprised that this does not include any mention of the many hundreds of historic parks that have benefitted generations of Welsh communities, providing them with opportunities for enjoyment, fresh air and exercise.

The Historic Environment (Wales) Act 2016 places a duty upon the Welsh Ministers to compile and maintain a register of sites of special historic interest in Wales that includes parks, gardens, designed ornamental landscapes and places of recreation. When it comes into force in 2020 this will replace an existing non-statutory register that currently includes 349 historic parks and gardens. While some are privately owned, this also includes some of our best known and loved public urban parks.

5. The Regions

The datasets used to inform the NDF do not appear to have included information on the historic environment. This means that useful regional information is missing from the maps and the discussions. We recommend that it would be beneficial to draw on this information in consideration of the character and challenges of the regions – see below. This data is readily available to view through Cadw's Cof Cymru website and the datasets are also located on the Welsh Government Lle website.

North Wales:

North Wales benefits from a very high profile historic environment with two existing World Heritage sites (Pontcysyllte aqueduct and canal; Castles and town walls of Edward I in Gwynedd) and one tentative nomination (Slate Landscapes of Northwest Wales). We believe this is exceptional and unmatched by many other places in either the UK or further afield. Together with the wider historic environment of the region these provide an exceptional international profile and are certainly one of the known drivers for tourism to the area. There is no mention of this in the chart on page 48 or the following discussion. This is a notable omission since they are drivers of tourism with its associated transport and accommodation requirements.

Mid and South West Wales:

As with North Wales, there is no reference in the NDF to the historic environment in this section. While there are no World Heritage sites within this region, there are many hundreds of nationally recognised historic assets including key tourist attractions eg Pembroke, Aberystwyth, St Davids. The urban centres named for support are all historic in origin, many benefitting from historic buildings including industrial and redundant places of worship that could be used to encourage heritage-led regeneration schemes. Although there is a passing reference to opportunities to support historic assets on page 60 this is insufficient to address the ambitions of Welsh Ministers as expressed in the document *Priorities for the Historic Environment of Wales* (2018).

South East Wales

Of all the regions, perhaps it is SE Wales that is most visibly defined by its history as the crucible for the industrial revolution, and which is still living through the impact of the slow retraction of heavy industry. We support the statement aspiration expressed on page 65 to address the impact of this decline but would wish to see a more positive statement included about how that legacy can be harnessed as a basis for developing a strong Wales brand of positive heritage regeneration. The importance of defining Sense of Place as a driver for good quality development should be recognised and which would give proper respect to the communities of the industrial South Wales Valleys. The inscription of the Blaenavon Industrial Landscape as a World Heritage site recognises the international heritage significance of the region and should be integrated with future plans.

We appreciate this opportunity to provide our comments on the National Development Framework and would be pleased to discuss the points that we have raised in more detail. We can also provide data, advice and support for the process to better enable the historic environment to be incorporated into the objectives and outcomes of the process.

Cadw