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Llywodraeth Cymru
Welsh Government

Welsh Government
Consultation – summary of response

Management Plan

**For the Castles and Town Walls of King Edward in Gwynedd
World Heritage Site**

April 2018

Mae'r ddogfen yma hefyd ar gael yn Gymraeg.
This document is also available in Welsh.

Management plan for the Castles and Town Walls of King Edward in Gwynedd World Heritage Site

Summary of Response Report

Consultation period: 11/10/16 – 09/01/17

Overview

Cadw is responsible for the management of the Castles and Town Walls of King Edward in Gwynedd World Heritage Site (WHS) which comprises four properties (Caernarfon Castle and Town Walls, Conwy Castle and Town Walls, Harlech and Beaumaris Castles).

UNESCO formally inscribed the site on the World Heritage List in 1986. World Heritage Site status brings with it responsibilities to meet the requirements of UNESCO's Operational Guidelines for the Implementation of the World Heritage Convention. UNESCO advocates the production of effective management arrangements and specifically management plans for each World Heritage Site to bring together all responsible parties and enable a coordinated approach to site management. The production, adoption and regular review of agreed management plans for each World Heritage Site is fundamental to the approach of Cadw, partners and local communities to the protection of these important sites in Wales.

The existing management plan for this site was produced in 2004 and its associated action plan was intended to last for ten years. During its lifetime several substantial actions have been implemented, including significant conservation work, installation of new visitor facilities, and new interpretation. Also during this period there have been several wider strategic developments such as updated local and unitary development plans, and new primary legislation in respect of the historic environment and the well-being of future generations in Wales.

A new management plan is therefore required, that will provide a clear strategy and vision for the WHS, and guide its sustainable management for the next ten years. The formal publication of the Draft Management Plan and consultation exercise was launched by the Minister for Skills and Science at the prestigious World Heritage: UK Conference which was held at Galeri Caernarfon on the 10th of October 2016.

The consultation period ran until 9 January 2017 and presented below is a summary of the responses received.

Introduction

The new Management Plan is intended to provide a robust framework to guide the management of the site. The content of the plan is governed by the unique qualities of the individual World Heritage Site, but, to ensure compatibility with the requirements of UNESCO, it should provide an accurate, comprehensive and up to date description of the site and its setting and explain how it is protected. The plan must list the key attributes of the site and its Outstanding Universal Value (OUV). From this, the principal management needs of the site can be established.

World Heritage Site status is a material consideration when determining planning applications and the Management Plan therefore provides an important link between the international requirements of UNESCO on the one hand, and the aspirations and requirements of local planning authorities and communities on the other.

The primary role of the Management Plan is to set out policies and actions designed to protect, conserve and manage the World Heritage Site. However, the Plan has a number of additional purposes including for example:

- As a tool to help develop the identity of the World Heritage Site – what it means to communities and stakeholders today as well as encouraging understanding of the past;
- Ensuring a coherent and consistent approach to the management of the World Heritage Site and its setting across all four locations, which fall within , four different local planning authority areas (Gwynedd, Isle of Anglesey, Conwy and the Snowdonia National Park Authority);
- Forming a focus around which stakeholders can be brought together, encouraging the development of effective partnership working; and
- Having a wider remit than simply conservation and protection, including the promotion of sustainable tourism the economic and regenerative potential of the World Heritage Site, and its cultural and educational role

Some of the main changes include:

- An increased focus on collaborative working with key partners and a broader, more holistic view of the site which deliberately includes the surrounding communities
- Strengthening formal management arrangements
- Greater emphasis on setting including definitions and the provision of character statements for each of four communities
- Revisions to the mapping of essential setting and significant views (specifically Caernarfon and Conwy) to reflect new thinking
- An emphasis on broader significance that includes more context on the four communities, the relationship between the monuments and the sea, cultural considerations and more recent historical context including issues around Welsh nationalism and the role the monuments have played in commemorative events
- The inclusion of a new vision and overarching principles which are based on those of the Well-Being of Future Generations (Wales) Act (2015)
- The inclusion of a broad policy context and specific objectives to underpin and support the main action plan – including a focus on the Welsh language, the visitor experience, economic and regeneration benefits, community engagement, marketing, and sustainability.
- A detailed action plan which identifies and prioritises actions in support of the stated policies and objectives
- The inclusion of a monitoring framework to consider and assess progress

These aim to achieve the following outcomes:

- Strong association with the Well-being of Future Generations (Wales) Act and an ability to measure progress against the 7 well- being goals
- Greater partnership collaboration, buy-in and impact
- Continued protection of the setting of the WHS particularly in relation to future or planned development
- Increased awareness to the broader significance of the site and improved community engagement

- Increased skill development and lifelong learning opportunities
- Greater use of World Heritage status to secure sustainable economic and regeneration benefits
- Improved sense of place and townscape quality within the four communities

The consultation

Officials in Cadw (the Welsh Government's Historic Environment Service) have been working with consultants from Arcadis in the preparation of the new Management Plan, taking into account the views of a multi-agency steering group, and informed by extensive public and stakeholder consultation and engagement over the 12 months preceding the formal consultation. These included:

- Discussion of the new draft plan at the regular meetings of the Steering Group of the Castles and Town Walls of King Edward in Gwynedd World Heritage Site;
- Stakeholder consultation on 1 December (Caernarfon), 2 December (Harlech), 14 December (Beaumaris) and 15 December 2015 (Conwy)
- Public meeting on 9 February (Caernarfon), 10 February (Beaumaris), 24 February (Conwy) and 25 February 2016 (Harlech)
- Stakeholder Thematic Workshops in Caernarfon: 13 April 2016 Planning and Conservation and 13 April 2016 Economy and Regeneration
- Stakeholder Thematic Workshops in Caernarfon: 23 June 2016 Planning and Conservation and 24 June 2016 Economy and Regeneration.

A set of public and stakeholder events were also held as part of the formal consultation process and these are as follows:

- 5 December (Caernarfon), 6 December (Beaumaris), 7 December (Conwy) and 14 December 2016 (Harlech).

The formal consultation ran for a period of 12 weeks from 11 October 2016 and closed on 9 January 2017. The consultation was published on the Welsh Government and Cadw websites and emails were sent to stakeholders to draw their attention again to the consultation. The consultation was available on line however a small number of the draft management plans were made available at the public and stakeholder events outlined above.

Responses received

The Welsh Government and Cadw would like to thank all those who responded to the consultation. All the responses are being analysed and considered as part of the process of finalising the new Management Plan for the Castles and Town Walls of King Edward in Gwynedd World Heritage Site. In total there were 15 responses to the consultation and a list of the respondents who agreed to publication of their details is at Annex A.

Outcome and next steps

The responses received provide a clear agreement – with some refinement - to a new Management Plan for the Castles and Town Walls of King Edward in Gwynedd World Heritage Site. All of the comments are being considered and will be acted upon where appropriate to do so in finalising the new Management Plan. The new management plan is intended to be published by the end of July 2017.

Consultations Questions

Q01 Is the draft clear about the role and purpose of the management plan?

Q02 Is the updated description of the site and its significance sufficient to help decision makers protect the Outstanding Universal Value of the site?

Q03 Are the definitions of setting, essential setting, significant views and sense of arrival (Chapter 2.6) sufficiently clear? Does the inclusion of character statements help support planning and development considerations within the four communities?

Q04 Are the range of policies outlined the right ones and do they reflect the relevant and emerging challenges facing the WHS?

Q05 Are there any policies, objectives or actions missing?

Q06 Are the monitoring indicators suitable and will they help provide a robust framework to help assess progress of management arrangements?

Q07 We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

Responses to each question

There were 15 responses to the formal consultation

Q01: Is the draft clear about the role and purpose of the management plan?

Over all the respondents agreed that the draft was clear about the role and purpose of the management plan. However a few respondents suggested further clarity was needed. A few commented that it needed to be made clear who “owns” the management plan and is responsible for its implementation, monitoring and updating – i.e. it should be more explicit that the Steering Group is the owner and responsible body and that it is for stakeholders to “adopt” it.

It was also commented that the role of the Co-ordinator should be more clearly stated with his responsibility to the World Heritage Site and Steering Group being transparent. Two respondents commented that the Steering might want to give consideration to the delegation of various specific matters of management to specialist Sub Groups. The plan could make recommendations for such sub-groups to take on such responsibilities as research, education, sustainable tourism, planning, conservation and outreach etc.

One respondent commented that the “ambitious action programmes showing who is tasked with leading on these are listed in the Plan but it is unclear who monitors and evaluates this work ensuring that targets are achieved satisfactorily”. Another respondent said that paragraphs around 1.3 needed to be moved around to better set the scene and “hold” the reader.

Q02: Is the updated description of the site and its significance sufficient to help decision makers protect the Outstanding Universal Value of the site?

Over all the respondents felt that the updated description of the site and its significance was sufficient to help decision makers protect the Outstanding Universal Value of the Site.

One respondent did however comment that the sections around engagement with businesses and the positive impact of the Castle, walls and town can have on local businesses needed strengthening. The document captured the economic impact the castles could have but not the value it could add to local businesses.

Another respondent suggested that the Statement of Outstanding Value should be included in the text of the plan unaltered - or as an appendix - as this was the key document on which decisions about protection should be based. Another suggested that whilst it was useful to see the key attributes of the OUV defined in section 2.5, there was little reference thereafter about how the attributes should be used by decision makers when considering proposals for new development and change. Adding a section on this was suggested to explain that heritage impact assessments undertaken in line with the 2011 ICOMOS Guidance would need to assess the impact of proposals on the attributes of OUV both individually and collectively and that, where appropriate, mitigation measures should be put in place. And as such, where effective mitigation cannot be achieved proposals may be needed to be refused permission in line with planning guidance. Whilst there was no reference to the heritage impact assessments in Policy Objective 4 concerned with the setting of the WHS, there was currently no reference in Policy Objective 3 to the need for HIA within the World Heritage Site itself.

Q03: Are the definitions of setting, essential setting, significant views and sense of arrival (Chapter 2.6) sufficiently clear? Does the inclusion of character statements help support planning and development considerations within the four communities?

All of the respondents were supportive of these statements. The addition of both the essential setting and significant views was strongly supported with one respondent suggesting other “significant views” in Harlech should be included.

The inclusion of character statements was welcomed as significant in supporting planning and development consideration. One respondent suggested that it would be helpful if, in commenting on the character statements, the management plan could draw out more clearly those statements of the setting which have attributes that are related to the OUV of the WHS and the need to protect them, for example, how the plan forms of Caernarfon and Conwy relate to the town defences.

One of the respondents believes that further explanation was needed in terms of “sense of arrival” mainly the section which states “Current approaches to the site are particularly sensitive, but historic routes may also be relevant” – it was not understood what was meant by this and that elaboration of this statement was required, including examples. This respondent also felt that some parts of the document placed too much negative emphasis on the development at Victoria Dock i.e. “Regeneration of the dock area has proved to be an important addition to the economy of the town, but the design of the commercial development is somewhat out of character with the World Heritage Site”. Re-wording of part of this description was suggested to avoid a rather negative view of the town.

Another respondent said that some excellent points on “sense of arrival” – particularly in terms of “where does the journey begin?” had been made at one of the stakeholder events as part of the consultation but that these had not been reflected in the draft Management Plan.

Some re-ordering was felt necessary by one respondent who stated that it would be beneficial to separate out each site within this section of the plan and have the plans/maps

with descriptive texts on adjacent pages – not only would this be easier to read but make the section more relevant to the particular site.

Q04: Are the range of policies outlined the right ones and do they reflect the relevant and emerging challenges facing the WHS?

For the most part, respondents said that the range of policies was comprehensive and sensible in terms of the development and protection of the sites. The new strategies, plan and partnerships produced to assist with WHS management and dissemination / education were welcomed and similarly proposals for further strategies and plans e.g. that for Research Policy 13A were clearly very desirable.

One respondent felt that more assurance was needed in objective 4 policies which link with the draft guidance (secondary legislation to complement the Historic Environment (Wales) Act 2016, “Managing Change in World Heritage Sites in Wales”. It was considered that this document would be essential to every Local Planning Authority to enable them to assess the impact on World Heritage Sites – this guidance should link to the new management plan.

The focus on developing a unique brand for the site as well as capitalising on the World Heritage Site status to ensure economic and social benefits was welcomed. There was comment about what structures would need to be put into place to support the Steering Group in terms of destination management, traditional skills, interpretation and sustainable travel. This respondent agreed with policy 15B with regard to the establishment of sub-groups so that the 4 sites could meet to discuss weaknesses within their areas and what worked efficiently and well to ensure consistency between the 4 sites. It was asked whether any consideration had been given to establishing a formal implementation / management structure or to adapting any local structures within the four areas to implement the policies on a more local level.

The point was made by one respondent that there were still some inconsistency with some very specific policies such as logo development being more of an action rather than a policy; whereas other policies simply restated the objective (e.g. 2A) with no indication of how any substantive progress could be made to promote the Welsh Language.

Finally, there was a comment about the reference to Article 4 Directions (Chapter 4, 4.3.7.) in that more clarity could be added if the format of the wording was changed to include bold text i.e. “LPAs to restrict the scope of permitted development rights (**residential properties**) in a particular special area, so that full planning applications are required.”

Q05: Are there any policies, objectives or actions missing?

There were several suggestions and comments about what policies, objectives and actions might be missing.

There were two comments from respondents that the risk management strategy was not fully developed and emergency/disaster management procedures should be included. The view was that this did not need to be detailed but simply a cross-reference to the existing measures for Cadw and other key stakeholders already in place. The proposal to develop a Risk Management Strategy and review it periodically was noted but it needed to have greater prominence with a time limit by which it should be produced.

Some respondents felt that the sense of this WHS being part of the UK portfolio of world heritage and subject to the same regulations and expectation as other sites could perhaps be strengthened. Another respondent felt that Policy Objective 3 should refer to specifically to the need for Heritage Impact Assessment in line with the 2011 ICOMOS Guidance. Furthermore, there was another reference to Part 4.3.7 [See Q03] where a respondent said that Part 4.3.7 stated that there would be “benefits in having a consistent approach” including the use of Article 4 Directions however they pointed out that policy 3B stated that the directions should be used “if necessary”. If the aim was to ensure consistency between the 4 sites then the use of “if necessary” in the policy was misleading.

Objective 4 and the relevant policies referred to the fact that Local Planning Authorities would be required to assess the impact of any proposed developments. One respondent made the point that in the cases where planning permission was not needed, Authorities were not able to assess or manage developments in any way – the only way of ensuring this was through Article 4 and it was suggested that that should be clearly stated in the policy.

Under current Planning legislation, Local Authorities were required to consult Welsh Ministers where a development is likely to have an impact the Outstanding Universal Value of a World Heritage Site. It was suggested that the Management Plan should elaborate on circumstances whereby they would need to consult Ministers.

A further suggestion was the inclusion of Welsh language in Objective 2 rather than just in the “development of policies” and that consideration could be given to develop volunteering opportunities for Welsh speakers or specific events to promote the Welsh language within the site, with a sufficient number of bilingual staff.

One respondent suggested the demolition of both the former St David’s Hotel in Harlech and the former accommodation block as these “derelict and dangerous buildings blight the World Heritage Site.” Supporting the development of volume serviced accommodation on the Coleg Harlech site was suggested, including the Grade II* listed building, Wern Fawr. It was thought that Partnership with the Royal St David’s Golf Club would also strengthen its viability. It was felt to be essential that these sites, within the essential setting and significant views of the Castle were prevented from becoming derelict and causing further blight. It was also suggested that parking in the lower part of Harlech Town should be increased with the provision of Park and Ride linking to the Castle. There was also a long-term aspiration for developing a cliff lift as a permanent link between Lower and Upper Harlech.

Another respondent said that there needed to be a breakdown of who was involved under each “responsibility” which would be useful. Measurable outcomes needed to be clarified as some of them did not appear to relate to anything. There was also a call to include an action to review the action plan itself and consideration was needed to the inclusion of public and businesses in the responsibility of several of the actions. This respondent also went on to say that in terms of tourism, the action plan was generally weak and needed more detail with the benefits/impact of each of the actions so that stakeholders could get a sense of priority and understanding as to why the actions were being undertaken. One Local Authority also suggested adding certain sections from its Management Plan for conservation areas to the WHS Management Plan.

Q06: Are the monitoring indicators suitable and will they help provide a robust framework to help assess progress of management arrangements?

Most of the respondents thought that the monitoring indicators were suitable and would help provide a robust framework to help assess progress of the management arrangements.

One respondent was content subject to clarification of governance, implementation and monitoring arrangements and any additional indicators that might be necessary.

Another agreed that the indicators were suitable but that the governance issues as to who was responsible for implementation needed strengthening. It was felt that the lack of detail on current condition of the site and the efficiency of the existing measures for planning control weakened this section. To remedy this, the inclusion of some detail of the 2016 Quinquennial Inspection of the WHS on the current condition of the site was suggested. There was no reference to the QI report etc and as such the Steering Group had no means of knowing what was required and whether actions were carried out satisfactorily.

It was also mentioned that the Buildings at Risk and Monuments at Risk Registers were not included which made their degree of seriousness impossible to assess as well as methods of dealing with them.

One respondent referred to some points made in one of the stakeholder consultation events where it was said that it would be helpful to have milestones built into the document to review the relevance of the document – perhaps at 3 and 7 years – taking into account progress against current objectives but also the continued relevance of the objectives and the document as a whole.

Q07: We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

There were some comprehensive comments made in response to this section of the consultation document. A summary of the main points were as follows:

- It would be helpful to include a reference to the requirements of paragraph 172 of the *Operational Guidelines for the Implementation of the World Heritage Convention* in the Safeguarding World Heritage part of Section 4.
- A reference in the Plan to the Slate Quarries which have been nominated as a World Heritage Site to reinforce the importance of heritage to the economy and communities of north west Wales would be welcomed.
- The Natural Environment Section seemed confused, with references to Historic Landscapes, which are not natural environment designations.
- ?[One respondent said that the entrance facilities to Conwy Castle were very limited and that cruise ship visitors were usually on a tight schedule and ticketing etc needed to be swifter and toilet facilities enhanced].
- The use of Article 4 Directions should be considered in relation to lower Harlech given that the Upper town was included in the Conservation Area and therefore protected.
- Signage at Harlech needed to be improved and, in the long-term, there needed to be encouragement of greater use of sustainable transport to the site.
- Suggestion to specifically reference Coleg Harlech / Wern Fawr at Section 58 of the Character Statement as one of the prime UK examples of “Arts and Crafts country house architecture”.
- There was a comment about the “detattification” of the surroundings of the castles – it was acknowledged that some progress had been made but more work was needed.
- One respondent was making an enquiry into a possible columbarium at Caernarfon Castle.

- One comment about essential setting and it being totally unexplained or defined in the draft as to what particular developments and changes in land use were being referred to.
- All organisations involved required ISO 9001 including the government.
- One respondent felt that a broader approach to setting and views should be adopted particularly in relation to Caernarfon. The designation of a buffer zone was not considered appropriate in Caernarfon where the setting of the Castle is so closely integrated with the physical, cultural and economic fabric of the town as a whole. There were also some inaccuracies to be verified in the narrative description of the context of the WHS in Chapter 3.
- Another respondent said that Gwynedd Council had recently drafted, with the support of a local steering group, a marketing plan for Caernarfon as a key output from Gwynedd's Destination Management Plan. Branding and promotion of the WHS should be seen to be integrated with this initiative.
- There was a comment about there being many links between Objectives 7 – 11 that should be developed into an overarching strategy and co-ordinated programme and that the approach to regeneration in Caernarfon by Urban Splash should be integrated with this management plan.
- Investment by Cadw (along the lines of the support for the Weeping Window) would be an essential requirement in developing Caernarfon Castle as a strategic visitor attraction.

List of Respondents*

- Harlech a'r Cylch
- Wales Official Tourist Guide Association
- Historic England
- Gwynedd Council
- Conwy County Borough Council
- ICOMOS
- Gwynedd Archaeological Trust
- Caernarfon Harbour Trust
- Isle of Anglesey County Council

**The above do not include those who wish to be kept anonymous or confidential*