

Heritage Team
DCMS
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18 December 2018

Dear Madam/Sir,

I am writing to you on behalf of the Chartered Institute for Archaeologists (CifA) and Council for British Archaeology (CBA) in response to the call for evidence as part of the Designated Landscapes Review. We are delighted that this review has been commissioned, 70 years after the first national Parks legislation was passed, and that the manner of the Review is one which intends to celebrate the successes, and improve these fabulous national assets, where opportunities exist.

Our position is based upon our experience as national bodies working to enhance the value that archaeology brings to society through, respectively in our two organisations, raising standards and promoting professionalism in the archaeological workforce, and championing the public interest in archaeology with government.

National Parks are, of course, those landscapes with which the most visceral and obvious connections with our heritage, archaeology, and landscapes exist. They are, perhaps, our most valued landscapes. We are interested in the whole of the UK for its archaeological interest, for how this blanket of heritage covers every area, whether designated or undesignated. However, we see the National Parks as a fantastic way to highlight how special places can be to people, and for National Park Authorities to lead in terms of managing and preserving that heritage.

Our response focusses on the successes of this model, the role of the authorities involved in managing it, and the range of ways in which we believe that a greater focus on integrating the management of the historic and natural environment with land management and local development needs could be achieved. We also propose that AONBs have their name changed to recognise that these areas are not solely designated for natural beauty, but rather for their beauty as cultural landscapes, which bear the indelible marks of human interaction over millennia.

About our organisations

CifA is the leading professional body representing archaeologists working in the UK and overseas. CifA promotes high professional standards and strong ethics in archaeological practice, to maximise the benefits that archaeologists bring to society, and provides a self-regulatory quality assurance framework for the sector and those it serves.

CIfA has over 3,600 members and more than 80 registered practices across the United Kingdom. Its members work in all branches of the discipline: heritage management, planning advice, excavation, finds and environmental study, buildings recording, underwater and aerial archaeology, museums, conservation, survey, research and development, teaching and liaison with the community, industry and the commercial and financial sectors.

CBA is the national amenity society concerned with protection of the archaeological interest in heritage assets. CBA has a membership of 620 heritage organisations who, together with our thousands of members, represent national and local bodies encompassing state, local government, professional, academic, museum and voluntary sectors.

Questions:

Part 1 - Opening thoughts

We would like any opening thoughts on the role played by National Parks and AONBs - you may want to make a more detailed suggestion further on.

7. What do you think works overall about the present system of National Parks and AONBs in England? Add any points that apply specifically to only National Parks or AONBs.

8. What do you think does not work overall about the system and might be changed? Add any points that apply specifically to National Parks or AONBs.

Generally speaking, we have some concerns that designated landscapes, like other forms of designation, have a negative consequence of giving the false impression that any area of place which is not subject to a designation is devoid of value.

The European Landscape Convention states that ...

This is the case for a variety of designated assets, such as scheduled monuments.

It is possible that National Parks and AONBs could take a greater role in influencing or driving good practice outside its designated boundaries. We consider that this could be done in a number of ways:

- Greater influence over extended 'buffer' areas: Some areas are somewhat arbitrarily located just outside the designated boundary of a National Park or AONB. While observable character and local value of that landscape may be indistinguishable, important differences in approach to conservation and management may be apparent. We would like to see greater extension of influence of NPAs or greater scope for larger geographical areas to come under the influence of NP and AONB management principles.
- Greater use of NPAs and AONBs to test policies for wider use. E.g. pilot schemes for environmental land management, heritage restoration, etc. (e.g. Historic Farm Buildings Repair Grant pilot).

- Greater use of influence to spread the principles of informed conservation, sustainable management, and the importance of the natural and historic environment and its heritage.

Part 2 - Views

9. What views do you have about the role National Parks and AONBs play in nature conservation and biodiversity?

a) Could they do more to enhance our wildlife and support the recovery of our natural habitats?

10. What views do you have about the role National Parks and AONBs play in shaping landscape and beauty, or protecting cultural heritage?

...

National Parks are an important aspect of the protection for cultural heritage within their areas.

- National Park Authorities as islands of resource
- More care taken over development control
- Greater retention of local community specialists, etc.

11. What views do you have about the role National Parks and AONBs play in working with farmers and land managers and how might this change as the current system of farm payments is reformed?

12. What views do you have about the role National Parks and AONBs play in supporting and managing access and recreation?

13. What views do you have about the way National Park and AONB authorities affect people who live and work in their areas?

a) Are they properly supporting them and what could be done differently?

14. What views do you have on the role National Park and AONB authorities play on housing and transport in their areas?

No comment.

Part 3 - Current ways of working

15. What views do you have on the way they are governed individually at the moment? Is it effective or does it need to change, if so, how?

16. What views do you have on whether they work collectively at the moment, for instance to share goals, encourage interest and involvement by the public and other organisations?

17. What views do you have on their efforts to involve people from all parts of society, to encourage volunteering and improve health and well-being?

18. What views do you have on the way they are funded and how this might change?

19. What views do you have on the process of designation - which means the way boundaries are defined and changed?

20. What views do you have on whether areas should be given new designations? For instance, the creation of new National Parks or AONBs, or new types of designations for marine areas, urban landscapes or those near built-up areas

...

We would be strongly in favour of adapting forms of marine designation which are capable of recognising the marine historic environment. Currently there are limited options for the designation of individual sites, including wrecks, and to designate scheduled monuments (although Historic England does not routinely do this).

As previously mentioned, we do agree that confining so narrowly the benefits of nationally designated landscapes reinforces a perception that other landscapes have no value. This could not be further from the truth. We would be interested to hear of any proposals to develop designations based on landscape quality in or near urban areas – where once again, balances of design, amenity, culture and nature all combine to create characterful and beautiful places which are valued by people.

However, we would also be interested in ideas which sought to embed fundamental logic of valued landscapes into wider thinking that could apply everywhere. We would strongly support the Review if it were to develop lessons learned from the National Park movement and how it has been so successful in creating better places to live, work, and visit, and use this

to influence wider policies for place-making and for the valuation of landscapes, townscales, and seascapes. In summary, we support a holistic approach to valuing and managing landscapes and would be extremely pleased to assist the review in developing such a system.

21. Are there lessons that might be learnt from the way designated landscapes work in other parts of the United Kingdom, or abroad?

No comment?

Part 4 - Closing thoughts

22. Do you think the terms currently used are the right ones? Would you suggest an alternative title for AONBs, for instance and if so what?

We would like to propose that the title for AONBs be changed to an alternate title which recognises the cultural value, as this is inseparable from the natural, and in almost all cases, has a huge influence of the past, present, and future of designated landscapes.

Our suggestion is;

- Area of Outstanding National Beauty
- National Area of Outstanding Beauty (NOAB)
- Area of Outstanding Landscape Value (AOLV)

We feel that we have a strong case in requesting a name change which would recognise the cultural value of these designated landscapes. The reality is that none of the UK's AONBs are natural – they all, without exception, bear the marks of human interaction over past millennia. Indeed, many are almost wholly shaped by humankind, whether through centuries of agriculture and habitation which have.

Take, for example, the designated AONB the Howardian Hills in North Yorkshire. This landscape is designated because of its rolling hills, and its unique geology, but largely, because of the carefully managed agricultural landscape and historic influence of the Castle Howard Estate, with its impressive architecture visually dominating the landscape in a highly designed fashion, and its managed estate villages imparting an impression of idyllic rural character which would be familiar with any who ever received a picture postcard of the English countryside.

The connection between this culture and nature is, of course, vital. But in the past, government policy has far too often divided these two inseparable bedfellows in the valuation and management of our landscapes.

We feel that this review presents the perfect opportunity to redefine the understanding of AONBs, not as 'natural' landscapes, frozen in time, or free from the pressures of developmental or agricultural demands, but rather created, managed, and maintained by us for present and future generations, and recognising that this connection stretches back into

the distant past, leaving remnants which add value and richness to the heritage of the landscape today.

One clear way to send this message would be through changing the name of AONBs to clearly recognise and include cultural heritage in the designation.

23. The review has been asked to consider how designated landscapes work with other designations such as National Trails, Sites of Special Scientific Interest (SSSIs), Special Areas of Conservation (SACs), National Nature Reserves (NNRs) and Special Protected Areas (SPAs). Do you have any thoughts on how these relationships work and whether they could be improved?

24. Do you have any other points you would like to make that are not covered above?

Yours sincerely,



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