

Government Response to the Landscapes Review

April 2022

The [Heritage Alliance](http://www.heritagealliance.org.uk) is England's coalition of independent heritage interests. We unite more than 170 organisations, which together have over seven million members, volunteers, trustees and staff. We sit on the Government's Heritage Council and on the sector's Historic Environment Forum.

Our heritage is one of our greatest national assets. It creates vibrant places and defines our towns, cities, countryside, and coasts, encouraging inbound tourism, uniting and levelling up communities, and enhancing our nation's soft power internationally. It tells our stories as a nation, supporting social cohesion, rootedness and identity. Heritage drives beneficial change, contributing to our well-being, enhancing biodiversity and supporting long-term environmental sustainability.

6. Should a strengthened first purpose of protected landscapes follow the proposals set out in Chapter 2?

Unsure

Please give reasons for your answer:

The existing first purpose of national parks is 'Conserve and enhance the natural beauty, wildlife and cultural heritage'. There is strong concern across the heritage sector that cultural heritage is not included in the 'strengthening' of the first purpose. We strongly suggest that the text 'conserving and enhancing the natural beauty, wildlife and cultural heritage' is retained in the first purpose.

7. Which other priorities should be reflected in a strengthened first purpose e.g. climate, cultural heritage?

Please give us your views:

The Heritage Alliance strongly advises Government to reflect cultural heritage as a priority in the first purpose, and to ensure that all other priorities factor in the impact they will have on cultural heritage. Protected landscapes are characterised by 66,000 listed buildings, 9,000 scheduled monuments and more than 360 registered parks and gardens. Heritage also includes archaeology, earth works and other sites without structure, as well as important marine heritage, such as protected wrecks. Heritage delivers for biodiversity and provides a focus for nature-based solutions.

As mentioned above, the first purpose currently already includes cultural heritage, and it is vital that any 'strengthened first purpose' continues to include cultural heritage. This reflects the Government's own response, which emphasises the equal footing of natural and cultural heritage. It is important that we stress that natural and cultural heritage are inseparable and interdependent. Dividing them is artificial and counterproductive for promoting sustainable development.

The Government response proposes that natural capital assessments should be included to capture the societal value of nature in our protected landscapes. The Heritage Alliance believes that protected Landscapes should champion the multi-capital approach as it is much more in keeping with the broader remit of these landscapes - covering natural, human, social, cultural and financial capitals.

In the Glover Report and the Government's response there appears to be a lack of understanding of what cultural heritage is and this limits the clear articulation of the societal benefits cultural heritage provides and undervalues these benefits. Indeed, The Heritage Alliance and others have made continued representations to DEFRA and DCMS about the full breadth and impact that cultural heritage has. This includes the work that The Heritage Alliance and many members are doing with DCMS to develop the cultural heritage capital approach, to ensure that the full value of culture and heritage can properly be measured as much as possible, in the same way that natural capital measures the benefits from nature. Across the sector, however, there is still a feeling that there is a lack of understanding of cultural heritage, which stems from a dearth of research and from an underdeveloped conceptualisation of what constitutes the environment.

More complete research to understand cultural heritage enables one to properly measure it; if it cannot be measured, then it is not possible to maximise the economic, social and environmental benefits to society.

This confused conceptualisation of cultural heritage is manifest in the descriptions of the interrelationships between nature and culture in both documents. For example in the Government response (p16) a new concept "historic heritage" is introduced which is not defined or even discussed by Glover.

The Government's approach would benefit from the integration of the concept of biological cultural heritage (defined as the biological manifestations of culture, reflecting indirect or intentional effects or domesticated landscapes). This would encompass all the habitats associated with high nature value farming systems that dominate the majority of Protected Landscapes. This would place nature and culture at the centre of our Protected Landscapes

With a strengthened first purpose that reflects the interconnectedness of cultural heritage, natural heritage and economic value, work on other priorities will be strengthened and more effective. This will help Government devise strategies that have a net positive impact on nature, the built environment and the population. 30 by 30 is a good example of this; in its current form, it is a strategy which is likely to result in and promote significant landscape change.

Given that these are designated landscapes that much change is likely to be unpalatable to many. So, community engagement and understanding is key here but also will need to be addressed through tourism as the landscapes people want to visit will change either through implementing LNRS or through climate change and likely a combination of both.

We welcome a standard set of purposes for National Parks and AONBs and the proposed National Landscape Strategy. The standard purposes would then formally allow the management of the cultural heritage in AONBs. It is important that the heritage sector is involved in the development of the National Landscape Strategy, via Historic England. To assist with clarity and understanding around the updated and standard set of statutory purposes for National Parks and AONBs, The Heritage Alliance suggests that the NERC 2006 definition of natural beauty as it relates to cultural heritage is formally clarified, along with the formal definition of cultural heritage. We also suggest that the any cultural heritage definition should also include reference to intangible heritage, given the work taking place on the UNESCO Convention on Intangible Heritage.

9. Do you have any views or supporting evidence you would like to input as we develop the role of protected landscapes in the new environmental land management schemes?

Please give us your views:

The Heritage Alliance is deeply concerned about the neglect of cultural heritage in proposals 2 and 3. There is a need to commission research to identify opportunities for adapting landscapes and to maximise opportunities for integrated delivery. This research should also inform priorities for action, and should be part of the strengthened management plans. Otherwise there will be devastating unintended consequences for heritage, and the full potential for nature recovery and climate change mitigation will not be realised. The 25 year plan includes heritage, and so reporting against the targets set by that plan will not be complete if built heritage is not included.

Archaeological sites, traditional farm buildings and the landscape they sit in are the only evidence we have for much of human history. Historic features are fundamental to the diversity, fascination and attractiveness of the countryside. Archaeological sites, traditional buildings and other historic features are fragile and irreplaceable.

Current Agri-Environment Schemes comprise a bespoke set of historic environment management options and restoration capital items to encourage integrated land management delivery that results in the best possible long-term management of this fragile resource.

ELMS must continue to provide the opportunity to maintain archaeological sites and traditional farm buildings and to conserve the character of farmland for future generations. ELMS need to include heritage, especially in protected landscapes.

22. Should statutory duties be strengthened so that they are given greater weight when exercising public functions?

Yes

Please give reasons for your answer:

Economic use is vital to the survival of heritage and landscapes, which cannot survive without a use and (directly or indirectly) a flow of income to cover their maintenance costs. In theory this is already acknowledged in the longstanding duty of National Parks “to foster the socio-economic wellbeing of communities”, but as Glover (p109) observes, this is inconsistently applied by National Parks in practice.

Heritage Alliance members strongly supported the recommendation in Glover to upgrade this duty to a third statutory purpose. Many landscapes and heritage assets are expensive to maintain, and there has been frustration from some members of The Heritage Alliance that attempts to generate viable (new) income streams for their maintenance are rejected by National Parks as planning authorities. For example, many traditional farm buildings are at risk and underused as there is still a tendency for planning authorities to reject re-use plans. Historic England has produced clear guidance on this, ‘Adapting Traditional Farm Buildings Guidance 2017’.

If Government do not make this 'duty to foster' a third statutory purpose, it would be sensible at least to give this “great weight” in decisions, the same weight as the first two statutory purposes (and the same weight that heritage is given in the planning system under the NPPF). This will then also further the first statutory purpose, which includes the need to concerns and enhance ‘cultural heritage and landscapes (‘natural beauty’).

23. Should statutory duties be made clearer with regards to the role of public bodies in preparing and implementing management plans?

Yes

Please give reasons for your answer:

It is important that statutory duties are made clearer, so that any National Park or AONB Management plans integrate heritage and account for the wider environmental outcomes which designated landscapes provide.

25. If you have any further comments on any of the proposals in this document, please include them here.

Please give us your views:

As previously mentioned, it is important that the value of the historic environment is properly calculated. This will be hugely useful in many ways already listed above, but also for work on net zero and commercial opportunities.

It is also the narrative which places landscape in its context and should be a vital component of any commercial strategy; it would in theory allow for credit to go to any elements of the historic environment which are included in landscape restoration projects.

Finally, it is crucial that the proposals made following this consultation are appropriately resourced to ensure delivery.

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