



ENGLISH HERITAGE

Tina Blandford
Defra,
Zone 1/03,
Temple Quay House,
2 The Square,
Temple Quay
Bristol
BS1 6EB

Dear Tina,

Consultation on the English National Parks & the Broads Draft Circular Revision A response by English Heritage, January 2010

English Heritage is the Government's statutory adviser on the historic environment. Our role is to champion and care for the historic environment which we do by:

- Improving understanding of the past through research and study
- Providing conservation grants, advisory and education services
- Identifying and helping to protect buildings and archaeological sites of national importance
- Maintaining over 400 historic properties and making them accessible to the broadest possible public audience
- Maintaining the National Monuments Record as the central publicly accessible archive for the historic environment in England.

General Comments

English Heritage welcomes the opportunity to comment on this Draft Circular consultation and is grateful for earlier opportunities to engage with the process.

We welcome the strategic nature of the document. We especially welcome the inclusion of specific sections on 'Landscape, heritage and improving the quality of place' (section 7.5) and English Heritage (section 9.3) in the Draft Circular. We are pleased to see the increased references to the cultural heritage in National Parks at various stages throughout the document. We feel that this better reflects the statutory purposes of the parks than previous iterations of the draft circular.

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In considering the application of this Circular to our circumstances, we have put particular emphasis on matters that relate to our remit as the Government's statutory adviser on the historic environment and we will pay less or no reference to matters that lie beyond our specific competence.

Specific Comments

Paragraph 22: refers to one study relating to the economic benefits of National Parks, but does not refer to more recent studies undertaken by English Heritage, Defra and the Lake District and Yorkshire Dales National Parks which we feel are important and relevant. Details of the [Building Value: Public benefits of historic farm building repair in the Lake District](http://www.helm.org.uk/server/show/nav.19624) can be found at <http://www.helm.org.uk/server/show/nav.19624> and [Building Value: Public benefits of historic farm building and drystone wall repairs in the Yorkshire Dales National Park](http://www.helm.org.uk/upload/pdf/Building-Value3.pdf?1262798848) at <http://www.helm.org.uk/upload/pdf/Building-Value3.pdf?1262798848>.

Paragraph 23-26 (Vision for National Parks): We welcome the ambitious Vision for the English National Parks and, in particular the acknowledgment to the importance of the historic environment. The consultation asked for comments on how the Vision can be achieved. At present the Vision sets high level aspirations, in order to comment in greater detail on the achievability we would like to see an action plan developed. This will detail the targets and the proposed measures to deliver them.

Paragraph 29: We welcome the reference to the Sandford Principle within the Draft Circular, but feel the current wording is too passive. We would like to see an expanded statement within the document containing a more explicit re-assertion of the Principle's continuing importance in terms of National Parks priorities.

Paragraph 35: We welcome the promotion of opportunities for the understanding and enjoyment of the special qualities of the Parks by the public. In order to reflect the all of the special qualities of the National Parks we would like to suggest that the second sentence is amended to read '...the special qualities of their Park, including those associated with their rich cultural heritage, wide open spaces and the sense of relative wildness and tranquillity that Parks offer.'

Paragraph 46: The history of the Broads is marked by the influence of humans on the landscape with peat digging on a massive scale helping to form the area valued today. To reflect this influence we would like to propose an amendment to the first sentence of the paragraph as follows, 'The open waters are a key component of the landscape and a valuable economic asset but they are not a natural system and their maintenance is difficult and often expensive, given.....'

Paragraph 81: We welcome the references to the European Landscape Convention. However, we would like to see the Circular express an expectation that the National Parks will produce ELC Action Plans as part of the Implementation Framework.



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Paragraph 97 & 98: We welcome the insertion of these paragraphs within the Circular document, including suggested wording from English Heritage. Having had longer to consider the wording in detail, however, we would like to suggest that the fourth sentence of paragraph 97 is amended to read as follows ‘...Parks are a vital source of some of the minerals that society and the economy needs and that continuing access to certain building stone from small quarries is required to sustain the character of the local built heritage.’

Yours sincerely,



Sarah Tunnicliffe
Rural & Environmental Policy Adviser
English Heritage



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