

SCOTTISH NATURAL HERITAGE CONSULTATION ON PROPOSED GUIDANCE ON LOCAL LANDSCAPE DESIGNATIONS

Response from the Historic Environment Advisory Council for Scotland

The Historic Environment Advisory Council for Scotland (HEACS) is grateful for the opportunity to comment on potential new guidance on local landscape designation.

HEACS was established in June 2003 to advise Scottish Ministers on all aspects relating to the historic environment. How the historic environment is built into new thinking on landscape policy, priority and funding is an important consideration for the Council.

In the past year we have been able to comment on various consultations from SNH on Scotland's Future Landscapes, Forestry Commission Scotland on a review of their land management, and the Scottish Executive on CAP Reform. All seem to us to fail to address the concept that Scotland's current landscape has evolved over millennia, and that in the today's landscape there are many echoes of that past. These can and should be recognised not simply by designation but a deeper understanding and management of the changes that are likely to arise in the future in a comprehensive manner. It is with this context that the paper on Local Landscape designation is considered.

As both the proposed guidance and the attached questions are framed very much towards answers from local authorities, our response is not structured around the questions, rather we have sought to raise generic issues raised by the text.

There are four key concerns.

1. As noted above, over the last twelve months several important papers have emerged that will impact on the future of Scotland's landscape, particularly the consultation on Scotland's Future Landscape by SNH earlier this year. These consultations are further explorations of issues previously raised by earlier consultation on National Scenic Areas (and in this case not formally reported) and on the large assemblage of material prepared by SNH on Natural Heritage Futures, published in 2002. It seems to us perverse that detailed prescriptive measures on local landscape designation are prepared before the conclusion to the wider strategic debate on the nature and shape of Scotland's overall landscape policy and future direction. **HEACS strongly recommends this previous important debate be concluded before any detailed proposals are made on local designation.**
2. There is clearly a debate to be had between an all-landscape approach and the role of local landscape designation. Whilst the text seeks to explain both, and both are reasonably well articulated, the inter-relationship is not really explored in any detail. The guidance thus leaves the reader unclear. The balance between the concepts of landscape characterisation as exemplified by SNH's Landscape Character Assessment Programme and local area designation are fundamentally different. It is noted that some Councils

responded they had already moved to characterisation rather than designation. In the circumstances it again seems this guidance has been issued prior to the formulation of national policy on an all-landscape approach and if/how it should be managed. This seems to us to offer a much more flexible approach to protecting the landscape, yet there has been limited recent national debate on this issue. **Again, HEACS recommends that before setting out to deal with local agendas consideration be given to the options for landscape protection at a national level offered by an all-landscape approach.**

3. Notwithstanding the general comments about the document, HEACS is particularly concerned about the lack of meaningful advice on the mechanisms for protecting the historic environment as part of the overall debate. As noted earlier we are concerned there is a lack of understanding about the time depth within landscapes and how that is exemplified. Although references are contained within the text and the table in para. 3-4 makes reference to “cultural” landscape qualities this is focused largely on sites. This misses the point of the subtlety of the historic environment and its all encompassing nature. A final reference to consulting with Historic Scotland (HS) is far from adequate. Clearly discussion has come some way through the Charter between SNH and Historic Scotland but further work needs to be done – particularly as the publication by HS/RCAHMS of PASTmap clearly puts landscape characterisation to the fore. Despite our concerns over the lack of strategic direction and the necessity of an integrated approach indicated in points (1) and (2) we feel that more advice on this subject should be forthcoming in any further text issued. **HEACS would therefore recommend that a clear statement of intent should be included in any guidance issued about the significance of the historic environment and methodologies explored on how best it should be built into management techniques and the development of designations.**
4. Finally there is a concern over education, skills and training of suitably qualified staff in local government capable of doing the work necessary, or of the necessary financial resources to resolve this issue. Our experience would suggest there are likely to be many Councils who do not have these specialist skills to deal with the complexities of future landscape management and indeed understand the deeper influences of historic environment and we are seeking to address this latter issue separately. **In the interim, HEACS would recommend that if this guidance is issued in this current form a series of seminars exploring various techniques for landscape designation is developed – and this should be done in close consultation with Historic Scotland.**