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SHEP on Battlefields
Historic Scotland
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By email and post

28th July 2008

Dear Sirs

Consultation response: SHEP on Historic Battlefields

Thank you for consulting the Built Environment Forum Scotland (BEFS) on the above consultation. BEFS is a forum that brings together 28 non-governmental organisations – both professional and voluntary – that work within the built environment sector. A unique aspect about the membership is that it includes both voluntary sector organisations and professional institutes. In addition, BEFS aims to bring together in one forum representative organisations from both the contemporary and historic built environment sectors. The purpose of BEFS is to raise awareness of policy issues within the sector, encourage debate and share information, with a view to influencing policy and legislation.

This response is supported by the undersigned Members and Subscribers of BEFS. During the consultation period BEFS also facilitated a workshop on the consultation document – the report from this workshop, which was attended by individuals from BEFS member and other stakeholder organisations, is enclosed. It can also be viewed on the BEFS website at www.befsf.org.uk/latest.

Q1 Do you agree that a policy for the protection and sustainable management of historic battlefields is necessary? If not, what alternative course of action would you suggest, and why?

Yes a policy is necessary. Currently battlefields are simply treated as 'unscheduled' archaeology and this has long been recognised as a problem in that they are not afforded any particular form of protection. As a type of cultural landscape, battlefields should be recognised and managed as an entity of value in their own right.

Q2 Do you agree with the scope and definition? If not, what changes would you propose and why?

The proposed scope and definition of a battlefield is characterised by size of the battle (500+ combatants) and the involvement of military forces deployed in battle array. Other types of conflict are not included. In responding to this question, it is argued that the scope of what might be described as a battle should take into account wider contextual issues. The size of a particular event should not preclude the significance of that event being recognised if it was part of a larger initiative. Many battles were smaller clan battles, or events that had some greater significance when taken as a collective group, or other types of conflict such as sieges that had significant historical implications. It may be appropriate, in defining what constitutes a battle, to focus less on scale and more on the significance of the implications arising from the event.

Q3 Are there other reasons for valuing battlefields that should also be considered?

The policy statement should place strong emphasis on the fact that battlefields are particularly emotive places – as the place in which conflict occurred, the intangible associations are strong. Even where no physical remains are present, or where the site has been developed, people still value these places as being the location where our ancestors fell in combat. Battlefields have a range of wider values such as tourism, genealogy, nature conservation and biodiversity, which this document could usefully identify. This would help strengthen the relevance of battlefields to other policy areas and funding sources.

Q4 Do you support the proposal to create a non-statutory Inventory of nationally important battlefields? If not, what alternative approaches should be considered?

The concern with the proposed non-statutory status is that it will be inadequate in terms of providing the ‘teeth’ need to effectively manage change in a development context. However, it is understood that strength would come via secondary legislation, with battlefields being treated as a ‘material consideration’ within the planning system. On this basis, there is support for creation of a non-statutory Inventory.

Q5 Should an Inventory of Historic Battlefields be given the same status currently enjoyed by Gardens and Designed Landscapes within the planning system?

In the absence of statutory recognition, the Inventory of Historic Battlefields should be given at least the same status as currently enjoyed by Gardens and Designed Landscapes within the planning system.

Q6 Do you agree with the purpose of the proposed Inventory? If not, what changes would you suggest and why?

The proposed purpose; to identify sites of national importance; to raise awareness of battlefields and their need for protection, to provide information as a basis for the sustainable management of change, and to act as a resource for interpretation,

education and research, seems appropriate (although refer to comments at question 2 on the significance of non-national events). It would be useful if the policy document could elaborate on what is meant by the term 'national importance', as many battles took place at what would now be considered a regional level but were important in shaping the 'nation' that was formed later. To be effective in informing 'the sustainable management of change', the Inventory should both flag elements of value and also begin to develop key management objectives for each site.

Q7 Do you believe that the criteria set out in Annex A are suitable? If not, what alternative criteria would you suggest and why?

The criteria listed at Annex A are important and should be highlighted more in the content of the main document. The criterion of having a 'clear landscape context' should be included on an 'and/or' basis. This aligns with the particular intangible qualities that battlefields have – so that even in the absence of physical remains, a battlefield would still be capable of being included in the Inventory.

Q8 Do you agree with the proposed definition of the area of interest? If not, what changes would you suggest and why?

In defining the area of a battle, it should be recognised that even on sites that have been heavily developed, there is still potential for evidence and finds to be uncovered on a piecemeal basis. Again, there should be recognition of the intangible values associated with the place as the location of the event (this runs counter to the proposal at paragraph 5.7 which proposes that a battlefield would be excluded if the landscape had been so heavily disturbed that it is no longer possible to understand the events in context).

Q9 Do you agree that policies are needed for both the overall area of the battlefield and specific areas within it? If not, what changes would you suggest and why?

It is anticipated that different approaches will be taken in 'core' as opposed to 'peripheral' areas – it would be useful to have further consultation on the management approaches adopted in different areas, and in response to different types of development. It may be that a battlefield has multiple cores within a wider peripheral 'envelope'.

While precisely defining the area of a battle can be tricky, it is acknowledged that a 'firm lines' rather than 'dotted lines' approach is necessary if the Inventory is to be a useful tool in informing planning decisions.

Q10 Do you agree that best practice guidance would be useful? If so, who should lead in developing this? If not, what alternative approaches should be considered?

Best practice guidance would be welcome; Historic Scotland should lead in collaboration with stakeholders. The process of defining sites for inclusion in an Inventory could be taken further to form the basis of a framework of guidance, with case study material.

Q11 Do you agree with the roles identified here? If not, what changes would you propose, and why? Are there other key stakeholders who have significant roles to play?

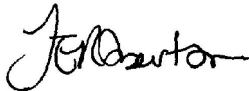
The local community, special interest groups, local trusts etc represent key stakeholders that should be specifically identified within the policy document.

We would welcome specific resource within Historic Scotland on battlefields, as is the case for gardens and designed landscapes. This resource would provide expert guidance and support, with the benefit of national overview, to local authority archaeology, conservation, and planning officers, as well as to local communities.

In developing the Inventory we would welcome the creation of an expert panel to bring in to discussions on the content of the Inventory a range of perspectives.

I hope these comments are useful – please get in touch if you require any further clarification. I would be grateful if you could keep me informed on the outcome of this consultation process.

Yours sincerely



Jo Robertson
Forum Co-ordinator
Built Environment Forum Scotland

This response is supported by the following Members and Subscribers of the Built Environment Forum Scotland:

Members

Archaeology Scotland
Garden History Society in Scotland
Institute of Field Archaeologists – Scottish Group
National Trust for Scotland
Royal Town Planning Institute in Scotland
Society of Antiquaries of Scotland

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Enc: Workshop report