

## Draft Battlefield Conservation Management Plan Consultation

### **a) Introduction**

The following is a summary of the responses received regarding the CMP and whether those responding consider the policies are appropriate and if the actions will assist in delivering the identified policies.

The stakeholder questionnaire was tailored to seek input into whether the policy was appropriate and if the actions would assist in their delivery and the general use questionnaire sought input into whether the principle of a CMP for the Battlefield being adopted was supported and whether the actions would assist in delivering the policies.

The public questionnaire was less detailed and concentrated on the appropriateness and effectiveness of the supporting actions associated with each policy.

## b) Responses

### Independently Emailed Detailed Responses

Organisation	Date	Respondent comments	Officer response
The Wildlife Trust	28 March 2014	1) Specific, Page-referenced, comments to particular parts of the Final Draft CMP document :	
The Wildlife Trust		Page 2; the "Contents" list : first two Figures in this listing as Nos. 2.1 and 2.2 does not agree with what is elsewhere in the body of the document itself.	Reviewed and amended as appropriate
The Wildlife Trust		Page 4; Paragraph 1.1 the references made at the end of this paragraph to Figure 1.1 and Figure 1.2 are also incorrect.	Reviewed and amended as appropriate
The Wildlife Trust		Page 5; Paragraph 2.1 : For the 3rd bullet- might it be more accurate / more appropriate to say that the former course of the River Nene lies within a larger Local Nature Reserve site area.	The text has been amended to reflect this
The Wildlife Trust		Page 5; Paragraph 2.1 : nowhere in the whole of this document is there any mention of either the Nene Valley Nature Improvement Area ( NIA ) zone, which covers the majority of the Battlefield site, or the nearby Upper Nene Valley Gravel Pits Special Protection Area ( SPA ).	The NIA has been added to the list of designations and the SPA has been highlighted

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The Wildlife Trust		Page 5; Section dealing with the National Planning Policy Context : this particular Section of the document should be including some appropriate references to Biodiversity, and also other natural environment matters, and Green Infrastructure ( GI ) issues, etc., as relevant, in association with the NPPF.	<p>The purpose of the CMP is to provide a long-term framework for the conservation and management of the registered Battlefield and its biodiversity is recognised an important element of the site. There is no objection to making reference to the natural environment section of the NPPF. The following has been added to the CMP:</p> <p>Conserving and enhancing the natural environment</p> <p>Para 109: this paragraph states that the planning system should contribute to and enhance the natural and local environment by doing a range of things including:</p> <ul style="list-style-type: none"> <li>• Protecting and enhancing valued landscapes, geological conservation interests and soils, and</li> <li>• Minimising impacts on biodiversity and providing net gains in biodiversity where possible, contributing to the Government's commitment to halt the overall decline in biodiversity, including establishing coherent ecological networks that are more resilient to current and future changes.</li> </ul> <p>After para 2.14 add: The examination to the Plan completed in March 2014, following a series of Proposed Modifications. The Planning Inspector's report is expected to be published in July 2014.</p>

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The Wildlife Trust		Page 9; Paragraph 2.22 : the “Nene Meadows SPD” has now been officially adopted itself - this particular paragraph will require to be re-written / updated.	The text has been amended to reflect the recent adoption of the SPD
The Wildlife Trust		Page 11; Paragraph 2.31 : it might be more accurate / more appropriate to say here that the section of the River Nene that occurs in the Battlefield site lies within a larger, overall, Local Nature Reserve site area. In addition, in terms of the complexity of the various categories of designated site information that occurs, and overlaps, here, inside the selected red-line boundary area for the Battlefield site itself, we recommend that you re-visit your basic source information. For example, there is a Wildlife Trust Nature Reserve designation that extends further south, beyond the boundary of the Barnes Meadow LNR site area itself, which includes nature conservation inputs to an area of land lying to the south of the River Nene that is referred to as Beck’s Meadow. Also, there is a separate Barnes Meadow Local Wildlife Site ( LWS ) designated areas here as well.	Para 2.31 offers a summary of the statutory designations relevant to the site. Para 2.32 goes on to give an overview of relevant planning policy; to highlight the overlap of nature conservation issues. The recently adopted meadows SPD has been included which will assist in clarifying other designations relating to the site.
The Wildlife Trust		Page 13; Paragraph 3.3 : the vast majority of, the Barnes Meadow LNR site is actually owned by Northamptonshire County Council. Perhaps you could better refer to either the Nene Meadows SPD itself, and / or contact Ms Jane Pearman, The Wildlife Trust’s Reserves Manager in Northamptonshire, for further advice and guidance.	For clarity, ownership details have been included in the text.
The Wildlife Trust		Page 16; Paragraph 3.23 : the reference to the management of Barnes Meadow is not quite right	This paragraph has been reviewed to ensure accuracy

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The Wildlife Trust		Page 16; Paragraph 3.23 : Please note that the ( Wildlife Trust's ) Barnes Meadow Nature Reserve site area has just recently been entered into an Agri-Environment Stewardship Scheme called Higher Level Stewardship ( HLS ). Therefore, please be aware that it is these HLS-funded Management Options that will actually be governing just how this particular site area will be managed for the next 9.5 years now.	A note has been included regarding the Stewardship Scheme
The Wildlife Trust		Pages 16 and 17 : Please note that the Delapre Lake site area is designated as a Local Wildlife Site; but this does not appear to be mentioned here in this section of the document.	Noted. Delapre Lake is referenced as a Local Wildlife site in Chapter 6 Natural Environment and Chapter 7 – Character Areas.
The Wildlife Trust		Page 20 : the numbering of this particular Figure is incorrect. Please see other inaccuracies in the numbering of this series of Figures here, from 3.1 to 3.4, inclusive, and also how they ( fail to ) tally-up with the listings given in the “Contents” section.	Numbering has been checked and amended as appropriate
The Wildlife Trust		Page 49; Paragraph 6.4 : the NBRC is correctly referred to as the Northamptonshire Biodiversity Records Centre.	This has been corrected
The Wildlife Trust		Page 49; Paragraph 6.8 : the suitability of the actual date upon which it was undertaken, is not at all ideal.	Noted. The CPM identifies the limitations of carrying out habitat surveys in February.
The Wildlife Trust		Page 50; Paragraph 6.13 : every reference within this document to this category of non-statutorily designated site area should be quoted as a Local Wildlife Site ( a LWS ).	This is noted. However, it is considered unnecessary to repeat this throughout the document
The Wildlife Trust		Page 50; Paragraph 6.13 : For this description of the various relevant non-statutorily designated sites here, you may wish to also consider the benefit of distinguishing between,	A definition of each has been included.

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		explaining just what, a Local Wildlife Site ( LWS ) and a Potential Wildlife Site ( PWS ) area is.	
The Wildlife Trust		Pages 51 and 52; for Paragraphs 6.15 and 6.16 : there is an error here whereby the running-list of the order of the numbers of these Paragraphs in this particular section will need to be altered.	This is a numbering error which has been rectified throughout the chapter.
The Wildlife Trust		Page 53; part of Paragraph 6.25 : We strongly recommend the complete eradication, from any site where it is present here, of the highly-invasive and non-native shrub species called Snowberry. A similar approach should also be taken to all other similar aggressive, invasive and non-native plant species where an objective of better nett local biodiversity outcomes is being sought.	This para is descriptive of the current position, including species present. Decisions regarding the eradication of an identified species needs to be considered cohesively as part of a woodland management plan. The Battlefield CMP is not the most appropriate vehicle to consider this issue.
The Wildlife Trust		Page 53; Paragraph 6.32 : We disagree with the accuracy of this overall statement here. Firstly, why the use of the past tense “was” ? Secondly, it needs to be made clear that this is in fact a Disused Railway Line linear feature that is present in the current landscape. And, next, in any event, please note that, in our opinion, this Disused Railway Line feature actually runs along the edge of the southern boundary of the Barnes Meadow LNR site area here.	This para has been reviewed and amended to reflect this.
The Wildlife Trust		Page 54; Paragraph 6.37: needs to state Local {rather than County } Wildlife Site.	An appropriate amendment has been made
The Wildlife Trust		Page 70; Paragraph 8.23 : the LNR designated site is in fact larger than the 20 ha stated here. And / or, perhaps you would want to make clear just how much area of the overall Barnes Meadow LNR site actually lies inside the selected	The area has been amended to accord with the Nene Meadows SPD

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		red-line boundary area for the Battlefield site itself.	
The Wildlife Trust		Pages 73 to 78, inclusive; for Chapter 9 on “Issues and Opportunities” : Please note that, even at least from the point-of-view of Protected Species Matters legislation, there will need to be appropriate actions proscribed for the requirement to undertake suitable surveys for Bats and Dormouse, for example, before any tree work is started in the wooded areas. The opening-up of any given areas of these woods may well prove to be the wrong management prescription to take for the benefit Dormouse, for instance.	Noted. This principle would apply to all relevant legislative requirements.
The Wildlife Trust		Pages 73 to 78, inclusive; for Chapter 9 on “Issues and Opportunities” : Please note the following observations	
The Wildlife Trust		Whilst we do agree with the opportunities identified for both the Delapre Wood and the Barnes Meadow site areas, we do also think, however, that the latter case could be expanded upon, with more extensive and detailed proposals being recommended, and also, please note that it is a bit confusing they are both listed in Table A here, and are not in Tables G and H, respectively, instead.	The CMP is an organic document which can be expanded upon as specific projects are identified. Table A is intended as generic issues/opportunities across the site, which are supported by ‘character area’ specific issues/options. Details associated with enhancement and mitigation issues are/will be dealt with in strategic and local plans, and will also be considered further as part of the development management process. Clarifications have been added.

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The Wildlife Trust		In Table F, for the Delapre Lake LWS area, we recommend including further detailed opportunities for enhancing the habitat areas here; that is, to open-up the bankside areas, to pollard the willows, to re-profile the banks, and to generally keep the western end of the site undisturbed from recreation encroachment / pressures.	The primary purpose of the Battlefield CMP is to highlight the significance of the Registered Battlefield and its environs, rather than a biodiversity action plan.
The Wildlife Trust		Please note that for the area(s) of Semi-Improved grassland habitat that are located to the SW of the lake, there is an ideal opportunity to restore this land to a biodiverse / wildflower-rich meadow area instead.	A further opportunity has been added at F6
The Wildlife Trust		For any Ponds, the opportunity should be taken to restore them to a condition where they are much more wildlife-friendly and biodiverse.	A further opportunity has been added at D7
The Wildlife Trust		Page 80; for Overriding policy 4 : We recommend that you would need to both consider carefully and also consult appropriately in greater depth, as to the question of whether or not improving the footpath links from the Barnes Meadow LNR to Delapre Abbey would be likely to have any adverse impact on the management of the Barnes Meadow LNR site area itself ?	The concerns of the Wildlife Trust are noted. However, strengthening links with Delapre Abbey is included in Policy 30 of the adopted Central Area Action Plan which has been deemed sound and approved by a planning Inspector.

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The Wildlife Trust		Page 89; Table C on “Nature Conservation” : The actions shown in this particular section seem rather limited - we feel that there could be much more relevant references made here to the management of the LWSs / PWSs / LNRs in and around the local area, and to other habitat areas along the river corridor too. Also, this CMP could be making much more effort to improve biodiversity in areas of, current, low value.	The purpose of the Battlefield CMP is to provide a long-term framework for the conservation and management of the Northampton Battlefield as a designated heritage asset.
The Wildlife Trust		Page 93; for Entry No. 2 in this Table for Overriding policy 7 : please note that our organisation should be correctly referred to as, at least, the Northamptonshire Wildlife Trust; and, in fact, even more accurately as The Wildlife Trust for Bedfordshire, Cambridgeshire and Northamptonshire.	Noted – the text has been amended accordingly
The Wildlife Trust		In Appendix No. 4 : About halfway down the page here there is an erroneous and misleading reference made to the Kent Biodiversity Action Plan. This error must be corrected to reflect the accurate local situation.	The text has been amended accordingly.
The Wildlife Trust		In Appendix No. 6 : What Map / Plan, or other reference source, is this tabulated list of Target Note statements intended to be related to here ? Please note that, as far as we can tell, this same list of a total of 17 separate Target Notes does not appear to be annotated / represented at all on Figure 6.1, the “Phase 1 Habitat Survey” map, included at Page 57 of this same document.	This has been amended

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The Wildlife Trust		In Appendix No. 6; for the "Description" statement entry for Target Note No. 12 : Please note that there is an erroneous and misleading reference made here to the River Kennet. Not only must this specific error be corrected, or removed, as necessary, but we would also request that the accuracy and relevance of the whole content of this particular Appendix be verified as to its accuracy.	This has been corrected
		<b>2) General comments in respect of the overall content of the Final Draft CMP document :</b>	
The Wildlife Trust		Please note that, in some particular areas of the overall site, water-logging could actually be seen as a positive result – since its effects could be used to create more habitat features.	Noted
The Wildlife Trust		The CMP report needs to include a much better and more detailed appreciation of the issues facing the Barnes Meadow LNR site area, and the costs of managing this area as a component part of the overall Battlefield site.	The purpose of the Battlefield CMP is to provide a long-term framework for the conservation and management of the battlefield which will enable the battlefields significance to be sustained and enhanced
		In general, this report does not seem to understand the role and function of the organisation called the River Nene Regional Park ( RNRP ).	The role of the RNRP is very strategic, seeking to create a green infrastructure network extending from Daventry to Peterborough. The RNRP were invited to participate in the drafting of the CMP.

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		<p>The overall Battlefield Site would greatly benefit from the preparation of either a combined / over-arching / whole-site Ecological Management Plan ( an EMP ), or else a suite of complimentary, contributing, EMPs that served to cover all of the different parts of the whole Battlefield Site, which would be focussing on the key habitat areas; that is, Barnes Meadow, Delapre Lake, the 'Woods', the Semi-Improved grassland areas, and which could also set out general principles for the, currently, lower value areas.</p>	<p>There are benefits to this approach and the battlefield CMP could form part of a suite of documents to this effect. It is not the purpose of the Battlefield CMP to deliver this as a strategy. Details associated with enhancement and mitigation issues are/will be dealt with in strategic and local plans, and will also be considered further as part of the development management process.</p>
English Heritage	14 January 2014	<p>The production of a CMP for the Battlefield is a very welcome step. The Council's role in identifying appropriate management and enhancement opportunities for this nationally significant Registered Battlefield is to be applauded. The CMP follows a logical structure and appropriate expertise has been brought to bear on the subject matter.</p>	<p>Support for the document is noted.</p>

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English Heritage		<p>Chapter 4 summarises the detailed report written by Glenn Foard and Tracy Partida - 'Northampton Battlefield 1460: An Assessment'. This Assessment was a very thorough piece of research and adds much to the basic English Heritage statement of significance for the battlefield. It provides the detailed discussion and evidence that underpins and justifies statements made in the CMP. The Assessment should be added, as an appendix to the CMP and will complement Appendix 3, the Parklands Consortium landscape analysis, and Chapter 5 very well. These provide a very good characterisation of the post-battle history of the area. The inclusion of the Assessment, as an Appendix, will help convey that the significance of the battle, and the importance of understanding its place in the landscape, is at the forefront of the custodianship of the battlefield area.</p>	<p>The detailed report forms an important element of the research which informs the draft CMP and therefore there is no objection to its inclusion as an appendix. Whilst the report was commissioned to inform the CMP it would be prudent to seek the consent of the authors prior to publishing it as part of the CMP. Need electronic copy from LUC</p>
English Heritage		<p>It is also important also to recognise the known presence, and potential presence, of buried prehistoric, Roman and medieval archaeological remains within the Registered battlefield area, and within the area to the north.</p>	<p>This Draft plan was written to include the area of the nationally Registered Battlefield site. However, the brief for the CMP acknowledges that the location and boundary of the registered Battlefield is a point of discussion but made clear that it was not the remit of the CMP to review the Registered boundary. The draft CMP also acknowledges that the area between Delapre Abbey and the river has been suggested as a focus for the battle.</p>

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English Heritage		<p>Throughout the CMP there are statements that suggest that the location of the battle is unknown. It is clear that the precise location of the Lancastrian defended camp, and therefore the core of the action, has not yet been proven. However, it is also abundantly clear that according to the best available evidence, the Registered battlefield area captures much, if not all of the battlefield area, except for the rout and the possibility that the Lancastrian camp was located closer to the Nene, north of the Registered area. Certain statements in the CMP (examples below) could be misinterpreted, and I think it is very important to be absolutely clear when the CMP is referring to the battlefield as a whole and when it is referring to the Lancastrian camp.</p>	<p>For clarity and to reduce the potential for misinterpretation the draft CMP has been reviewed throughout to make clear when each is being referred to. As stated in the plan, further survey work will be required try to establish the location of the defended camp and further understand the wider battlefield area</p>

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English Heritage		<p>Although the policy and legislation that applies to the Registered Battlefield and associated heritage assets is well represented, and particularly known to those used to dealing with the planning process, I am not sure that the sensitivity of the battlefield has always been fully appreciated with those who deal with other aspects of land management. It is unfortunate that considerable damage can be done to the battlefield by well intentioned, but only partially informed, conservation initiatives such as tree planting, drainage works, levelling and repairing land damaged by vehicle movements, etc. that fall outside the planning process. A concerted effort should be made to ensure all those involved with the management of the land within the Registered Battlefield area have access to the CMP and understand the sensitivities of the site so that they can consult before undertaking potentially harmful works.</p>	<p>The Cabinet Report is proposing that the Conservation Management Plan be supported and adopted as SPD and also to inform its activities in relation to its assets and those of its tenants in day to day operational activities within the area offering a robust framework for the use and management of the landscape and ensure development and other works within the landscape.</p>
English Heritage		<p>Interpretation and access are clearly very important to the appreciation and use of the battlefield as a public amenity for Northampton, and educational and research resource. I wonder whether the Access and Interpretation initiatives presented in the CMP are quite ambitious enough to inspire and encourage support from partner and funding organisations. The opportunities provided by the Delapre Abbey HLF project and the momentum that the success of that project will generate could perhaps be exploited to create a framework within which considerable enhancements in the understanding and presentation of the battlefield might be achieved.</p>	<p>The interpretation and activity plans which support the HLF project includes provision for understanding and presentation of the Battlefield</p>

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English Heritage		I have made some detailed comments below, referencing relevant paragraph and table numbers. Some sources are missing proper references (e.g. '...detailed report written by Dr Glenn Foard...', 'Halcrow Report').	This can be checked and amended as appropriate. May need LUC input
English Heritage		Para 2.3 refers to scheduled monuments, though not battlefields - actually the NPPF provides policy for dealing with all heritage assets.	An appropriate change has been made to ensure all heritage assets are referred to.
English Heritage		Para 3.22. Do we assume Home Farm is also leased from NBC?	Yes – a change has been made clarifying this.
English Heritage		Para. 4.30. Some good interpretation is surely warranted in the battlefield area, though the detail and extent of this is perhaps a matter of discussion given the nature of the evidence. Interpretation that embraces the alternative, most probable, courses of the battle could easily be achieved.	The significance of the battlefield and the opportunities it offers as a wider visitor destination is acknowledged. There is a clear aspiration to provide interpretation for the Battlefield which needs to be appropriately targeted based on known information and co-ordinated with the interpretation plan for the HLF project at the Abbey
English Heritage		Para. 4.34. I don't think the location of the battle is in much doubt. The battle would have ranged over wide area and the registered area captures some of that. What is in some doubt is the exact location of the Lancastrian defences and the deployment of forces. This paragraph should be refined to reflect the headline findings of the Foard and Partida Assessment.	This has been updated throughout
English Heritage		Para. 4.37. Should clarify that 'systematic, archaeologically controlled metal detecting should form part of any archaeological programme of evaluation and recording...'	The text has been amended to reflect this
English Heritage		Figure 5.4. This is an excellent image to convey the presence	If this information is available and has the potential to

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		of ridge and furrow, but LIDAR image interpretation is a dynamic process and really requires a moving light source (notional sun) to highlight shadows and therefore slight earthworks. It would help to reproduce 4 LIDAR images with the light source in four different locations to highlight different facets of the earthwork landscape.	add to the report this can be included in the final document. Check with LUC if this is available
English Heritage		Paragraph 7.14. Its worth reiterating here that the exceptional survival of ridge and furrow contributes greatly to the historic illustrative value, in that nowhere else in Britain can one gain an impression of the difficult undulating agricultural terrain over which armies of this period mustered and fought. The ridge and furrow also contributes something to the aesthetic value of the landscape.	The surviving ridge and furrow is highlighted in the sections on 'evidential value' and 'aesthetic value'. This should not be seen as implying it has no Historical value.
English Heritage		Paragraph 7.17. The Eleanor Cross has a considerable aesthetic value and communal value in its own right as an important historic landmark visible and accessible to thousands. It is largely its aesthetic value that is undermined by the modern intrusions within its setting, which is covered in para. 7.21 under 'medieval landscape'.	The value of the Eleanor Cross is highlighted under historical and aesthetic value. This should not be seen as implying it has no or limited communal value.
English Heritage		Paragraph 7.24 and 7.25 could cover individual features - the Delapre Abbey house complex, the Eleanor Cross, etc. in their own right.	The purpose of the CMP is to focus on the wider historic landscape and will form part of a suite of documents including the Delapre Abbey Conservation Plan, Delapre Abbey Options Appraisal and Landscape Options Appraisal which also highlight the value and significance of these heritage assets, and are considered to be mutually supportive.

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English Heritage		Overall I think this section of the CMP and summary table 7.1 should seek to give each identified feature/element of the battlefield landscape a ranking in each of the 'values' categories. The Eleanor Cross, for example, is currently only assessed under 'evidential' and 'historical'. The grade II* abbey is not assessed under communal value. The headline themes or groupings (for example, 'medieval landscape') could be ranked as well, their level of significance effectively deriving from the combination of features, their relationships with each other, and other distinctive properties of the landscape.	Whilst there is merit in ranking elements within each 'value' area, there is a risk that this can be misleading/misinterpreted, giving the impression that some elements are more important than others. The value of the individual heritage assets and the cumulative whole are of equal importance.
English Heritage		Para. 8.13. It might be more accurate to say that The Great Lawn is considered to be the most likely location for the Lancastrian earthwork defences and the core of the battlefield.	The report identified three potential locations for the earthwork defences. However, the text has been amended to reflect the potential core of the battle.
English Heritage		Para. 8.17. There is in fact quite a lot of access to view the Paddocks area - an access road running right along one side and a footpath along another.	This has been clarified
English Heritage		Para. 8.22. It might not be stretching it too far to state that the lake and low-lying watery areas do at least give a sense of the presence of the river floodplain and the mire into which the course of the battle descended. This is also true of Barnes Meadow (character area 7).	The river flood plain can be appreciated from a number of locations within the Battlefield although it may not be possible to view the river
English Heritage		Para 9.4. (A1) The gaps in knowledge pertain to the location of the Lancastrian earthwork defences and core of the battle, not the battlefield as a whole.	The text has been amended to reflect this.
English Heritage		A2 - the 'opportunity' for Delapre Abbey and its associated	The HLF project will help deliver the first phase of the

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		structures are largely being realised through the HLF project.	wider project for Delapre Abbey and its parkland setting.
English Heritage		Para. 9.5 the wording of A8 is different in para. 9.4.	This has been amended
English Heritage		Para. 10.1. The overall strategy implies there is doubt about the location of the battle, but the doubt is largely confined to the precise location of the defences and the core of the battle.	This para offers an overview of the strategy, which incorporates policies and actions for the future management of the Registered Battlefield site as a whole and does not aim to identify the precise location of the defences. The text has been amended to address any potential for misinterpretation.
English Heritage		Para. 10.6. Potential adverse effects/harm are not limited to physical intrusion that must be assessed by an archaeologist, but also comprise effects on setting and appearance, which might require other specialists.	The potential need for a range of specialist advice is acknowledged. The text has been reviewed and amended to reflect this.
English Heritage		Table 11.1 - there is now new draft historic environment practice to support the NPPF and replace the PPS5 Practice Guide.	The text has been amended to reflect the recently published guidance
English Heritage		Page 83. It is important to reiterate that metal detecting should be prevented anywhere on the registered battlefield, unless part of an authorised programme of archaeological research under suitably qualified leadership.	This is supported by the Council and methods of prevention are being investigated. The text had been amended to reflect the need for works to the input of appropriate specialists