

# Response ID ANON-MWPZ-XA9N-E

Submitted on 2013-12-04 17:00:45.061369

## 1 What is your name?

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## 3 In what capacity are you responding to this consultation?

Organisation

**If an organisation please state which one:**

English Heritage

**4 We will summarise all responses and place this summary on our website at [www.gov.uk/defra](http://www.gov.uk/defra). This summary will include a list of organisations that responded but not people's personal names, addresses or other contact details. If you do not want your response - including your name, contact details and any other personal information - to be publicly available, please say so clearly in the box below. Please note, if your computer automatically includes a confidentiality disclaimer, that won't count as a confidentiality request. Please explain why you need to keep details confidential. We will take your reasons into account if someone asks for this information under freedom of information legislation. But, because of the law, we cannot promise that we will always be able to keep those details confidential.**

**Please explain why you need to keep details confidential:**

We are content for our response to be made public.

## 5 Are there other policies, plans and strategies or relevant legislation or regulation that you feel may be relevant to the SEA of the Rural Development Programme?

**Are there other policies, plans and strategies or relevant legislation or regulation that you feel may be relevant to the SEA of the Rural Development Programme?:**

Yes. The 1972 UNESCO Convention Concerning the Protection of the World Cultural and Natural Heritage (The World Heritage Convention) may be relevant. World Heritage Sites are defined as places of 'outstanding universal value' and are selected by the United Nations Educational, Scientific and Cultural Organisation (UNESCO). Sites can be selected because of their cultural or natural outstanding universal value (OUV). There are 17 World Heritage Sites in England, most of which have cultural OUV, and some of which include significant and characteristic rural landscapes (eg. Hadrian's Wall, Stonehenge and Avebury). Signatories to the Convention have the duty of ensuring the identification, protection, conservation, presentation and transmission to future generations of the cultural and natural heritage situated within their territory. The current RDPE has contributed to the protection and conservation of WHSs, primarily through Environmental Stewardship (particularly the highly targeted Higher Level Scheme). Given the duties placed upon signatories, and the potential for NELMS (both through the highly targeted and landscape scale delivery strands) to continue to support the conservation and management of World Heritage Sites, we suggest that this should be added to the international objectives (p.62).

In addition, the Heritage At Risk figures quoted on p.63 actually refer solely to England rather than to the UK.

Although referenced later in the document, we feel that National Character Area mapping is another strategy worthy of mention within Landscapes section (p.64). English Heritage contributed historic profiles for key landscape themes to the CQC project (mentioned later in the text) and is now contributing to Natural England's re-drafting of the NCA profiles. Each profile includes: a description of the natural and cultural features that shape our landscapes; how the landscape has changed over time; the current key drivers for ongoing change; and a broad analysis of each area's characteristics and ecosystem services. The statements of Environmental Opportunity (SEOs) within each NCA profile draw upon this integrated information and since they offer guidance on the critical issues which could help to achieve Defra and RDP priorities such as sustainable growth and a more secure environmental future, we see them as particularly relevant (see for instance: <http://www.naturalengland.org.uk/publications/nca/default.aspx>).

## 6 Do you agree that the key environmental issues affecting rural England that are relevant to the Rural Development Programme have been identified? If not, are there others which you think should be included?

**Do you agree that the key environmental issues affecting rural England that are relevant to the Rural Development Programme have been identified? If not, are there others which you think should be included?:**

We believe that the issues identified relating to the historic environment are broadly correct. However, we would like to offer the following amendments and further additions:

We would urge that Historic Farm Buildings should also be considered (p.66). Work currently being undertaken by English Heritage on mapping the historic

character and use of all traditional farmsteads is finding strong local variations in survival. English Heritage's work is based upon the recognition that – despite contributing strongly to local character and distinctiveness - many rural buildings are unlikely to be protected through designation. Similarly, there is no nationally-consistent data on the numbers which are functionally redundant and in declining condition, although English Heritage's research suggests that only around one third remain in direct agricultural usage. There are particularly severe challenges in the uplands and within protected landscapes, yet the contribution of such buildings to the character of these areas is especially significant. Environmental Stewardship has played a major role in conserving historic landscapes which make significant contributions to society and to the economy as a whole, and given the potential for traditional buildings to be conserved, re-used and adapted for business and other purposes, we would urge that the new RDP makes adequate provision for their sustainable future (see for example <http://www.english-heritage.org.uk/wmidlandsfarmsteads>).

We would observe that the ELC's definition of landscape (as quoted on p.62) makes it clear that all landscapes are doubly cultural (that is, the result of human and natural interaction which provides a framework for sustainable development, enhancement and conservation, but also the product of perceptions which change over time and as knowledge develops). On this basis, the 1990–1998 analysis for CQC (p.68) was based on an assessment of change in the countryside relative to the descriptions written for the NCAs, but it was subsequently agreed that the historical dimension for the second round of CQC analysis (1998–2003) would be threaded throughout the text in much the same way that the issue of biodiversity runs through them.

The figure on Scheduled Monuments quoted on p.69 should be revised upwards (as set out on p.71).

There is a strong correlation between some NCAs and assets on the Heritage at Risk Register (see p.71). It would be helpful to see this recognised and elaborated upon (we would be happy to provide the results of GIS analyses we have done recently on HAR assets). For example, a distribution map of Scheduled Monuments vulnerable to plough damage (11.5% of those on the Heritage at Risk Register) show that in many of the NCAs affected intense arable cropping has also led to the loss of permanent and rough grassland, and had a detrimental impact on the distinctiveness of the wider landscape. Natural England's analysis of trend data for the NCAs shows a clear shift to agricultural contractors in the Chalk and Limestone landscapes with (as recently noted in Dorset Downs and Cranborne Chase) a decline in agricultural workers and increase in farm managers. The NCAs classified as Eastern Arable, where arable agriculture has intensified over the last 200 years, have also sustained the development of increasingly large-scale arable enterprises, but also evident from the map are other areas where high numbers of medium-risk monuments are in declining condition. Particularly clear in the north-west are the Solway Basin and Eden Valley, where the the NCA profiles have noted a 30 per cent increase in arable farming since 2000.

p.73 we would suggest that it would also be helpful to consider the economic benefits of retaining historic environment assets here too, and within the Rural Economy Chapter, where the skills needed in conserving the historic environment (p.123) might be a useful addition. For example, continued maintenance and repair, aided by Environmental Stewardship grants, plays a vital role in ensuring continued and potential new uses for traditional buildings, particularly where the options for diversification are sustained by highly-valued landscapes including those within National Parks. Analyses commissioned by English Heritage and Defra have shown how repair grants have benefitted social and economic regeneration within the Lake District and Yorkshire Dales National Parks (see for instance: A Study of the Social and Economic Impacts and Benefits of Traditional Farm Building Repair and Re-use in the Lake District ESA (2005) and Building Value: Public benefits of historic farm building and drystone wall repairs in the Yorkshire Dales National Park (2007)

p.77 - Analysis of postal, land use and census data is highlighting the extent to which conversion (particularly of farm buildings) and small-scale new-build has contributing to housing growth in areas of dispersed rural settlement equivalent to that of favoured urban areas – 'leapfrogging' areas defined as urban fringe. It would be useful to reference this here. English Heritage's ongoing Future of Rural Settlement Project, commissioned from the University of Sheffield, is deepening an understanding of short and long-term drivers for change through integrating understanding of historic settlement into the Rural Urban Classifications (there is a great deal of research and literature on this aspect of work - see also Bibby, P and Brindley, P 2006. Residential Development since 2000: Report for Communities and Local Government; Bibby, P and Brindley, P 2006. Land Use Change at the Urban: Rural Fringe and in the Wider Countryside. A report prepared for The Countryside Agency, Department of Town and Regional Planning, University of Sheffield; Bibby, P. and Brindley, P. 2013. Land Use Change Indicators for Protected Areas. Report for Natural England.

The chapter on the Rural Economy might also usefully cross-refer more to Tourism (the following chapter).

The historic environment is a large driver for Tourism, and could be considered more in that chapter. Heritage-based tourism already accounts for at least £5 billion of GPD (The Economic Impact of the UK Heritage Tourism Economy, Kareen El Beyrouty and Andrew Tessler, Oxford Economics, 2013). The World Tourism Organisation recognises that nearly 40% of all international tourism is motivated by cultural heritage (<http://ec.europa.eu/enterprise/sectors/tourism/cultural-routes/>) and the government's recent 'Britain is Great' campaign highlighted the key role that heritage has to play in attracting future tourists from emerging markets such as China. The management of the landscape and features such as traditional buildings, and of vibrant and distinctive urban areas, will play a vital role in attracting home and foreign visitors, in addition to well-known heritage sites.

P.143 – “other characteristic features” might include or be better expressed as “other historic environment assets”.

Finally, we supplied Defra with two papers earlier in the year (The Historic Environment in the Rural Development Programme 2014-2020 and The Contribution of Heritage to Rural Economies) which contain additional points of detail which should be considered, particularly in relation to the potential of heritage for growing rural economies.

## **7 Do you agree that the draft SEA objectives put forward provide an appropriate framework for assessing the environmental effects of the Rural Development Programme?**

### **Do you agree that the draft SEA objectives put forward provide an appropriate framework for assessing the environmental effects of the Rural Development Programme?:**

The draft SEA topics provide a good framework for assessing the environmental effects of the RDP. The 12 main topic headings set out on p.5 and p.143 are comprehensive. However, we are concerned that some actions may have a cumulative effect on the environment in its broadest sense, and that these may not be fully understood by splitting up the topics into rigid areas for assessment. This has been recognised (p.62) but needs more detail.

For example, in the new scheme, it is possible that a farmer may undertake some actions which have both a positive effect on water quality and the historic environment – we would wish to ensure that both elements could be assessed. The same will also be true of course in relation to negative impacts.

## **8 Are the number, focus and level of detail of the proposed objectives and sub-objectives appropriate and proportionate given the aims, geographical scope and likely influence of the Rural Development Programme?**

**Are the number, focus and level of detail of the proposed objectives and sub-objectives appropriate and proportionate given the aims, geographical scope and likely influence of the Rural Development Programme?:**

We are content, subject to the provisos set out in our other answers.

## **9 Do you agree with the broad approach outlined above for considering reasonable alternatives?**

**Do you agree with the broad approach outlined above for considering reasonable alternatives?:**

The approach to assessing alternatives (p.145) seems a reasonable one. We would wish to ensure that the implications for all aspects of the historic environment in the landscape, including traditional farm buildings, boundaries, archaeological sites both above and below-ground, parks and gardens, battlefields, and cultural world heritage sites with a significant rural element, are fully understood.

It might be helpful to measure the nine options (p.145) against present levels of spending in relation to the historic environment in the current scheme, as that would better highlight areas of proposed change. It is our view that most of the alternative options (p.145) - and with the possible exception of Option 6 - are likely to represent less spending on the historic environment than at present, and we would therefore expect the results to fully set out the likely changes - positive and negative - to the historic environment for each of those alternative Options. In the event of reduced spend being deployed through NELMS (in particular) we would also urge that all other possible policy mechanisms (such as Greening and cross-compliance) are explored to prevent detrimental impacts - for which reason we think it appropriate for there to be some commentary on these alternatives within the discussion of different options.

## **10 Do you agree with integrating elements of an ecosystem services approach where appropriate as part of the SEA methodology?**

**Do you agree with integrating elements of an ecosystem services approach where appropriate as part of the SEA methodology?:**

We agree that an integrated approach is the correct one (see also our answer to Q7 above), but we feel strongly that it should include landscape and thereby include the historic environment (utilising the ELC definition of landscape). If however the ecosystems services approach is to be used in a way that expressly recognises and includes landscape and the historic environment (and the latter's evidential significance) - integral to which must be an assessment of cultural ecosystems services - then we are content. The National Ecosystem Assessment, for example, classifies 52.1% of the land area in England (39.3% in UK) as Enclosed Farmland, and refers to its cultural significance in general terms, and we have also contributed to the Defra National Ecosystems Assessment follow-on phase work on cultural ecosystems. English Heritage and its partners are now nearing completion of the national programme of Historic Landscape Characterisation (HLC), showing how different types of enclosed land (from regular enclosure with thorn hedges to species-rich medieval enclosed land) and a rich variety of other historic landscape types provide a framework for not only understanding the distributions of heritage features and assets (such as prehistoric settlement sites and traditional farmsteads and farm buildings), but also offer a framework for different ways of valuing, managing and considering the options for future environmental change (particularly when developing habitat-related management and strategy). HLC is showing (once more) the correlation between the cultural and the natural. As an example, enclosed land may result from the ancient, gradual or survey-planned enclosure of medieval farmland, woodland and rough ground - and early enclosed landscape types in particular commonly have species-rich grasslands and field boundaries and a higher biodiversity value than most other enclosed land (especially when under permanent pasture). To take another example, the goods and services offered by unenclosed land (inland and coastal downland, moorland, heath etc) result from the way that their environments have been adapted and used in the past. They provide valuable habitats and amenity space, in addition to their key role in carbon sequestration and water storage, but they also retain some of the best-preserved evidence for largely pre-medieval land use, settlement and ceremony/ritual within Europe. This demands an integrated approach to land, heritage and habitat management.

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