

Response ID ANON-BUFB-SUBF-F

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Introduction

1 What is your name?

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3 What is your organisation?

Organisation:

English Heritage

Questions

4 With regard to 'reasonable alternatives'; are there further reasonable alternatives, given the geographic scope, objectives, powers and the time period over which the plan extends?

With regard to 'reasonable alternatives'; are there further reasonable alternatives, given the geographic scope, objectives, powers and temporal scale of the plan?:

We believe that the nine scenarios presented represent a fair and reasonable assessment of the alternatives.

5 Are there any significant effects (positive and negative) that haven't been identified (please provide evidence).

Are there any significant effects (positive and negative) that haven't been identified (please provide evidence):

We do not feel that the positive benefits of the current programme and Environmental Stewardship – principally for example the progress that it has made in removing sites from the Heritage At Risk Register (Heritage at Risk is a national statistic and English Heritage has a KPI set by the DCMS which relates to the number of such sites removed from the Register) – have been given sufficient weight or been adequately factored into the baseline for the assessment. This is also true of the historic environment more widely and is important in so far as the reduction in future funding for new agreements is likely to considerably reduce the opportunities for conserving and maintaining heritage. This will have an adverse impact upon the delivery of this objective and is an important point, and one which we feel should be made clearer. We would be happy therefore to provide more detailed figures on the removal of sites from the Heritage at Risk Register through the use of agri-environment schemes, and on conserving the historic environment more widely - we think these would provide a valuable baseline against which future delivery can be measured.

6 Is there any further evidence that should be considered in finalising the assessment?

Is there any further evidence that should be considered in finalising the assessment?:

We feel that the SEA assessment summaries setting out the "do-minimum" and "business as usual" i.e. the extant RDP baselines, are helpful. However, we do not agree with the assessment on p71 under the "protect and enhance cultural heritage in rural areas". As with our comments in relation to the previous question, we feel that the "business as usual" box should also include an assessment of archaeological sites, particularly those on the Heritage at Risk Register. Specifically, the last RDP was very successful in helping to remove a significant number of important and significant archaeological sites from the Heritage at Risk Register (through both ELS and HLS), and this isn't fully reflected as a baseline condition. We feel that this is unlikely to continue under the new scheme, and that more broadly, both the capacity and opportunities for delivering positive outcomes for heritage will be similarly reduced.

As a consequence we also believe that that the statement about similar levels of funding (under Landscape and Cultural Heritage) on p.69 of the SEA may be unintentionally misleading. It is true that in the extant RDP, cultural heritage is a priority – but the Ministerial statements accompanying the CAP reform consultation responses have been clear that it will be a secondary or lower objective within the new scheme and unlikely to receive a similar level of funding as it does at the moment. Although the SEA does state that not all ES contracts will be renewed, we feel the effects and impacts of reduced funding for delivering agreements which address the historic environment should be assessed further. This is particularly important considering the Secretary of State's announcement in December 2013 that modulation levels will be reviewed in 2016-17.

We feel that the current funding levels for the historic environment represent very good value for money. They are relatively insignificant in comparison to the resources given to other objectives but produce quick, measurable and beneficial results for the historic environment, for landscape and contribute towards Defra's growth objectives. In the light of this we think it essential that a fuller consideration of the likely effects of reduced funding for the historic environment is needed in order to help assess the full impact of the new Programme.

Finally, it would be helpful to set out (p.110 of SEA) more details of how the monitoring of the NCAs in relation to landscape and cultural heritage will be undertaken by Defra.

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