

RESCUE, the British Archaeological Trust: our response to “Health and Harmony: the future for food, farming and the environment in a Green Brexit” Department for Environment Food and Rural Affairs.

8th May 2018

Consultation questions are in blue, Rescue responses in black

2. Reform within the CAP

2.1 Please rank the following ideas for simplification of the current CAP, indicating the three options which are most appealing to you:

- a) Develop further simplified packages*
- b) Simplify the application form*
- c) Expand the online offer*
- d) Reduce evidence requirements in the rest of the scheme*

Please give a short explanation as to your ranking preferences:

We have no preference but please see comments in the subsequent response

2.2 How can we improve the delivery of the current Countryside Stewardship scheme and increase uptake by farmers and land managers to help achieve valuable environmental outcomes?

The poor uptake of the latest Countryside Stewardship is certainly of concern, but Rescue is more deeply concerned by the reductions in the funding for, and the availability of, options for the historic environment within the current scheme, particularly given that the historic environment has always been poorly represented within the schemes. There is an urgent need to improve and re-integrate protection and improved management of the wide range of heritage assets that exist within the British countryside and that are key to a sense of place within the landscape. Improvement along these lines, including continuing the existing Hedgerows and Boundaries Grant which has proved successful, will help integrate the historic environment into future management schemes as promised by the recent 25-Year Environment Plan (eg “Safeguarding and enhancing the beauty of our natural scenery and improving its environmental value **while being sensitive to considerations of its heritage**”).

2.3 Do you have any further comments?

Although simplification of over-bureaucratic systems is to be welcomed we have concerns about the potential for damage an over-simplistic approach may cause. The natural and historic environment is not simple and decisions may actually lead to environmental harm unless adequate information is available. For the historic environment it is important to protect nationally important assets as defined in the Natural England/Historic England SHINE database which was set up for these schemes and to seek advice from the local Historic Environment Record (HER).

3. An ‘Agricultural Transition’

3.1 What is the best way of applying reductions to Direct Payments? Please select your preferred option from the following:

- a) Apply progressive reductions, with higher percentage reductions applied to amounts in higher payment bands*
- b) Apply a cap to the largest payments*

c) Other (please specify)

We do not have a strong preference, except to emphasise that it is essential that all environmental funds, as opposed to direct payments, must be fully maintained and must not be capped during the transition period. To make clear the direction of change all landowners should see changes directed towards payment for public goods, and these public goods must include benefits for the historic alongside the natural environment.

3.2 What conditions should be attached to Direct Payments during the 'agricultural transition'? Please select your preferred options from the following:

a) Retain and simplify the current requirements by removing all of the greening rules

b) Retain and simplify cross compliance rules and their enforcement

c) Make payments to current recipients, who are allowed to leave the land, using the payment to help them do so

d) Other (please specify)

d) Other. Rescue sees the existing GAEC (Good Agricultural and Environmental Conditions), which fall within the cross compliance guidelines, as an essential minimum for the historic environment that must be retained. At present these include the protection of boundaries (GAEC 7a) and a statement of the legislative requirements around Scheduled Monuments (GAEC 7e). Rescue suggests that similar protections should be stipulated for all non-designated archaeological sites of national importance listed in the SHINE database.

3.3 What are the factors that should drive the profile for reducing Direct Payments during the 'agricultural transition'?

New schemes should be comprehensively tested and piloted during this phase and this will require adequate funds. For the historic environment this funding must include sufficient professional input from Historic England and from local authority advisors and Historic Environment Records.

3.4 How long should the 'agricultural transition' period be?

No comment

4. A successful future for farming – Farming excellence and profitability; Agricultural technology and research; Labour: a skilled workforce

Rescue does not have detailed knowledge on these aspects. However for the historic environment to be understood as an integrated part of the environment of any individual landholding there needs to be access to professional advice including the local authority Historic Environment Record. There has also been significant research, for example relating to issues of archaeological management and soil compaction, which is often not accessible to farmers.

PART 2: IMPLEMENTING A NEW AGRICULTURAL POLICY IN ENGLAND

5. Public money for public goods

5.1 Which of the environmental outcomes listed below do you consider to be the most important public goods that Government should support? Please rank your top three options by order of importance:

a) Improved soil health

b) Improved water quality

c) Better air quality

d) Increased biodiversity

e) Climate change mitigation

f) Enhanced beauty, heritage and engagement with the natural environment

Please give a short explanation as to your ranking preferences:

Rescue fully supports the premise that a new agricultural payment scheme should be based on public goods.

However we reject an approach that reduces policy decision-making to a simplistic top three pick list as offered in questions 5.1 and 5.2. As noted in our response to Chapter 2 the reduction of the environment, both natural and historic, to discrete chunks is potentially very damaging. To expect educated citizens to score these lists in any meaningful way is absurd and government policies should not be informed by a popularity quiz.

A new system must adopt a fully holistic approach recognizing that delivery of one public good will often deliver others, and that delivery of one good must not be allowed to unwittingly increase damage to irreplaceable assets such as the heritage as has occurred in the past.

The minimum heritage element within new schemes, as for the transition period, should always take account of all designated assets and all other nationally important sites as defined within the SHINE database. Local information and understanding of the historic environment should be gathered and regularly updated from the Historic Environment Records and local authority advisors to inform significance within the local context. This will contribute to a system that produces meaningful multiple outcomes for the environment.

It must be recognized that the scale of need is colossal: for example, we have already lost half of our traditional farm buildings, and hundreds of thousands more are in decay, almost half of scheduled monuments are under threat, as are hedgerows, parkland, and historic field systems. The number of non-designated heritage assets under threat is unquantified. As the consultation document says (evidence compendium, p55), heritage “is a non-renewable resource which, once lost, cannot be recreated”, and agriculture has been one of the biggest contributors to heritage loss throughout the last century. For much rural heritage, the economics of farming mean that funding as a public good is its only chance of long-term survival.

It is unfortunate that option (f) and the origins of this phrase in the 25-year goals of the Environment Plan include the work “natural”. Engagement can and should be with all aspects of our environment and certainly engagement with the historic environment should be equally part of the new scheme outcomes.

5.2 Of the other options listed below, which do you consider to be the most important public goods that Government should support? Please rank your top three options by order of importance:

- a) World-class animal welfare
- b) High animal health standards
- c) Protection of crops, tree, plant and bee health
- d) Improved productivity and competitiveness
- e) Preserving rural resilience and traditional farming and landscapes in the uplands
- f) Public access to the countryside

Please give a short explanation as to your ranking preferences:

See response to 5.1 above

6. Enhancing the environment

6.1 From the list below, please select which outcomes would be best achieved by incentivising action across a number of farms or other land parcels in a future environmental land management system:

- a) Recreation
- b) Water quality
- c) Flood mitigation
- d) Habitat restoration
- e) Species recovery
- f) Soil quality
- g) Cultural heritage
- h) Carbon sequestration and greenhouse gas reduction
- i) Air quality
- j) Woodlands and forestry
- k) Other (please specify)

Please give a short explanation as to your preferences:

Cultural heritage assets may be extensive; for example a single prehistoric ritual complex will easily cross land boundaries between two or more holdings.

The historic character of an area has generally been recorded and mapped for England (Historic Landscape Characterisation) and is held by the local Historic Environment Record. This provides key information to identify which historic environment elements contribute to the present day landscape and sense of place across multiple holdings.

However this should not detract from the importance of individual holding schemes that protect complete heritage assets.

6.2 What role should outcome-based payments have in a new environmental land management system?

Heritage outcomes should form an integral part of any future scheme, and should be included in the pilot schemes. As stated above (5.1) there is a substantial and urgent need for a new approach to preserve our rural heritage and most heritage outcomes are easily measured.

6.3 How can an approach to a new environmental land management system be developed that balances national and local priorities for environmental outcomes?

No comment.

6.4 How can farmers and land managers work together or with third parties to deliver environmental outcomes?

No comment

7. Responsibility to animals

No comments.

8. Supporting rural communities and remote farming

8.1 How should farming, land management and rural communities continue to be supported to deliver environmental, social and cultural benefits in the uplands?

Upland areas often have particular concentrations of heritage, much of which is at current or potential risk. Payment for the provision of heritage public goods could therefore make a major contribution to the problems in these regions, provided the rates paid are sufficient: as elsewhere the current approach based on 'income foregone', which is small (at best) in these areas, must be discontinued.

8.2 There are a number of challenges facing rural communities and businesses. Please rank your top three options by order of importance:

- a) Broadband coverage*
- b) Mobile phone coverage*
- c) Access to finance*
- d) Affordable housing*
- e) Availability of suitable business accommodation*
- f) Access to skilled labour*
- g) Transport connectivity*
- h) Other, please specify*

Please give a short explanation as to your ranking preferences:

No comment.

8.3 With reference to the way you have ranked your answer to the previous question, what should Government do to address the challenges faced by rural communities and businesses post-EU Exit?

No comment

8.4 Do you have any further comments?

No

9. Changing regulatory culture

9.1 How can we improve inspections for environmental, animal health and welfare standards? Please indicate any of your preferred options below.

a) Greater use of risk-based targeting

b) Greater use of earned recognition, for instance for membership of assurance schemes

c) Increased remote sensing

d) Increased options for self-reporting

e) Better data sharing amongst Government agencies

f) Other (please specify)

Please give a short explanation as to your preferences:

No comment

9.2 Which parts of the regulatory baseline could be improved, and how?

The current GAEC rules need to be continued, including those which protect the historic environment, but these provide minimal guidance for protecting the heritage. The retention of nationally-important but non-designated archaeological features in the SHINE database should be added. Any future regulatory baseline should be consulted on.

9.3 How can we deliver a more targeted and proportionate enforcement system?

No comment.

9.4 Do you have any further comments?

No.

10. Risk management and resilience

No comments.

11. Protecting crop, tree, plant and bee health

No comments.

12. Ensuring fairness in the supply chain

No comments.

PART 3: THE FRAMEWORK FOR OUR NEW AGRICULTURAL POLICY

13. Devolution: maintaining cohesion and flexibility

No comment

14. International trade

No comment.

15. Legislation: The Agriculture Bill

15.1 How far do you agree with the proposed powers of the Agriculture Bill? Agree/disagree etc

The consultation gives little detail.

15.2 What other measures might we need in the Agriculture Bill to achieve our objectives?

The new Agriculture Act must maintain and update the 1986 Act (Agriculture Act 1986, Sections 17 and 18), obliging the Secretary of State to put heritage on an equal footing in funding and other decision-taking with the natural environment, the social and economic interests of rural communities, and public enjoyment of the countryside. The wording needs slight revision to provide a more holistic definition of the historic environment; it could read "...the conservation and enhancement of the natural beauty and amenity of the countryside (including its flora and fauna and geological and physiological features), and of heritage assets (of value for their archaeological, architectural, artistic, or historic interest)". This is in line with standard definitions of heritage assets.

The Agriculture Bill could provide an opportunity to amend s61(7) of the Ancient Monuments and Archaeological Areas Act 1979 so as to allow the limited number of nationally-important archaeological sites without structures, which cannot be designated under existing law, to be considered for designation as scheduled monuments. It could also provide an opportunity to revise Class Consent 1 in the 1979 Act, which allows ongoing cultivation of scheduled monuments and has led to a serious decline in the condition of monuments, as detailed in Historic England's Monuments at Risk surveys. These measures have been previously agreed across parties as elements of new heritage legislation which has been abandoned due to outside factors such as change of government. Rescue believes that these minor legislative changes are now long overdue.

15.3 Do you have any further comments?

Rescue hopes that the government will take this opportunity to move forward with an integrated approach to the potential environmental benefits of a new system that fully recognises the significance of the historic environment and, with better funding, rewards protection and enhancement of our heritage. For too long agricultural practices, often driven by short term or ill-considered grant schemes, have caused unnecessary damage to important monuments and to the visual look and feel of the rural environment.