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8 May 2018

Dear Madam/Sir,

**Re: Health and Harmony: the future for food, farming and the environment in a Green Brexit**

Thank you for the opportunity to comment on these proposals. We have responded to the online survey but also wish to provide this letter in order to make a number of key points regarding the development of the new Agriculture Bill and future Environmental Land Management Scheme and the historic environment. We feel this is important given the constrained nature of the formal survey.

Our evidence is primarily concerned with highlighting the continued importance of agricultural land management to the preservation, conservation, and management, of archaeology and the historic environment. We would like to highlight our key issues and policy proposals for how future policies for food, farming and the environment should be structured to ensure the continued contribution of the historic environment to public goods post-Brexit.

Our answers to the online survey are appended below the letter.

***About us:***

The Chartered Institute for Archaeologists (CIfA) is the leading professional body representing archaeologists working in the UK and overseas. CIfA promotes high professional standards and strong ethics in archaeological practice, to maximise the benefits that archaeologists bring to society, and provides a self-regulatory quality assurance framework for the sector and those it serves.

CIfA has over 3,500 members and more than 80 registered practices across the United Kingdom. Its members work in all branches of the discipline: heritage management, planning advice, excavation, finds and environmental study, buildings recording, underwater and aerial

archaeology, museums, conservation, survey, research and development, teaching and liaison with the community, industry and the commercial and financial sectors.

The Council for British Archaeology (CBA) is an educational charity and national amenity society with a leading role in championing the public interest in archaeology. CBA works throughout the UK to involve people in archaeology and to promote the appreciation and care of the historic environment for the benefit of present and future generations. CBA has a membership of 500 heritage organisations who, together with our thousands of individual members, represent national and local bodies encompassing state, local government, professional, academic, museum and voluntary sectors.

***Main comments:***

A key part of our countryside is our rural heritage of traditional farm buildings, villages, field boundaries, ancient monuments, woods, and parkland. These are important in their own right, and they deliver substantial benefits for rural communities: they underpin the beauty, diversity and sense of place which attracts inward investment, are a key driver of the £19bn rural tourism industry, and their conservation creates skilled employment, often in areas where jobs are scarce.

Government has set ambitious targets for the environment in its 25-YEP, which we support. We are also pleased that there is a recognition that “our failure to understand the full value of... the environment and cultural heritage has seen us make poor choices”. We agree that “we can change that...”. As such, our key aims in responding to this consultation are to ensure;

- a new system which puts heritage on an equal footing in decision-taking with the natural environment, the social and economic interests of rural communities, and public enjoyment of the countryside
- a new agriculture bill that maintains the commitments found in the 1986 Act (sections 17 & 18), with the proposed new statutory body having a responsibility to hold governments to these objectives,
- that a reassessment of the prioritisation of heritage takes place, as it currently only receives only 0.25% of CAP funding,
- a system which supports public money for public goods, phasing out per-hectare support, which builds around these issues of balanced interests and proportionality,

- that the natural capital approach to understanding and measuring value is appropriately supplemented by both cultural capital and wider integrated landscape approaches, and
- that the necessary time is taken to perfect a system which works for the UK, post-Brexit, even if this takes longer than the allotted 2 years transition, where required.

***A three-legged stool:***

We subscribe to a ‘3-legged stool’ model for understanding the environment; the 3 legs refer to the natural environment, the historic environment and contemporary used landscape. These three elements are interrelated. One will not function without the other. In the UK virtually all landscapes are intimately shaped by thousands of years of human habitation, cultivation, and exploitation. This is not, and never has been, properly reflected in the CAP schemes which have gone before, but we have an opportunity to do so now. As Michael Gove recently said in his ‘The Frozen Moment’ speech;

‘...the beautiful landscape that we enjoy in so many cases has not happened by accident but has been actively managed.’

We strongly welcome the fact the 25-YEP focuses on public goods and we welcome the tone of the public consultation, however, it is vital that a holistic approach is taken to agriculture, environmental and rural landscape management and that it is applied consistently, and at all levels of implementation. It is not appropriate to pursue any type of pick and choose, competitive, vision.

***Natural capital approach***

We are concerned that the currently outlined natural capital approach will, by its design, impact the way in which this integration of natural, cultural/historic and landscape value is balanced, and that there are parts of the historic environment which will not be able to demonstrate benefits through this approach. We therefore think that it is vital additional ways to ensure valuation of the whole spectrum of environmental and landscape issues are made explicit.

For example, the new ELMS will not only have the opportunity to replace existing Countryside Stewardship, but it will also be an important vehicle to replace other EU programmes such as LEADER and LIFE programmes and the European Regional Development Fund (EDRF), all of which extend beyond the scope of the natural capital approach and are equally vital to the proper functioning of the rural environment.

### ***Getting it right***

Finally, the scale and importance of this task is not underestimated by government; it is a once in a lifetime opportunity to improve environmental management in the UK and we believe that the necessary time should be taken to get it right.

Our experience of Countryside Stewardship was one of a programme rushed into service, with poorly designed and under-resourced systems for administration. Administering a system of public money for public goods will necessarily be more complicated than administering a basic payment, and provides more opportunity to develop innovative programmes tailored for the needs of farmers and the environment in the UK. It is therefore likely that more regulation will be required, not less, and that time will be required to get it right.

### ***Policy proposals: 'A Tourism Payment'***

There is ample evidence for the economic value of our countryside: For example, National Parks England estimates a UK GVA of £0.38 per £1 of output for agriculture, forestry and fisheries, and £0.63 per £1 of output for arts, entertainment and recreation in national parks, cumulatively £626m of local GVA. The Tourism Alliance (2016) estimates that day visits to the countryside account for 21% of tourism spend (approx. £11.3 billion).

Tourists who visit some of our most beautiful, but also vulnerable, areas, for example upland and remote areas, may visit and admire the scenery, but there is relatively low recognition of the fact that these landscapes are inherently shaped by human action through farming and wider land management over centuries. Without the continued existence of traditional farming and rural land management practices many of these areas would decline in the beauty and attractiveness which attracts tourists. Removal of the basic payment scheme will constitute a particular threat to these areas.

In our evidence we outline our idea for a '*Tourism Payment*' policy which we think could help to ensure that farmers in these vulnerable areas are suitably supported to transition to a more sustainable funding model, and recognises the importance of what farmers do to preserve the character of the landscape.. This is likely to be particularly helpful in the light of the loss of funding for local communities previously accessible through programmes like LEADER, LIFE, and the EDRF.

This policy seeks to reflect that by operating and managing the landscape, farmers are contributing to wider public goods simply through their continued maintenance of the landscape and its character, an act which has value in and of itself. This value is in addition to any environmental gains they are able to make. This policy could be made accessible in areas

where agricultural sustainability is particularly precarious, which often overlaps with areas designated for their beauty or cultural and natural value. The payment would constitute a fair reward to farmers and land managers for their contribution to the maintenance of the UK's rural tourist economy.

**Access to specialist advice & alternate options for scheme management**

We are also keen to encourage government to explore options for delivery of EMLS through greater partnership with local authorities who in many cases have an unique range of specialist expertise in both natural and historic environment issues, as well as particular local knowledge, who could add significant value to scheme management, monitoring compliance, and undertaking inspection. Any additional burdens on local authority staff would of course, require additional resources, which in the past have been the sticking point for why this logical partnership has not been more regularly undertaken.

If you have any further questions or comments, please do not hesitate to contact me.

Yours sincerely,



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Policy and Communications Advisor, ClfA



Ken Smith  
Chair of Trustees, CBA

## **Appendix: ClfA & CBA joint consultation response**

Our comments to the consultation questions follow, below. Our response ID for our Consultation Hub response is: ANON-N63Y-ZFW2-S.

### **Reform within CAP**

- 1. Please rank the following ideas for simplification of the current CAP, indicating the three options which are most appealing to you. Please rank your choices by order of preference (from 1 as your most preferred to 3 as your least preferred):**

*Our answer:*

- RANKED 1: Develop further simplified packages
- RANKED 2: Expand the online offer
- RANKED 3: Simplify the application form

*Please give a short explanation as to your ranking preferences:*

At present, of the four simplified packages announced by the Secretary of State last year, none feature historic environment options. If simplified packages are to be a feature of the agricultural transition it will be important to ensure that access to, and availability of, historic environment and heritage options is improved for scheme entrants.

We have no strong preference between the other options.

### **2. Further questions on reform within CAP:**

- a) 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 existing Countryside Stewardship Scheme has been hampered by its poor-quality administration and complex design. The scheme has also restricted the number of historic environment options available, for example for capital grants for traditional farm building repair. This is despite these options being popular with landowners, frequently oversubscribed, and backed up with good evidence of delivery. Ensuring the availability of these options during an agricultural transition should be a priority.

Generally speaking, it should be the intention of government to widen, not reduce, available options available both now, during an agricultural transition, and in a new post-Brexit system. As stated above, however, it is also a concern that the current four simplified packages for

Countryside Stewardship (CS) contain no historic environment options. If a simplified delivery model during an agricultural transition period adopts a similarly narrow platform, substantial harm to historic assets is likely to occur. Simplification should not mean a reduction in available options.

**b) Do you have any further comments?**

It is positive to see that in the command paper and in the 25-YEP that the historic is given parity with the natural in environmental management. This integrated approach is logical given the intrinsic interconnectedness of natural and cultural elements of our landscapes and is vital to the maximisation of public goods.

At present, however, the historic environment is significantly underrepresented, underfunded and under-utilised in agri-environment schemes. Under Countryside Stewardship, the whole historic environment currently receives about 0.25% of total CAP funding, and just 0.75% of environmental funding. As a contrast, research by the National Trust, RSPB and Wildlife Trusts (2017) recommends that historic environment needs are far higher (for example, public goods created through maintenance and repair of stone walls and archaeological features alone would require a 10% share of total current funding, based on meeting management priority needs). Of course, overall, need will outstrip supply, but with greater resources re-allocated from Pillar 1, it should also be considered whether the historic environment's share should increase. As the 25YEP says, "in the past, our failure to understand the full value of the benefits of environment and cultural heritage has seen us make poor choices. We can change that."

The 25YEP throughout gives future parity to the natural environment and historic environment (the purpose of the new Environmental Land Management System (ELMS) is to "incentivise land managers to restore and improve our natural capital and rural heritage"). That same parity of approach should be applied now to the remaining years of Countryside Stewardship, primarily by ensuring that historic environment options are available and funded in improved schemes, and also by using standalone schemes as below.

At the very least, historic environment options must be incorporated into simplified schemes for the remainder or the period of Countryside Stewardship and through the agricultural transition. Standalone schemes, such as the Hedgerows and Boundaries Repair Grant (although only accounting for a single part of the historic environment), have proved immensely popular. This particular scheme is also only currently able to tackle a tiny percentage (0.02%) of the 210,000km of traditional stone walling in the UK in any given year. The restoration of 46km of dry stone wall is, of course, an undoubted success, and the

Hedgerows and Boundaries grant is well-designed and administered, but is important to highlight the impact of such a grant against the wider scale of need.

These schemes could clearly be greatly expanded, fostering jobs in heritage craft, and preserving traditional skills in rural areas, and developing benefits in terms of habit creation, preservation of rural character, and fostering tourism. Further similar standalone schemes, particularly capital grant schemes for heritage conservation projects, could also be introduced.

### **An agricultural transition:**

#### **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)

No strong preference.

*Please provide views on the payment bands and percentage reductions we should apply:*

We are pleased that the Government intends to move away from direct payments after Brexit and that during an agricultural transition, efforts will be made to support farmers to prepare for new systems, removing perverse incentives which limit innovation and capping the level of income starting with the recipients of the largest sums, particularly where public goods are not being delivered.

We have no comment on how quickly or by what method this transition should take place. However, clearly environmental funding should never be capped, with no upper limit on the amount of environmental benefit which can be delivered. These payments should be proportionately increased in line with the gradual decrease in basic payments.

It is possible that some areas – remote uplands, for example – may require a separate transition strategy, particularly in the light of the loss of funding for local communities previously accessible through programmes like LEADER, LIFE, or the European Regional Development Fund (EDRF).

In such areas, there may also be a need to institute a more permanent sustainability policy, based upon the recognition of the importance of what farmers do to preserve the character of these particular landscapes (which often overlap with designated areas most prized for their



beauty and attractiveness). We would therefore like to propose a 'Tourism Payment' policy, which we will describe below.

There is ample evidence for the economic value of our countryside: For example, National Parks England estimates a UK GVA of £0.38 per £1 of output for agriculture, forestry and fisheries, and £0.63 per £1 of output for arts, entertainment and recreation in national parks, cumulatively £626m of local GVA. The Tourism Alliance (2016) estimates that day visits to the countryside account for 21% of tourism spend (approx. £11.3 billion).

Tourists who visit these areas may visit and admire the scenery, but there is relatively low recognition of the fact that these landscapes are inherently shaped by human action through farming and wider land management over centuries. Without the continued existence of traditional farming and rural land management practices many of these areas would decline in the beauty and attractiveness which attracts tourists. Removal of the basic payment scheme will constitute a particular threat to these areas.

One solution to this may be a 'Tourism Payment' policy which seeks to reflect that by operating and managing the landscape, farmers are contributing to wider public goods simply through their continued maintenance of the landscape and its character, an act which has value in and of itself. This value is in addition to any environmental gains they are able to make. This policy could be made accessible in areas where agricultural sustainability is particularly precarious, which often overlaps with areas designated for their beauty or cultural and natural value. The payment would constitute a fair reward to farmers and land managers for their contribution to the maintenance of the UK's rural tourist economy.

**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)

No Strong preference.

*Please give a short explanation as to your preferences:*

Current GAEC conditions relating to the historic environment should be retained in full for all direct payments during the agricultural transition and embedded by appropriate means under the new Environmental Land Management Scheme.

The Selected Heritage Inventory for Natural England (SHINE) database system should also be retained and improved so that it encompasses a wider range of non-designated heritage assets as well as designated ones. This national database is an exemplar system which has great potential for expansion and improvement of the management of the historic environment.

An additional issue is that of monitoring compliance and undertaking inspection, as at present there are insufficient inspection/compliance built into schemes. This can be provided by, for example, local authorities where specialist staff are in post, but only if suitable payments are made for this service.

### **3. Further questions on reducing Direct Payments:**

#### **a) What are the factors that should drive the profile for reducing Direct Payments during the 'agricultural transition'?**

Moving to a system of public money for public goods will require testing of the models and approaches that will underpin it. It will be important to develop pilots for managing historic and cultural heritage values in addition to natural capital approaches (e.g. a parallel cultural capital approach), as well as testing other schemes.

Transitioning to a place where farmers are comfortable with the processes of environmental projects will also be a key factor in driving the reduction of direct payments. This will include building new relationships with practitioners and developing an ability in specialist sectors to deliver environmental and heritage services to landowners.

#### **b) How long should the 'agricultural transition' period be?**

Two years is a decent ambition for the most prepared farmers and landowners, though we suspect that there may be a 'long tail' to support some farms in the transition over a longer period. At the very least, government should seek to launch a 'public money for public goods' agri-environment programme in 2021, even if some of the most vulnerable farmers require special elongation of a transition period.

However, it is also important to recognise that this is a once in a lifetime opportunity to improve the systems of agricultural and environmental management and that additional time should be taken, if required, to build a system which will achieve these benefits. For example,

the current system of Countryside Stewardship was built in two years and it has proved incapable of dealing with particular challenges, such as landscape-scape delivery. Other limitations in scope and delivery could have been mitigated with more resources and more time.

**A successful future for farming: farming excellence and profitability:**

**1. How can we improve the take-up of knowledge and advice by farmers and land managers? Please rank your top three options by order of preference (from 1 as your most preferred to 3 as your least preferred):**

*Our answer:*

- RANKED 1: Better access to skills providers and resources
- RANKED 2: Encouraging benchmarking and farmer-to-farmer learning
- RANKED 3: Making Continuing Professional Development (CPD) a condition of any future grants or loans

Please give a short explanation as to your ranking preferences:

This answer refers to areas beyond our core competences. However, there are elements of this issue which have relevance to the historic environment, for example; the need to ensure farmers have the knowledge and skills they need to manage historic assets on their land; and the loss of specialist skills within the historic environment sector (e.g. thatchers, dry-stone-wallers, hedge-layers).

These are issues on which the post-Brexit Environmental Land Management System could take a strategic view, for instance, structuring expectations for specialist heritage jobs created as a result of new demand from schemes. Training elements for farmers should also be built into schemes, as well as building mechanisms through which landowners and farmers to learn from appropriately accredited historic environment specialists, such as consulting archaeologists or historic building conservators.

There is some potential to meet these challenges through enhancement of the role of local authorities in delivering services, or even managing whole schemes. For example, in the past, local authority historic environment specialists have been asked to assist with monitoring of schemes. However, any such additional burden would require additional resources, and in the past, these have not been available.

Some Local Planning Authorities may also have capabilities to undertake much more widespread management of schemes. For example, in NPAs or upland areas, the local

knowledge and specialist skills sets of authority staff may provide opportunities for flexible and locally appropriate administration of schemes. This could be a useful way to develop capabilities under a new system.

Ensuring that, by whatever means, local authority expertise is consulted and enabled to develop positive relationships with farmers and with scheme administrators will be important to the effective take-up of knowledge and advice, and to the tailoring of advice to suit local needs.

### **Public money for public goods**

- 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:**

*Our answer:*

- RANKED 1: Enhanced beauty, heritage and engagement with the natural environment
- RANKED 2: Climate change mitigation
- RANKED 3: Increased biodiversity

*Please give a short explanation as to your ranking preferences:*

We do not think that it is appropriate to set this question as a 'preference'. We have answered based on our specialist interest in the historic environment, as will have many others. However, we think that it is unhelpful to promote the measuring of certain public goods against others.

We subscribe to a '3-legged stool' model for understanding the environment; the 3 legs refer to the natural environment, the historic environment and contemporary used landscape. These three elements are all relative, and one will not function without the other. In the UK virtually all landscapes are intimately shaped by thousands of years of human habitation, cultivation, and exploitation. This is not, and never has been, properly reflected in the CAP schemes which have gone before, but we have an opportunity to do so now. As Michael Gove recently said in his 'The Frozen Moment' speech;

'...the beautiful landscape that we enjoy in so many cases has not happened by accident but has been actively managed.'

We strongly welcome the fact the 25-YEP focuses on public goods and we welcome the tone of the public consultation, however, it is vital that a holistic approach is taken to agriculture, environmental and rural landscape management and that it is applied consistently, and at all levels of implementation. It is not appropriate to pursue any type of pick and choose, competitive, vision.

All of the above listed public goods are valuable in their own right. Heritage itself is both a cost-effective generator of economic, social, and environmental benefits, and an effective vehicle to improve understanding and valuation of other countryside and environment issues such as climate change. It is vital that all six aims are supported by government in parallel and are not treated as issues which can legitimately be subject to a popularity contest.

**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:**

*Our answer:*

- RANKED 1: Preserving rural resilience and traditional farming and landscapes in the uplands
- RANKED 2: Improved productivity and competitiveness
- RANKED 3: Other

*Please give a short explanation as to your ranking preferences:*

Traditional farming activities and land uses actively shape heritage in the present, as well as the past, and encourage reflection on the creation and preservation of heritage value as a useful activity in terms of government support for public goods. Rural communities are the custodians and guardians of much of that heritage, and should be enabled and supported to develop local identities and partnerships with landowners and farmers. Thus, activities which do this, such as investment in community-led stewardship of heritage assets, should be supported as an integral part of rural resilience. Community investment can boost tourism, have a positive knock-on effect on employment, generate inward investment, and develop added-value through localism and volunteering. The relationship between rural communities and agriculture obviously runs extremely deep, and so defining an agricultural policy should also recognise the effects it will have on rural communities and seek to create benefits in this area.

**3. Are there any other public goods which you think the government should support?**

Local community-led heritage stewardship, rural tourism investment, health and wellbeing activities. We also recognise a gap in the recognition of the marine historic environment, which is absent from the 25-YEP. It will be extremely valuable to make provision for maritime heritage and archaeology. We recommend that government's environmental policy should take account of this.

**Enhancing our environment:**

**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:**

*Our answer:*

- RANKED 1: Cultural heritage
- RANKED 2: Habitat restoration
- RANKED 3: Species recovery

*Please give a short explanation as to your preferences:*

Once again, we are answering on behalf of our specialism and have selected cultural heritage as our top option, but would like to express our concern at the framing of this question as a 'preference' that promotes the measuring of certain public goods against others. This is an inappropriate way to consider these questions.

Each of these areas has potential to benefit across other areas, and though we recognise that certain issues, such as species recovery and air quality are issues which do not stop at farm borders, *must* be treated in this way, there are many positive examples of landscape-scale approaches to historic environment issues being of wider benefit to the environment.

Whilst it is *possible* to see cultural heritage as a more 'asset-centred' issue, a wider landscape approach to understanding, researching, preserving, and engaging with cultural heritage assets is a much more positive way to ensure value from investment. For example, understanding landscapes in a holistic way allows for nuanced understanding of heritage and environment. For example, due to geological differences between the White Peak and the Dark Peak in the Peak District National Park, different heritage assets and local character arises (e.g. in the different use of hedgerows/stone walls due to geological variance, differences in enclosure patterns, ridge and furrow survival, etc.).

Existing countryside stewardship schemes access advice from local authority historic environment specialists who deliver advice on CS schemes. Additional resources to fund these

advisors (numbers of whom are in decline due to pressure on local government finances) could enable additional public goods such as better engagement with farmers and communities or promotion of outcomes, working with heritage professionals to achieve public benefits.

Historic assets can also play a part in the delivery of benefits from multi-farm or regional approaches in other areas, such as in wider habitat restoration and species recovery. They should therefore be integrated into decision-making on strategies for treating these issues, where applicable (e.g. a multi-farm approach to historic field boundary restoration to both protect the traditional character of an area, and provide additional habitat for species recovery).

## **2. Further questions on enhancing our environment**

### **a) What role should outcome based payments have in a new environmental land management system?**

The current outcome-based payments do not currently involve heritage, but we would welcome the development of a pilot to test this approach. Many heritage benefits are often comparatively straightforward to measure, and so may be appropriate to adopt this approach.

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

As stated above, appropriate systems for funding and engaging local authority expertise would be a method of improving reactivity to local circumstances and priorities.

### **c) How can farmers and land managers work together or with third parties to deliver environmental outcomes?**

Landscape scale projects have a positive potential to create opportunities to work between communities, land owners, farmers and other stakeholders, who are often affected by the same strategic issues. For example, the *Moors for the Future* project, which has received funding from the HLF, and several LIFE programme grants has been able to successfully integrate farmers, communities, water authorities, and other stakeholders in building a cross-cutting agenda for wildlife, heritage, archaeology, landscape, community health and well-being, while also employing citizen-science and other research initiatives. This type of externally funded project should not be considered to be outside the scope of a new ELMS, as it may be appropriate for the system to also seek to replace other sources of EU funding from programmes like LIFE and LEADER.

### **Supporting rural communities and remote farming**

#### **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 account for some of the most significant historic assets and landscapes such as hillforts, prehistoric remains, and industrial heritage (e.g. mining landscapes) and other rare or significant asset types. These assets contribute to the character of these areas and generate additional public benefits, such as through tourism and recreation revenues, as well as to the health and well-being agenda. Upland areas often feature high concentrations of heritage assets which place disproportionate burdens upon a few landowners. These asset types may also face significantly different challenges than other landscapes, for example, from damage by vegetation encroachment. It is vital, therefore, that the restoration and maintenance of these environmental assets continues to be recognised and prioritised under a CAP replacement.

As previously stated, the upland historic environment is indivisible from the natural environment and is an important part of the tourism draw to national parks and other areas. The heritage of upland communities is also often closely connected to traditional land management practices and features.

We would be interested to explore with government the potential for a 'Tourism Payment' policy which might be able to reward farmers for the contributions that they make to the maintenance of the UK's rural tourist economy. This 'Tourism Payment' could be set up to operate in areas where farming activity contributes to wider public goods simply through their continued practice. The payment would be in addition to any environmental public goods they directly generate.

In addition, there are a number of interesting potentials for managing archaeology in upland landscapes with reference to strategic goals for tourism or land use, including through partnership with National Park Authorities or other charitable landowners and with local communities (see, for example, the recently-launched capital grant for building repair scheme in 5 National Parks). These areas can help to foster pilots that can be expanded to wider areas as well. Conservation of historic farm buildings, walls and field boundaries may also have an impact on the creation of good quality, full time, jobs, and help to preserve local traditional heritage crafts skills.

It is also important that strategies for uplands are not treated in isolation, as conservation of historic assets are likely to overlap with issues such as prevention of over-grazing. Upland management critically requires integrated management. As mentioned above, integrated



landscape-scale, multi-partner projects may provide a model for a route to holistic management and delivery of public benefit in upland areas (see for example, Moors for the Future project).

### **Changing regulatory culture**

#### **1. Further questions on changing regulatory culture**

##### **a) Which parts of the regulatory baseline could be improved, and how?**

As previously stated, we recommend that the existing GAEC rules be retained, along with the SHINE database. However, there is a huge amount of data held by local Historic Environment Records which does not currently appear on these databases, and there may be opportunities to improve how additional information or new uses for data could help to inform management of the historic environment through schemes.

### **International Trade**

#### **1. How can we best protect and promote our brand, remaining global leaders in environmental protection, food safety, and in standards of production and animal welfare?**

Cultural heritage, rural tourism, and high-quality food production are interlinked, with a recognised potential of British exports being associated with traditional landscapes. It is important that the perception of British culture and its landscapes are utilised in the marketing of British products abroad.

### **Legislation: the Agriculture Bill**

#### **1. How far do you agree with the proposed powers of the Agriculture Bill?**

NEITHER AGREE NOR DISAGREE

#### **2. What other measures might we need in the Agriculture Bill to achieve our objectives?**

The new Agriculture Bill must retain and update the provisions in the 1986 Agriculture Act (Sections 17 and 18), which require the Secretary of State to have due regard to the balance between the needs of agricultural industries, economic and social interests of rural areas, conservation of the environment, including archaeology, and the promotion of enjoyment of the countryside.

This specific inclusion and the subsequent section dealing with the protection of buildings or other objects of archaeological, architectural or historic interest are vital to ensuring that there is legal force to put heritage on an equal footing with other agricultural concerns. It may be possible to update the nomenclature to include reference to the broader definition of 'historic environment' and 'heritage assets', in order to be in line with current policy language. It is currently unclear what status the 1986 Act will have after the new Act comes into force, or whether the Clause from the original act will be retained in the new Act.

It is also important that the new Bill makes good on previously stated intentions to ensure a system which is tailored to UK needs. Previously, CAP schemes have been intensely focussed on activities covered by EU Directives, which excluded the historic environment, which is entirely covered by national legislation. A new UK or devolved system would be able to pay much greater attention to these aspects of domestic legislation and policy in designing schemes and distributing public money based on a wider gamut of public benefit.

### **3. Do you have any further comments?**

Without more details it is extremely difficult to assess whether we will agree with the proposed powers. For example, 'stripping out unnecessary bureaucracy' is necessarily a good thing, but not all regulation is bad, and we are concerned that we cannot know what the intended targets of government's streamlining are until details are known.

It is also possible that a system where greater resource is spent on the administration of subsidies will be necessary, not only because we have seen a decrease in the quality of agri-environment schemes between ELS and HLS schemes and CS (2015-18) schemes in England, due in part to poor scheme design and less overall resourcing for management and administration, but also because administering the delivery of a public money for public goods model will necessarily be more complicated than administering a basic payment. It is therefore likely that more regulation will be required.

We would prefer it if, in the legislation and future development of new agri-schemes there was an assumption in favour of integrated all-farm schemes. At present, it is potentially concerning that the legislation is looking to 'create new schemes for *one or more* of the following purposes: promoting and increasing agricultural productivity and resilience preserving,

protecting and enhancing the environment, providing support to rural communities, animal and plant health and animal welfare, public access'. It may not be the government's intention, but it would be helpful nonetheless to consider how integration of benefits across all areas of environmental and agricultural management could be enabled as much as possible.