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Dear Madam/Sir,

Re: Measuring environmental change – draft indicators framework for the 25 Year Environment Plan

Thank you for the opportunity to provide a response to this consultation. The 25 Year Environment Plan (25-YEP) is the clearest statement of intent that any Government has made reflecting the desire to be ‘the first generation to leave the environment in a better state than we found it in’. The 25-YEP provides the basis for how this will be achieved.

This will be no small task. The challenges facing our environment are huge, from climate change to plastic pollution, soil quality to the beauty of our landscapes, we need to act in order to arrest the decline, and begin to turn the corner on environmental harm.

The historic environment¹ is an integral part of the wider environment. In our landscapes from the coast to the uplands, cultural heritage defines the landscape; the marks of millennia of habitation and farming has left its marks on every part of the UK. From our historic farm buildings, to field boundaries such as hedges and dry stone walls, our designated and undesignated monuments from the Palaeolithic to the recent past contribute to define the beauty of our landscapes. Historic, as well as current, management of the landscape provides the basis for most of the natural habitats that exist and is the scenery that attracts visitors and residents, contributing to the local, regional and national economy, as well as health, wellbeing, sense of place and local distinctiveness.

It is critical that the 25-YEP recognises the integrated and mutually interdependent nature of the cultural and natural environments and that its aim to improve the beauty, heritage, and

¹ The term historic environment is used extensively in planning policy and in protection regimes for cultural heritage assets, but the phrase cultural heritage is more common in environmental policy. Cultural heritage encompasses the historic environment – eg heritage sites, physical assets, landscape features – as well as broader elements of material and intangible culture and identity – eg agricultural practices, relationships to nature, landscape, customs, traditions and the arts.

engagement with the environment takes full account of the historic as well as the natural environment in how it measures progress against the goals of the Plan.

The 25-YEP recognises that; “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.”² However, **at present, the historic environment is substantially forgotten or excluded from several of the proposed indicators.** These metrics need to cover the whole environment. Other indicators propose measures which we feel are unduly narrow or potentially misleading.

DEFRA must acknowledge that cultural heritage is a significant contributor to natural capital outcomes, that it forms part of public perceptions of the environment, and must acknowledge where it is a moral imperative and an economically sensible investment³ in its own right.

We hope that our answers to the specific questions below are helpful and we would welcome further engagement with the historic environment sector to help ensure that the effective integration of this area with wider environmental aims, particularly on aims H11 and H12.

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 3,600 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

² 25-YEP p.19

³ 25-YEP p.16

membership of 500 heritage organisations who, together with thousands of individual members, represent national and local bodies encompassing state, local government, professional, academic, museum and voluntary sectors.

Specific questions:

1. *Whether the proposed framework describes the environment in a meaningful way*

In general, the proposed framework does describe the environment in a meaningful way. However, we wish to make sure that an approach to understanding the integrated aspects of the environment is clearly evident throughout the framework.

As such, we feel that additional attention needs to be given to areas (which we highlight below) where additional measurement of the condition of the historic environment and its contribution to wider benefits to the environment are required.

In short, there are 3 problems which must be consistently addressed:

- Where the historic environment is measured, ensuring that the full scope of heritage assets are considered, rather than a sub-set which could provide skewed data – e.g. taking samples of all heritage assets, rather than only designated ones)
- Where the historic environment is one part of wider environmental factors, ensuring that it is included in composite indicators (e.g. for public engagement, enjoyment, and wellbeing)
- Where benefits are overlapping or complementary, that these are recognised (e.g. that restoring historic field boundaries has benefits for wildlife, landscape etc.)

2. *Potential gaps in the headline indicators and / or system indicators and how to fill those gaps*

Our response primarily focuses on the indicators designed to support the sixth goal of the Plan; *Enhanced beauty, heritage, and engagement*. Particularly, we describe how to ensure that the historic environment is adequately integrated within the proposed indicators.

Indicator H11 – “Changes in landscape and waterscape character”

Virtually all landscapes in the UK are fundamentally the product of past and present human engagement. The historic environment, the thousands of heritage assets across the country, reflect the cultural factors which have affected that land use over millennia, shaping landscapes and defining their value. We are pleased that H11 clearly defines the contribution of the historic environment to landscape character.

The description of the measure lists a range of historic environment features including field boundaries, and traditional farm buildings. **The clear omission is archaeological landscape features**, which will be important to include in the scope of this indicator. These heritage assets can be assessed through agri-environment scheme data and through National Historic Landscape Character (NHLC) profiles, which already reference key archaeological assets and other historic landscape features. These sources of information, amongst others, provide baseline data from which to develop H11 indicators.

In addition, waterscape character also has a cultural heritage aspect, and we would welcome inclusion of inland waterscapes cultural heritage and marine underwater cultural heritage in the composite indicator covering waterscape character. For example, measurement of canals, river waterfronts and designed features of water manipulation (e.g. flood meadows) could assist in developing indicators that account for the condition of freshwater features.

Indicator H12 – “Heritage features of designated sites and scheduled monuments”

We are concerned that this indicator is not wholly sufficient as a proxy for the condition of the wider historic and natural environments. Scheduled monuments (and indeed all designated sites) account for only a tiny proportion of all heritage assets, including some of demonstrably equivalent significance to nationally designated sites but undesignated (this occurs for several reasons). While measuring the condition of scheduled assets is important, we would welcome a broader basis for this indicator.

We propose that this could be done by incorporating measures of ‘Heritage At Risk’ (HAR) – a dataset which is already well established - but developed and extended in order to take account of non-designated heritage assets. Exactly how HAR should be widened would need discussion, but it is important that it effectively measures the condition of traditional farm buildings and non-designated archaeological landscape features, as these are asset types most threatened by current practices.

We would also welcome greater clarity on what heritage assets would be assessed for their condition. At present the short description references only the condition of geological heritage features and scheduled monuments. The former is confusingly specific. We question, for instance, whether the condition of natural heritage assets such as flora and fauna should not

also be measured and would welcome specification of whether other designated heritage features are intended to be included, for example, listed buildings, protected wrecks, conservation areas and registered parks and gardens (while remaining convinced that undesignated heritage assets also need to be included in this measure).

Indicator H13 – Enhancement of green/blue infrastructure

While not expressly referenced, cultural heritage needs to be recognised as a contributor to the visual attractiveness of green/blue infrastructure, for example, the condition of underwater cultural heritage sites, which can range from shipwrecks of many periods to inundated Mesolithic landscapes in the Solent and North Sea. We would welcome consideration of cultural heritage in any programme developed to make use of citizen science techniques, thereby engaging the wider population in the delivery of the 25 YEP, for whose ultimate benefit it is.

Indicator H14 – Engagement in the natural environment

We fully support the inclusion of indicator 14 (along with H15, H16, and H17) as ones which measure people’s enjoyment and caring for the environment. This is a vital aspect of environmental management. However, as proposed **the historic environment is omitted entirely from these 4 indicators and it is vital that measures are devised to ensure its inclusion, for all the reasons given in the opening paragraphs of this response.**

The historic environment sector already collects data on levels of engagement to some degree, and this ought to be developed more strongly, along the same lines as the MENE survey. DCMS’ Taking Part survey provides the obvious vehicle to adapt for this purpose, and could easily mirror the measures used in the existing MENE model or any proposed revised version.

Certain additional data collection approaches would be required for the marine and maritime heritage to be included in this indicator, but research has already been conducted to examine how this could be achieved⁴.

H15 – People engaged in social action for the environment

As above, we are concerned that the historic environment is also not represented in this indicator. It is both entirely possible and would be extremely valuable to include measures of public engagement in social action with the historic environment within this indicator. Again, a certain amount of data already exists, collected as part of the Taking Part surveys, and from

⁴ Firth (2016) - *The Social and Economic Value of the Marine Historic Environment: Issues and Opportunities* - <https://research.historicengland.org.uk/Report.aspx?i=15854>

the Heritage Counts surveys which explore participation in the historic environment. Additional changes to these surveys to parallel changes to the MENE survey would ensure that changes in levels of engagement with the historic environment can be measured in these parallel to the natural environment. Alternatively, additional questions relating to or including the historic environment could be added to the MENE survey.

H16 – Health and wellbeing benefits

As above, we are concerned that the historic environment is also not represented in this indicator. It is both entirely possible and would be extremely valuable to include measures of health and wellbeing benefits resulting from the historic environment within this indicator. Again, a certain amount of data already exists, collected as part of the Taking Part surveys, and from the Heritage Counts surveys which explore participation in the historic environment. Additional changes to these surveys to parallel changes to the MENE survey will ensure that change can be measured in these parallel areas. Alternatively, additional questions relating to or including the historic environment could be added to the MENE survey.

H17 – Environmental attitudes and behaviours

As above, we are concerned that the historic environment is also not represented in this indicator. It is both entirely possible and would be extremely valuable to include measures of public attitudes and behaviours towards the historic environment within this indicator. Again, a certain amount of data already exists, collected as part of the Taking Part surveys, and from the Heritage Counts surveys which explore participation in the historic environment. Additional changes to these surveys to parallel changes to the MENE survey will ensure that change can be measured in these parallel areas. Alternatively, additional questions relating to or including the historic environment could be added to the MENE survey.

Indicators S8-10 – Marine

There are opportunities to ensure that monitoring of underwater cultural heritage sites and landscapes can contribute to these indicators, for example:

- S8 – measurement of impacts on historic wrecks and underwater cultural heritage and landscapes
- S9 – measurement of decline of historic wrecks and underwater cultural heritage and landscapes

- S10 – positive relationship between healthy ecosystems and historic wrecks and underwater cultural heritage and landscapes

Indicator S25 – Landscape impacts of agri-environment schemes at the National Character Area scale

Our answer to indicator H11 sets out how data on the historic environment is valuable to assessing change to landscapes and can be applied at a national character area scale. Indeed, we would welcome this indicator being included within the scope of the headline indicator for landscapes and waterscapes.

3. Whether the overall number of headline and system indicators is appropriate. Are there too many, too few?

We have no strong view on this issue, provided that all areas of the environment are effectively considered, as such we are proposing additional or expanded indicators to cover some of the areas that would not otherwise be measured.

4. The approach to bundling information in the indicators. Is it better to combine multiple data sources within summary indices or to be more selective about which data to present and assess?

We support this approach for the delivery of summary data. However, the ability to extract more detailed information on specific indicators is also useful.

5. Data that you possess which is relevant to the framework and could be shared to update any of the proposed indicators

CIfA and CBA do not hold data ourselves at the scale which would be relevant to inform the proposed indicators. However, there are a number of important data sources which already exist (see below) which provide baseline information on the current condition of heritage assets, and on public engagement with and social/wellbeing impact of the historic environment. These sources of data should be considered for development in order to feed into proposed indicators.

For example, mechanisms could be created to develop more fine-grained information on, for example, dry stone walls, as there is strong coverage of archaeological features in Historic Environment Records (HERs – these are sources of, and signposts to, information relating to landscapes, buildings, monuments, sites, places, areas and archaeological finds, usually maintained at a local authority level). Further opportunities exist to collect collate data in specific format which would enable more in depth understandings of, for example, marine and maritime heritage assets.

As stated above, the Taking Part survey does not contain as many specific questions relating to public engagement, wellbeing, and perception of the historic environment as part of its longitudinal survey, as the MENE survey does. However, it would be possible and valuable to begin collecting this data to support environment indicators H14-17. Other research, for example Heritage Counts, has partially investigated these themes at various points, which could be useful in creating a suitable baseline. However, additional work will be needed in several areas to make the baseline more comprehensive and to develop effective indicators.

Sources of data on condition of heritage assets include;

- The Selected Heritage Inventory for Natural England (SHINE) database of key undesignated archaeological landscape features, which underpins current agri-environment schemes.
- the much more extensive system of Historic Environment Records (HERs), maintained by or for local planning authorities, and from which SHINE data is drawn.
- Historic England's Heritage at Risk (HAR) project, which includes condition surveys of scheduled monuments, Grades I and II* listed buildings, battlefields, and conservation areas.
- Natural England's natural environment and landscape auditing and monitoring (which includes designated and undesignated assets).
- Historic England's historic environment auditing and monitoring (which includes designated and undesignated assets).
- the recently-completed National Historic Landscape Characterisation (NHLC) Project, and the historic seascape map.
- the statutory list descriptions of designated heritage assets (all listed buildings and scheduled monuments, and area-based designations).

Sources of data on public engagement and caring for the historic environment include;

- DCMS' Taking Part survey
- The *Heritage Counts* reports, produced by Historic England on behalf of the Historic Environment Forum.

6. How you might use the framework and which aspects of it you see as being particularly important

We have no strong view on this issue.

7. The balance and scalability between local and national levels.

We have no strong views on this.

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

Yours sincerely,



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