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- > Influencing policy

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Dear Dave Boulton,

Consultation on next Rural Development Programme for England 2007-2013

Heritage Link is grateful to have the opportunity to comment on this significant consultation which will affect the economic viability and character of rural areas for many years to come.

Heritage Link brings together a very wide range of non-government organisations¹ concerned with heritage in England. Between them they represent some 4 million members from volunteers to owners, specialist advisers, practitioners and managers to national funding bodies and local building preservation trusts. Although not all have a specific rural focus, Heritage Link has been represented on the RDR Policy Advisory Group and in order to bring together the views of members concerned with this response, established a special Task Group under the Heritage Link Funding Working Group.

Heritage Link is disappointed that it was omitted from the list of contacted organisations set out in Appendix E., in view of the fact that it is represented on Defra's Policy Advisory Group.

This response, drawn up by the Task Group is supported by 23 Heritage Link members whose names appear below. Some members felt this consultation lay outside their expertise while others are making additional responses to include issues arising from their particular standpoint. As on previous occasions, this Heritage Link response is intended to bring out the main areas of consensus and to present the collective view of the voluntary heritage sector.

General Comments

We welcome the important contribution that agri-environment programmes, and the Environmental Stewardship scheme in particular, make to the conservation and

enjoyment of the historic environment, especially in view of the challenges that it faces in the context of changing agricultural land management, economic and climatic factors. Before setting out responses to specific questions, however, we have the following generic points to make:

1. Environmental Stewardship was consulted on recently in 2004, in detail and supported by Government. It would not be justified for such a consultation to be supplanted by a brief and very time-constrained general consultation such as this. The conclusions of the earlier consultation, and the Government's commitment to Environmental Stewardship, should stand, otherwise confidence in the depth of the Government's commitment will be weakened, and with it the beneficial results of a long term approach.
2. The financial resources for the 2007-13 ERDP will be very tightly constrained. Support for the maintenance of the built historic environment and conservation skills under Theme 3 should be prioritised in the ERDP, otherwise little or no support will materialise in practice.
3. Moving responsibility for delivery from one agency, the RDS, to several, including Natural England and the RDAs puts a duty on each of these bodies to take an integrated and holistic approach to promoting sustainability, embracing its environmental, economic and social aspects, if there is to be a coherent and sustained benefit for the public and rural communities.

Overarching policy and delivery

Heritage Link welcomes Defra's commitment to the continued support for the Environmental Stewardship Scheme, since it believes that a high quality landscape, aside from its own intrinsic value, is a vital component of rural tourism, a positive backdrop for inward investment and a significant contributor to the strength of the rural economy. The UK became a signatory to the European Landscape Convention in February this year bringing new responsibilities for ensuring that landscape character is at the heart of policies for protecting and managing the landscape for communities. Within this context the historic environment is a fundamental and inextricable element of the rural landscape.

However Heritage Link is concerned that the current consultation seems to be creating an opportunity to challenge the objectives of Environmental Stewardship which were determined only very recently after extensive and detailed public consultation through the Agri-Environment Review. We do not believe that it would be productive to overturn any of the conclusions drawn from that earlier exercise, particularly as the related grant schemes have only just been introduced.

Heritage Link is also concerned that the delivery of the ERDP will not be through a single body, but will be managed by different bodies, some of which are only now just coming into formal existence. There will now be several bodies – Natural England and the individual RDAs – striving to achieve what the unified RDS was tasked to do formerly. There will be a need for Natural England to embrace social and economic considerations in its explicitly environmental remit; equally, there will be a need for the RDAs to integrate the environmental and social needs of rural areas in their objectives.

Defra is reminded that the RDAs have an objective to pursue sustainability; it is not clear how the RDAs will be able to maintain a focus on issues of sustainability particularly at the fine grain that will be required to address rural deprivation. We believe that the historic environment is an obvious means of delivering social, economic and environmental benefits. While we endorse the aim of integrating the three themes through the LEADER approach we are unclear how this will work in practice between RDAs and Natural England.

It is also worth drawing attention to the importance of agri-environment funding to the conservation of the historic environment. The historic environment and the assets of its built, archaeological and landscape heritage are not covered by EU directives, unlike the natural heritage. There is therefore a danger that consideration of the historic environment slips between departmental, national and even European agendas and fails to be included properly in integrated approaches to land management. As a consequence in the past, there has been no substantial funding for sustainable management of traditional farm buildings, historic parkland and landscape, and for rural archaeological sites and monuments. Agri-environment delivery has begun to make a significant difference in this area, and despite some initial teething problems, we strongly support the real impact it is having in this context.

I hope you will take these points into account when considering the overall impact of the Rural Development Programme.

Yours sincerely,



John Sell CBE
Chairman: Heritage Link Funding Working Group

This response is supported by the following members:

1. Ancient Monuments Society
2. Architectural Heritage Fund
3. Association for Industrial Archaeology
4. Association of Small Historic Towns and Villages in the UK
5. The Battlefields Trust
6. Campaign to Protect Rural England
7. Cathedral and Church Buildings Division, Church of England
8. Churches Conservation Trust
9. Civic Trust
10. Council for British Archaeology
11. Country Land and Business Association
12. Historic Farm Buildings Group
13. Historic Houses Association
14. ICOMOS UK
15. Institute of Field Archaeologists
16. Institute of Historic Building Conservation

17. The Leche Trust
18. Queen Elizabeth Scholarship Trust
19. Save Britain's Heritage
20. The Scole Committee
21. Society for the Protection of Ancient Buildings (SPAB)
22. The Vivat Trust
23. War Memorials Trust

Enc: Heritage Link membership showing Rural Heritage Task Group

Consultation on next Rural Development Programme for England 2007-2013

Heritage Link responses to the consultation questions

Four core principles:

Question 1: Do you agree with these four principles. If not please suggest alternatives?

Heritage Link is generally in agreement with the four principles as set out for the strategy for the next ERDP, and in particular with the commitment to the continuation of the Environmental Stewardship scheme.

Question 2: Are there any other overarching principles that should apply?

Heritage Link welcomes the commitments that are made within these principles, but is aware that the ERDP will be delivered through three separate delivery agencies, and is concerned that the different agendas of the three bodies are aligned to deliver the commitments made. We would urge the most rigorous scrutiny of this fundamental point.

Question 3: Do you agree that the proposals in this document support these?

Heritage Link believes that the proposals within this consultation document appear to comply with the overarching principles.

Complementing and co-ordinating with other policies and funding streams:

Question 4: Do you agree with the proposals for ensuring that Rural Development spending complements other policies and funding streams, in particular the EU Structural Funds and the European Fisheries Fund

Heritage Link agrees with the proposals to ensure that other funding streams are complementary and do not overlap. However, we do have a concern that the particular nature and difficulty of delivery within rural areas may create barriers to national schemes which may preclude effective delivery in rural areas.

We also have a concern for the funding gaps that do exist, and into which funding practice may fall. For example, there is quite rightly an inclination to consider the Learning and Skills Councils as the correct source of skills training. However, we believe that it would be unlikely that the small specialist companies providing traditional building skills, such as thatching, would qualify for training support. There are likely to be other examples in other areas of activity, and it is important that sufficient flexibility is allowed to be able to accommodate them as they become apparent.

Theme 1: Enhancing the Environmental and Countryside:

Question 5: Do you agree that the challenges and priorities listed under this theme are the right ones for the programme?

Heritage Link agrees with the priorities identified within this theme, and is particularly pleased to see included within it those elements of the countryside that are fundamental to both a viable agricultural industry and to rural tourism and its support infrastructure. We are pleased to see that training and knowledge transfer in environmental land management are seen as a key challenge in this context, and would urge that training in vernacular buildings skills are included within this definition.

Question 6: If not, what is missing or superfluous? (Please provide evidence for any suggested answers to this question)

Whilst we are pleased to see that traditional and historic rural buildings are listed within the priorities, we are concerned whether this prioritisation will deliver funding on the ground. The past freezing of expenditure on building grants has given the impression that such grants are almost seen in terms of a contingency within the programme, to be dropped as other needs arise. This creates an impossible situation, when good quality building conservation has to be planned long in advance. The availability of capital grants is essential in safeguarding the future of historic buildings and in securing the wider benefits they bring.

We also have a concern whether national priority will be reflected in local target statements. This resistance is generally stimulated by the comparative high costs of building works, but the Lake District study *Building Value: Public benefits of historic farm building repair in the Lake District* sponsored by Defra clearly showed the potential for small scale, ongoing repair grants.

As expressed earlier, we are also concerned that the arguments set out after detailed consultation at the time of the 2004 Agri-Environment Review may be lost in this current less fine-grained consultation. This concern is re-enforced by the fact that considerable and relevant research relating to the historic environment, some of it undertaken under Defra sponsorship, has not been mentioned within the relevant appendices of this consultation document. **Perhaps of most significance is the fact that *Heritage Counts 2005* has not been recognised as a crucial source of information on the issues and challenges that face the rural heritage.** This document provides up-to-date evidence for the state of the rural historic environment, much of which would be suited to beneficial management through Environmental Stewardship.

There is a concern about the continuing problems in providing adequate baseline information to land managers from local historic environment records, in addition to information on statutorily protected sites and building. The latter are a very inadequate proxy for what is important and characteristic in the historic landscape and for targeting Environmental Stewardship in areas where it can provide maximum environmental benefit. Many more opportunities for positive and urgent management of historic assets exist than are being identified and continuing effort is needed to resolve the mapping provision and protocols for sharing information between local authorities, Defra and farmers to provide incentive and justification for extending the Environmental Stewardship scheme's reach. The scheme is particularly valuable in encouraging the reversion of arable to pasture where introduction of new permanent grassland can provide important benefits in protecting earthwork and archaeological sites at risk from continued ploughing, as well as meeting biodiversity targets.

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In looking to the public benefits that will derive from the support measures proposed within this document, it is worth highlighting the very high public interest as well as willingness to support expenditure on the historic environment as identified in recent surveys, a fact highlighted in *Economic Valuation of Environmental Impacts in the Severely Disadvantaged Areas*, Defra's own recent research commissioned from EFTEC into public willingness to pay for environmental benefits through the uplands reward structure.

Question 7: What should the balance between priorities be?

We are very aware of the pressure on Defra to meet the European Commission's very tight deadlines. Under such circumstances we do not believe that the current consultation can be sufficiently specific to be able to establish a meaningful answer to this question at a national level.

We feel that this is particularly true for Environmental Stewardship, which has so recently had a very detailed review, and which is therefore only now in the early stages of its new structure. We believe that the 2007/08 review of Environmental Stewardship will be the time to assess the value for money of scheme expenditure and to make adjustments on this evidence.

We believe that prioritisation and targeting can be carried out more effectively at the regional and local level. In relation to this viewpoint we are particularly pleased to see the commitment to a landscape scale approach which adopts the Joint Character Areas as the basis for targeting.

Question 8: What would best enable delivery of this theme to be joined-up with delivery of other themes?

From the perspective of Heritage Link, we believe that through Theme 2 it will be possible to provide access to national and local environmental datasets and to environmental training to land managers.

Through Theme 3 the craft and land-based skills required to deliver Theme 1 will be stimulated, and in addition it will be possible to provide the resources to bring forward good quality premises for diversification of farm businesses, encouraging and giving priority to land based and closely associated activities.

Achieving this integration will help to maintain quality in heritage, landscape, and environment, all of which are major assets to the rural economies in terms of tourism and inward investment. When fostering innovative new uses in say traditional farm buildings, careful consideration must always be given to the quality of conversion as these buildings make an essential contribution to local character and distinctiveness.

Theme 2: Making Agriculture and Forestry More Competitive, and Sustainable

Question 9: Do you agree that the priorities listed under this theme are the right ones for the programme?

Heritage Link welcomes the commitment to a competitive and sustainable agriculture and forestry industries, believing them to be essential to the good environmental management of rural areas.

Question 10: If not, what is missing or superfluous? (Please provide evidence for any suggested answers to this question)

It is clear that good environmental management will only occur if farmers and other land managers have access to environmental information as well as training on environmental issues. This statement of course includes the historic environment.

The access to (on-line) national and local authority data will greatly increase the ability of land managers to develop whole farm plans on which to base their overall business management. Heritage Link believes that access and productive use of this data will be greatly increased if training in their implications and use is made available to land managers. These training modules should be included within other business training modules delivered under Theme 2.

Question 11: What other developments might shift the priorities under this theme in the course of the programme?

We are quite sure that other pressures will come to the fore over the programme period, not least the Water Framework Directive. Whatever these pressures, we hope that we have argued within this response for a continued commitment to support for measures that will benefit the historic environment, since we feel that this offers many socio-economic benefits beyond the specific funded location.

Question 12: What would best enable delivery of this theme to be joined-up with delivery of other themes?

From the perspective of Heritage Link we believe that through Theme 2 it will be possible to provide access to national and local environmental datasets and to environmental training to land managers.

Through Theme 3 the craft and land-based skills required to deliver Theme 1 can be stimulated, and in addition it will be able to provide the resources to bring forward good quality premises for diversification of farm businesses, encouraging and giving priority to land based and closely associated activities.

Achieving this programme will help to maintain quality in heritage, landscape, and environment, all of which are major assets to the rural economies in terms of tourism and inward investment.

Theme 3: Enhancing opportunity in rural areas:

Question 13: Do you agree with the challenges and priorities listed under this theme?

Heritage Link welcomes the stated proposals to foster the sustainable enhancement of rural heritage assets, and to the identification within this target of the need for access to good quality premises where these can be developed sensitively, retaining both the character of the building and its context.

We would also highlight the contribution of the historic environment to employment and sustainable tourism strategies.

We draw your attention to new Department for Culture Media and Sport's public participation survey and by figures drawn together in Heritage Counts 2005 for evidence

for the fact that a high quality rural environment is a key economic asset for rural communities. Heritage Counts 2005 also reported that places of worship play an important role in rural life and deliver a variety of benefits to local communities. Churches and chapels are one of the most familiar sights in the countryside with 60% of the Church of England's 12,200 listed parish churches situated in rural areas as defined by Defra.

In addition the National Trust's 2001 study, *Valuing our Environment*, demonstrated that a substantial proportion of jobs created through tourism rely directly on a high quality environment, particularly in rural areas.

It is estimated that there are 32,000 jobs related to the tourism activities at 680 heritage attraction sites in England. Historic houses alone directly employ 6,000 paid employees and the use of 9,000 volunteers brings additional skills and social benefits. These figures take no account of the additional employment stimulated in the local economy.

Earlier in this response we have referred to the current shortfall in skilled craftsmen in the built heritage and land-based skills sector, and for evidence would draw your attention to *Traditional Building Craft Skills: Assessing the Need, Meeting the Challenge, Skills Needs Analysis of the Built Heritage Sector in England*, which was published in June 2005 by the National Heritage Training Group. This study is further supported by a CPRE/National Farmers Union survey into the shortage of rural craft skills which was undertaken in 2005.

The potential to be able to deliver important environmental benefits as well as skilled employment from agri-environment funding has been well demonstrated by the joint Defra and English Heritage research recently published under the title *Building Value: Public benefits of historic farm building repair in the Lake District*. Heritage Link believes that RDR could be used to close the gap that exists in skills training in rural areas where single craft practitioners predominate. This is a market in which the mainstream training providers find it difficult to participate.

Question 14: If not, what alternatives do you suggest and what evidence supports your suggestion?

Heritage Link can offer no alternative suggestions.

Question 15: How do we balance focus on specific areas experiencing a particular concentrations of low pay with this problem in wider society?

Heritage Link would draw your attention to the very effective role played by heritage as a driver for regeneration.

Question 16: What would best enable delivery of this theme to be joined-up with delivery of other themes?

From the perspective of Heritage Link we believe that through Theme 2 it will be possible to provide access to national and local environmental datasets and to environmental training to land managers.

Through Theme 3 the craft and land-based skills required to deliver Theme 1 can be stimulated, and in addition it will be able to provide the resources to bring forward good

quality premises for diversification of farm businesses, encouraging and giving priority to land based and closely associated activities.

Achieving this programme will help to maintain quality in heritage, landscape, and environment, all of which are major assets to the rural economies in terms of tourism and inward investment.

The Leader Approach in the new programme

Question 17: Do you agree with the regional flexibility outlined here?

Heritage Link strongly supports the principles of subsidiarity and devolved responsibility which underpin the LEADER approach and we welcome this approach being “mainstreamed” within the ERDP, rather than being seen as a discrete funding stream.

We believe that this approach will for the first time provide a mechanism within which the huge resource represented by the private and voluntary historic sector within rural areas can be provided with the mechanism to engage with an integrated and co-ordinated approach to the challenges they face.

We do, however, have a concern that the delivery of LEADER will be through the RDAs, which have a limited track record in delivering initiatives of this type and of integrating environmental with economic objectives. We would urge that RDAs are required to involve local authorities in their evolving schemes and make use of their expertise in community level engagement.

Question 18: What is the Leader approach best placed to deliver?

It would appear that the LEADER approach can be used across all the RDR axes. However, since Theme 1 will be closely involved in the delivery of the Environmental Stewardship scheme, we believe that LEADER projects should focus on integrating measures across all three themes.

Question 19: Do you agree with the balance between national strategy and co-ordination on the one hand and regional flexibility on the other?

Heritage Link does have a concern about the balance between the national strategy and co-ordination and regional flexibility. In part this is a reflection of the concerns expressed at the beginning about the range of agencies that will actually involved in the delivery, and the danger that each of those could have divergent priorities which prevent an integrated approach to the objectives in the ERDP itself.

Question 20: Do you have suggestions for adjusting the model proposed?

Heritage Link also has concerns on the way in which the regional priorities will be established, and this concern has been stimulated by the way in which the regional consultations for this paper were developed and rolled out. It will be essential that the regional implementation planning for the ERDP will involve a full range of stakeholders and that this input will go beyond the RDAs and the Defra funded delivery bodies.

Heritage Link
May 2006