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19th May 2006

Dear Sue Adams

Consultation on the new uplands rewards structure (Rural Development Programme 2007-2013)

Heritage Link is grateful to have the opportunity to comment on this second RDP (2007-2013) consultation concerning the new uplands rewards structure.

Heritage Link brings together 81 non-government organisations¹ concerned with the 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. Heritage Link has been represented on the RDR Policy Steering Group and, in order to bring together the views of members in this response, established a special Task Group under the Heritage Link Funding Working Group.

Heritage Link has a concern for the upland areas which contain a very high proportion of the Scheduled Monuments within the country as well as some 13,000 Listed Buildings. The uplands also contain a large proportion of the traditional buildings which are such an important constituent of these distinctive landscapes. Many of these buildings are owned or managed by our members.

This response, drawn up by the Task Group is supported by 18 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

-
- > Influencing policy

 - > Underpinning advocacy

 - > Increasing capacity

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their particular standpoint. As on previous occasions, this Heritage Link response is intended to bring out the main areas of consensus as the collective view of the voluntary heritage sector.

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. Cathedral and Church Buildings Division, Church of England
7. Council for British Archaeology
8. Country Land and Business Association
9. Historic Farm Buildings Group
10. Historic Houses Association
11. Institute of Field Archaeologists
12. Institute of Historic Building Conservation
13. The Leche Trust
14. Queen Elizabeth Scholarship Trust
15. Save Britain's Heritage
16. Society for the Protection of Ancient Buildings (SPAB)
17. The Vivat Trust
18. War Memorials Trust

Enc: Heritage Link members showing members of Rural Heritage Task Group

Consultation on the new uplands rewards structure (Rural Development Programme 2007-2013)

Heritage Link responses to the consultation questions

Q.1 Which of the following four Options for a future upland reward structure do you feel will best deliver the objective of rewarding sustainable land management and the provision of public benefits in the uplands?

Heritage Link believes that the future payments being considered for upland support should be closely linked to the delivery of environmental goods.

Because of the very special nature of the uplands, and the significant environmental impacts that will be precipitated by any changes in land management, we would favour the introduction of a specific scheme for the uplands (option 2). However, we do recognise the difficulties of implementing this at the present time, and therefore would support, as an interim measure, the alternative suggestion that future payments be conditional upon entry into one of existing agri-environment schemes (option 1).

Q.2 If retaining HFA is your favoured option, please justify and explain how the existing HFA contributes in a measurable way to the delivery of Defra's priority of protecting the countryside and enhancing the natural environment, now and for future generations?

As stated above, we do not favour the retention of the HFA in its current form.

Q.3 If this is your favoured option, please state what additional environmental enhancements might be considered that do not rely on stocking density figures and which are not covered by existing agri-environment schemes?

Not applicable – see above.

Q.4 If you disagree with linking LFA support to ES or another agri-environment scheme please state your reasons.

As stated above, in the interim at least, we support the proposal to link upland support to agri-environment schemes.

Q.5 In your view, will this option provide adequate encouragement to hill farmers to enter into ES? If not, why?

It would appear to us that linking future proposed payments to the agri-environment scheme would provide an additional incentive. We are not sufficiently informed to know whether it will be sufficient to encourage greater take-up.

Q.6 Should all eligible land receive an LFA area payment or just land within an agri-environment scheme agreement? Please state your reasons.

Heritage Link believes that that only land within an agri-environment agreement should be eligible for additional area payments in order to ensure that payments are closely linked to the delivery of environmental goods, and on a whole farm basis.

Q.7 Does the system need to include a provision to enable applications from producers using tenanted or rented land? If so, why?

Heritage Link believes that the system needs to include tenanted or rented land, since the aim should be to deliver environmental benefits on a whole farm basis, and not to be a mechanism to determine the viability of one form of land tenure over another.

Q.8 If land outside an agri-environment agreement is to qualify for LFA support, how should the system ensure that that all land (common land, short term grass lets etc.) is managed sustainably?

Heritage Link believes that by making LFA payments conditional upon entering into agri-environment agreements, the mechanisms to ensure sustainable management will be inbuilt.

Q.9 The current HFA has a minimum and maximum area threshold plus differentiated payment rates based on land classifications; we would be required

to retain a maximum area threshold for a future area-based LFA payment under option 1. At what level do you think this should be set to maximise delivery of the scheme's objectives?

As indicated within the support information on this section, the location, proximity to markets and favoured enterprise will affect each of the LFAs differently, and we believe that this assessment needs to be determined at a local level.

Q.10 Should the future upland reward structure be based on environmental outcomes only as Option 2 suggests, or should there be some recognition that upland farming has production-related restrictions related to its location?

Heritage Link believes that the principle to base the upland reward structure primarily on favourable environmental outcomes is correct. However, it needs to be recognised that investment on environmental outcomes can also deliver on a range of other social and economic returns, and the design of application that maximises on these returns should be encouraged.

Q.11 Which of the three options for an Uplands Environmental Stewardship Scheme do you feel would best meet Defra's objectives? Please state the reasons for your choice.

Heritage Link believes that the Second Option – for an uplands environmental stewardship scheme – would offer the best returns on Defra's objectives. Sub-Option c - Additional Higher Level Scheme expenditure in the uplands - would be favoured because it is believed that the multiple objectives of the agreements would be preferable to the less targeted approach offered by the Entry Level Scheme.

Q.12 Is there, in your view, any reason why some farmers in upland areas would not want or may not be able to enter into ES?

Heritage Link understands that the scoring system for the Entry Level Scheme precludes certain farmers who are unable to meet the points threshold.

Q.13 Are the current ES options sufficient to buy the environmental benefits we need from the uplands? What sort of additional options might ELS and HLS cover, for e.g. peat management.

Heritage Link believe that the ELS and HLS options offer a good range of opportunities applicable to upland holdings, and that these will be increased by the introduction of the traditional farm buildings maintenance option, and the supplement for traditional breeds.

Q.14 What would the impact be on existing agri-environment agreement holders? If they were unable to access the new funding in the short term, would they be unfavourably disadvantaged?

Heritage Link believes that the current situation in the uplands is sufficiently marginal to warrant the consideration of transitional arrangements to prevent this disadvantage.

Q.15 If Government were to end specific LFA support, how in your view would we be able to retain the critical mass of hill farmers and livestock needed to care for the upland landscape and natural heritage, and preserve biodiversity (PSA target 3)?

Heritage Link believes that there are very strong environmental reasons for a continuation of LFA support.

ADDITIONAL QUESTIONS

Q.16 Should the new arrangements be introduced at the beginning of the next programming period in 2006/07 or is there a need for a transition period?

Given earlier responses, Heritage Link is of the opinion that there is a case to contemplate transitional measures.

Q.17 Options 1 and 2 are based on payment for SDA land only. Do you agree that DA land be excluded from future LFA incentive payments? If not, please state your reasons.

Despite the information supplied in the consultation paper, Heritage Link does not believe that it has sufficient information to respond to this question.

Q.18 Should Government extend LFA support to farming other than beef and sheep farming within the LFAs?

In the view of Heritage Link, since the primary outcomes of the intended reward structure are environment benefits, then the nature of the enterprise that delivers on these benefits is in principle immaterial. There may be good reasons specific to a particular location which will favour one enterprise over another, and this potential should not be restricted by a centrally determined policy detail.

Q.19 If the baseline option or option 1 were adopted, should LFA support continue to be operated on an England wide basis or is there a case for greater regionalisation including for example, regional payment rates? What changes could or should be made to tailor the system better to meet the needs of different areas, bearing in mind the additional administrative burden?

Heritage Link does not support the baseline option, and it believes that the linking of LFA support to environmental benefits based on a whole farm plan will provide a sufficient level of tailoring, precluding the need to consider regional variations in the scheme.

Q.20 Traditionally HFA and its predecessor schemes have not been taken into account for the calculation of agricultural rents, although agri-environment schemes may have done so. What, if any, will be the impact on agricultural rents of the new support arrangements?

Heritage Link does not have the information available to be able to comment on this question.

Q.21 Finally, we would welcome your views on any other issues or points that you wish to raise that are relevant to this consultation.

Heritage Link does not necessarily argue against the case made in this paper that it is not the role of public expenditure to subsidise food production. We would however urge caution on too glib a view that abandonment might be beneficial. In terms of biodiversity and heritage, abandonment is likely to have a significant effect, and it will be essential that this is properly managed to avoid the loss of features or species that are valued.

Heritage Link
May 2006