

DEFRA consultation: The 25-year environment plan – measuring progress

The Heritage Alliance

25 January 2019

Introduction: the historic environment in the 25-Year Environment Plan

Alongside environmental charities, and the public¹, the Heritage Alliance strongly supports the 25-Year Environment Plan's objective of leaving the environment in a better state², and strongly supports the need for goals and indicators to ensure that that happens.

As with the natural environment, the scale of the historic environment challenge is huge. We have already lost half of our traditional farm buildings to agricultural change and redundancy, and hundreds of thousands more are in decay. Almost half of scheduled monuments are under threat, as are stone walls, parkland, and historic field systems³. These, along with other historic structures and archaeological sites, are our shared history. They help us understand who we are and how we got here. They contribute to the richness of our landscapes and countryside, and are a vital part of the character and distinctiveness of rural places. Our historic environment sits alongside natural features, sharing the same physical spaces and facing similar challenges. The historic environment thus belongs to us all. It is also, as DEFRA's Health and Harmony consultation⁴ said, "a non-renewable resource which, once lost, cannot be recreated".

Past public policy has neglected these challenges. Although public funding for heritage has been effective where it happened⁵, it has only happened on a tiny scale. It has been heavily deprioritised by successive Governments because the EU excluded heritage from its competence and thus from EU Directives. For example, funding for the historic environment under the CAP is now about ¼ of 1 per cent of total funding, or just ¾ of 1 per cent even of public goods funding.

The 25-Year Environment Plan frankly acknowledges these past problems, saying 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". The solutions it outlines – especially transferring funding away from direct payments to environmental public goods – can be transformational.

The 25-Year Environment Plan is a huge step forward, but - as the consultation says - it needs to be translated into action. The Environment and Agriculture Bills need to ensure the setting of long-term objectives, targets, metrics, and monitoring to ensure those targets are met, and that effective measures will be taken if they are not. **The metrics need to cover the whole of the environment, including the 25 Year Environment Plan's sixth goal - "enhancing beauty, heritage and engagement..." - as effectively as they cover the other nine goals.**

Responses to the specific consultation questions

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

In general terms, yes. An important point is the integrated nature of the environment: meeting targets across the ten 25-Year Environment Plan goals will have reinforcing effects across the board. This is as true of historic environment goals as all the others. In past agri-environment schemes natural environment, heritage, and landscape gains usually occurred together.

The indicators set out in the consultation document do begin to provide a basis for assessing and monitoring the condition of the historic environment, alongside the natural environment. They need some changes, and further development, as below, to ensure that they are efficient, robust, and sufficiently comprehensive and effective. They need to be developed with, aligned with, and funded with, the indicators for the natural environment. The Heritage Alliance has not been consulted by DEFRA in their development to date, though we have offered to help, and **it is very important that the heritage sector - especially the Heritage Alliance and Historic England - and DCMS are involved in taking the indicators forward from here. We have much existing data and work to contribute (see question 5 below), and look forward to working with DEFRA, DCMS, and others on this.**

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

This focuses on the 25-Year Environment Plan's sixth goal, "Enhanced beauty, heritage, and engagement...", and particularly on indicators for heritage/the historic environment, but the issues and indicators of course overlap to a significant extent, and we are keen to be involved in ensuring that all these areas have effective indicators.

Indicator H11 – currently "Changes in landscape and waterscape character"

All landscapes are historic, and heritage is a fundamental and indivisible part of landscapes and waterscapes. As above, most of the positive outcomes in past and current agri-environment schemes have involved natural and historic environment gains simultaneously. The 25-Year Environment Plan proposals present a key opportunity to address the historic and natural environments as a seamless whole. It is important that the H11 indicator does this, especially as an indicator of ELMS' overall success.

It is clear from the consultation document that H11 is intended to, and does, include the historic environment alongside all other aspects of landscapes and waterscapes: consultation document page 23 includes, as 'distinctive landscape characteristics', traditional farm buildings and field boundaries, alongside natural environment features like woodland and semi-natural habitats; and page 38 includes 'historic environments', traditional farm buildings, and field boundaries, alongside natural environment features like woodland/tree cover.

As heritage is clearly core to H11, and that H11 will probably be the most important heritage indicator, the title of the indicator should be changed to ‘Changes in landscape, heritage, and waterscape character’ (or equivalent wording).

Archaeological landscape features are not specifically mentioned but it is important that these are explicitly within the scope of H11.

The core of the H11 indicator is (page 38) “a composite indicator of change... building on an approach developed to assess the impacts of agri-environment on landscape in 159 National Character Areas”. The recent completion of the National Historic Landscape Characterisation (NHLC) Project opens up opportunities to achieve this. Virtually all the National Character Areas (NCA) profiles already reference the key archaeological and other heritage landscape features in their description and statements of environmental opportunity. **We are keen to be involved in the continuing development of H11, building on the NHLC Project, NCA profiles, and the extensive historic environment data listed under question 5 below, including the SHINE database.**

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

The rationale of H12 does not yet seem entirely clear. H11 is (correctly) widely focused on landscape, including all types of heritage. H12 seems now to be focused on two more limited and largely-unrelated objectives: scheduled monuments, and ‘heritage features within designated sites’.

The concept and definition of scheduled monuments is clear, much data already exists, and monitoring their condition is definitely important. A potential problem however is that the great majority of rural archaeology (including some which is of sufficient importance to qualify for scheduling) is not scheduled. Moreover, scheduled monuments are probably not a good indicator for unscheduled archaeology, especially given that unscheduled archaeology is much less known and much less protected – in other words, an improvement in the condition of scheduled monuments, though obviously very desirable, could well conceal a decline in the condition of unscheduled archaeology.

‘Designated sites’ are not precisely defined under H12, but presumably mean natural environment sites, including SSSIs, SACs, SPAs, ESAs, Ramsar sites, etc; and perhaps National Parks and AONBs. Monitoring heritage features in natural environment sites is of course of value, but these sites obviously are not designated for their heritage interest, their heritage value and content will vary, and this would cover only a tiny proportion of all heritage features. Even if the definition of ‘designated sites’ included National Parks and AONBs, that would still exclude much or most heritage. Even if the definition also included all heritage designations (i.e. listed buildings, scheduled monuments, registered parks and gardens, registered battlefields, conservation areas, and World Heritage Sites), that would still exclude large amounts of heritage because most heritage, though a vital component in the landscape, is not designated or within designated sites. Moreover, again, we are not sure that ‘heritage features in designated sites’ would be a reliable indicator for heritage in general. An improvement in the condition of heritage in SSSIs,

for example, though desirable, might conceal continuing declines in the condition of heritage features elsewhere.

The emphasis of H12 should be changed to focus primarily on heritage at risk (HAR), widely interpreted. HAR (see question 5 below) has been developed over 20 years, and is an official statistic. It already includes scheduled monuments and Grades I and II* listed buildings, and some other heritage designations. The overall scope however needs to be widened, because again the great majority of rural heritage is undesignated and does not fall into these categories. Much of the information required to expand HAR is already in place (see the list in question 5 below). **Exactly how HAR should be widened needs discussion, but it is especially important that it effectively measures the condition of traditional farm buildings,** almost all unlisted. These are probably the single most threatened part of the rural historic environment. Nearly all of the perhaps 500,000 traditional farm buildings which have not already been lost or converted to new uses, are under threat, and a high proportion are already in decay.

Where the information does not already exist, some of the work of extending HAR could perhaps be done by a new volunteer ‘citizen science’ initiative, embracing both the natural and the cultural aspects of landscape. This could be a good way of involving the public in delivering the 25-Year Environment Plan.

Indicator H13 – “Enhancement of green/blue infrastructure”

This should bring in the marine historic environment. Again there might be scope for ‘citizen science’ initiatives.

Indicators H14-H17 – Public engagement

Public engagement indicators are very important, not only because this is part of the sixth “Enhanced beauty, heritage, and engagement...” 25-Year Environment Plan goal, but more especially because **it is vital that the Plan delivers public benefits, and is seen to do so, and that the Plan and its delivery, including ELMS, have the support of the public, who will be paying for this.** It is also important to deepen involvement and widen the diversity of those involved.

A major problem with these four indicators as drafted is that they appear (perhaps unintentionally) to exclude the historic environment. There is no logical reason for that, and this needs to be changed. Public interest in the historic environment is strong, and public involvement in the historic environment obviously is as important as public involvement in the natural environment.

It is vital – and wholly possible – to include the historic environment in each of these indicators. A substantial amount of data already exists in the hands of Historic England, from Heritage Counts and other surveys, and in DCMS’s Taking Part Survey. The natural environment MENE surveys provide more comprehensive measures of wellbeing, other social benefits, and engagement, and the proposed

changes to MENE should do this better, and therefore parallel changes to Taking Part, or putting the two together, should deliver substantial and self-reinforcing benefits.

For the marine and maritime heritage to be included in this indicator, some additional data collection approaches would be required, but research has already been conducted to examine how this could be achieved (see Firth (2016) - *The Social and Economic Value of the Marine Historic Environment: Issues and Opportunities* - <https://research.historicengland.org.uk/Report.aspx?i=15854>).

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

This is obviously related to H11, builds in the historic environment as H11 does (see page 55, though again archaeological landscape features need to be mentioned), and is probably the most important for the historic environment of these other system indicators. It might be better if it could be elevated to a headline indicator, helping to underpin the indivisibility of the historic environment. Our comments above in relation to indicator H11, and question 5 below, suggest some means, and also some existing datasets, that could be used to ensure the historic environment is properly integrated in this indicator.

Indicators S15, and S8, S9, S10 – water-related indicators

This usefully references heritage (presumably in the context of water quality and wetland heritage). This same inclusive approach could also be adopted by adding a simple heritage reference at least to S8 Percentage of seabed subject to high pressure from human activity (ie impacts on historic wrecks and underwater heritage); S9 Diverse Seas: threatened and declining features conserved (ie arresting decline of historic wrecks and underwater heritage); and S10 Healthy Seas (ie positive relationship between healthy ecosystems and historic wrecks and underwater heritage).

Indicator H7 - “Condition of protected sites - land, water, and sea”

If SSSIs and MPAs are explicitly referenced, this should also include scheduled monuments and designated wrecks.

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. The key point is of course to ensure that each of (and each part of) the ten goals of the 25YEP has effective indicators.

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 have no strong view on this issue. This will probably be an iterative process as the indicators are developed further.

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

It is possible to develop cost-effective and statistically-robust quantitative indicators for the condition of the rural historic environment and heritage assets. Much of this work has already been done. In particular, **there is already a great deal of evidence on the extent and condition of the rural historic environment**, though many areas are incomplete. Data which has been or is being collected which can be used to create baselines and indicators of asset condition includes (this is not a definitive list):

- (i) the extensive **SHINE (Selected Heritage Inventory for Natural England)** database of key undesignated archaeological landscape features developed by Natural England, ALGAO, and Historic England to underpin the delivery of agri-environment schemes in the last 15+ years.
- (ii) the less-focused but even more extensive system of **Historic Environment Records** which underlies SHINE.
- (iii) Historic England's **Heritage at Risk (HAR)** project, developed since 1998, covering scheduled monuments, Grades I and II* listed buildings, battlefields, and conservation areas.
- (iv) **Natural England's natural environment and landscape auditing and monitoring** (which includes designated and undesignated assets).
- (v) **Historic England's historic environment auditing and monitoring** (which includes designated and undesignated assets).
- (vi) the recently-completed **National Historic Landscape Characterisation (NHLC)** Project, and the **historic seascape map**.
- (vii) **Historic England's Historic Farm Building Photo System** provides a computer database and software program for monitoring change to the condition of listed farm buildings, potentially providing enough information to use the condition of listed farm buildings as a formal indicator.
- (viii) the **official list descriptions of designated heritage assets** (all listed buildings and scheduled monuments, and area-based designations like registered battlefields and parks and gardens and World Heritage Sites).
- (ix) A significant amount of data on **public participation in the historic environment**, including on visits and volunteering, and social benefits, is held by Historic England in Heritage Counts and elsewhere, and in DCMS's Taking Part survey.
- (x) **Historic England's research programme *Heritage, natural capital, and ecosystem services***.
- (xi) The **Countryside Quality Counts project *Tracking change in the English countryside*** (2004) sought to find a composite indicator of landscape quality, including changes to the historic environment,

based on character areas. It is now very out of date, but an updated survey on similar lines could provide much data which could be adapted for historic environment indicators.

Most of these tools have existed for years. Most are GIS-based where relevant. Within the limits of the information within them, they provide baseline information on the current condition of heritage assets, participation, and so on, and to an extent they provide indicators. For example the HAR system can be used to show the proportion of listed buildings or scheduled monuments which are categorised as 'at risk', and how that changes over time.

All this provides a firm base on which to build, but needs extension. They, for example, provide only limited data on stone walls and other field boundaries, which are almost never scheduled or listed. There is relatively strong coverage of archaeological features, especially scheduled monuments, and to a lesser extent of unscheduled archaeological features. For buildings, the HAR data only cover Grade I and II* listed buildings. Most listed historic farm buildings are Grade II, and excluded, and (importantly as above) a very large majority of historic farm buildings are not listed at all, so are excluded from most of the data sources above. As above, work will be needed on MENE and on Taking Part.

Work will therefore be needed in a number of areas to make the baseline more comprehensive, and to develop effective indicators.

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

See answers above.

An important point, obviously not specific to heritage, is that while it is important not to waste resource on unnecessary metrics, it is even more important to ensure that the metrics which are needed are provided. **If targets and metrics did not exist, or if there were no mechanisms for identifying problems and putting them right, resources would be likely to be ineffectively used. Data, targets, and indicators are therefore not an "overhead" to be minimised or eliminated; they are essential to the success of the policy,** and it is wholly legitimate to fund them from the overall budget.

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

We have no strong view on this issue.

Taking this forward

The historic environment has extensive public support, demonstrated for example by membership of heritage organisations (seven million people belong to Heritage Alliance member organisations), formal

and informal visits to heritage, and constant coverage in the media. That large constituency would be very concerned if the Bill failed to follow the lead of the 25-Year Environment Plan in giving parity to the natural and historic environments, and in ensuring that the indicators will treat the historic environment as integral to, and as important as, the natural environment.

DEFRA needs to work with all relevant stakeholders, including historic environment stakeholders as above, to take this forward. **The 25-Year Environment Plan approach, with the right goals, indicators, and mechanisms, has the potential to be transformative, to reverse decades of decline, and to achieve the aims of the Plan for both the natural and historic environments. We do not want another Government, in 25 years' time, to be saying again that "our failure to understand the full value of the benefits of environment and cultural heritage has seen us make poor choices..."**

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The Heritage Alliance and rural heritage

The Heritage Alliance is England's largest coalition of independent heritage interests. We unite more than 115 organisations which together have over seven million members, volunteers, trustees and staff. Most of England's historic environment (including more than half of rural England) is owned, managed or cared for by Heritage Alliance members. The Alliance is represented on DEFRA's Rural Development Programme Monitoring Committee, and the ELMS Tests and Trials working group. The Alliance's specialist Rural Advocacy Group has written this response.

¹ 70% of UK adults support an Environment Act to hold governments to account. Source: poll commissioned by the National Trust, summer 2018. <https://www.nationaltrust.org.uk/press-release/10-million-project-to-bring-uk-rivers-back-to-life-launched-by-national-trust-as-director-general-calls-on-government-to-act-now-on-its-green-brex-it-promises>.

² www.gov.uk/government/publications/25-year-environment-plan

³ For example, almost half of scheduled monuments are threatened by burrowing, cultivation, or scrub (Historic England, 2017).

⁴ *Health and Harmony, Evidence Compendium*, p55 (February 2018)

⁵ *Agri-Environment Schemes in England: a review of effectiveness*, Natural England (2009).