

Environmental Audit Committee Inquiry: 25-Year Environment Plan

The Heritage Alliance

28 February 2018

1. The Heritage Alliance is England's largest coalition of independent heritage interests. We unite more than 115 organisations which together have over 7 million members, volunteers, trustees and staff. The vast majority of England's historic environment (including more than half of rural England) is owned, managed and cared for by Heritage Alliance members. The Alliance is represented on DEFRA's Rural Development Programme Monitoring Committee, and the Alliance's specialist Rural Advocacy Group has written this response.
2. The Heritage Alliance welcomes this opportunity to respond to this [Inquiry](#).
3. **Ambition and Reporting**
4. *To what extent does the Plan set a sufficiently ambitious agenda across Government?*
5. **The Plan's agenda of "leaving the environment better than we found it" is ambitious. It is also ambitious for heritage, given the extent of decay of the rural historic environment. For example, half of all traditional farm buildings have already been lost, and most of the rest are decaying or derelict; large numbers of landscape features and monuments have been degraded or lost, and a high proportion of rural scheduled monuments are officially 'at risk'.**
6. **Importantly, the Plan repeatedly emphasises the importance of public goods. It also gives the natural and historic environments parity of approach, an approach which is long overdue. From both a natural environment and a historic environment perspective, we do not think there is a lack of ambition.**
7. *How far do the objectives, targets and indicators set out in the plan reflect a higher level of ambition than existing targets (including European Union targets and the Sustainable Development Goals) and current performance?*
8. **For the historic environment, it sets an almost infinitely higher level of ambition than existing EU targets, which essentially do not exist. It also implies a much higher level of ambition than current and previous performance, which was minimal: in funding terms, current historic environment spend is about one-quarter of one per cent of total CAP spend.**
9. **The Plan lacks specific targets, but it has a stated ambition of creating these relatively quickly, and of refreshing the Plan at intervals.**
10. *Are there any major gaps?*
11. **More detail is obviously needed, as above.**

12. **The main gap is in commitment to funding: the Plan’s ambitions cannot be achieved without substantial funding. We are aware that this is not likely to be greater than the current £3.3bn (£2.2bn for England) of CAP funding, but it does need to be clear that by c2022 that whole stream of existing funding will have been transferred away from per-hectare farm support to funding public goods, principally environmental public goods (including the historic environment).**
13. **We would also like to draw attention to the absence of any reference to cultural heritage in Chapter 5 on seas and oceans. This chapter rightly starts by noting that our seas and oceans are an integral part of our history, but then makes no provision for the huge wealth of historic and archaeological sites that make up our maritime past. Coastal heritage and historic sites such as shipwrecks are critically important to our economy, supporting multi-million-pound sectors including tourism, coastal recreation, diving and sea angling. It is essential that the Government’s promised review of marine targets and indicators – and its marine online assessment tool – should encompass the whole of the marine environment including cultural heritage, not just Good Environmental Status as defined by the EU Marine Framework Directive.**
14. *What would success or failure look like for the Plan?*
15. **From a historic environment perspective, decades of decline need to be halted and reversed. Funding for heritage public goods clearly has the potential to achieve this. A successful Environmental Plan would ensure an integrated approach, in which landscapes are no longer seen primarily as collections of habitats and species, but as having a historic dimension too.**
16. **Although as above the scale of past funding for the historic environment was minimal, in the cases where funding was available for the historic environment it was effective in delivering measurable outcomes (“There is robust evidence that the schemes made a significant contribution to the protection of historic features...”), and was popular both with land managers as applicants, and with the public. Two decades of evidence show what works most effectively, and much of the infrastructure needed to define and measure historic environment outputs is in place. The historic environment sector can provide methodologies for targeting, monitoring, and evaluation as robust as those provided by the natural environment sector.**
17. **Work has also been done on the potential scale of current and future need: in particular, *Assessing the costs of Environmental Land Management* (RSPB, National Trust, Wildlife Trusts, 2017) identifies a need for a public goods spend on stone walls and archaeological features of some £210m pa, as part of a total need for environmental spend of £2,188m pa (for the UK), ie about 10 per cent of the total. That moreover does not include further historic environment needs, especially the need to repair traditional farm buildings.**
18. **It is also important that public goods funding goes to land managers who provide public goods most effectively, so it should not be ‘capped’, or restricted to some concept of ‘active farmers’.**
19. *To what extent will the Government’s proposals for reporting on the Plan allow for proper scrutiny of its performance against its objectives?*
20. **The Plan appears to envisage robust targets and monitoring, but it obviously lacks detail at this stage. For the historic environment, see the previous answer.**

21. *Are the commitments to legislative action in the Plan sufficient to ensure it will endure beyond the current Parliament?*

22. This question potentially over-rates the importance of legislation. In particular the previous approach, in which environmental funding depended almost entirely on whether an activity was subject to EU Directives, biased funding very heavily towards those areas and away from others. In future, funding for public goods should not just follow legislation: it should fund public goods, goods which benefit the public which is paying for them, and which otherwise would not be provided. It should thus be driven by UK needs, not EU legislation, and by considerations of public benefit, public consultation, and measured outcomes.

23. Implementation

24. *The Plan sets out a natural capital-led approach and a principle of “environmental net gain” when undertaking development. What are the risks and benefits of adopting these approaches?*

25. We support the principle of ‘environmental net gain’.

26. However, a reliance solely upon a natural capital-led approach to demonstrating environmental debit, credit and the flow of public goods might well not adequately capture either value nor demonstrate sustainability for cultural heritage or the wider landscape. It is particularly important therefore that, as the Plan says, (i) the definition of natural capital is wide, including the historic environment, and most importantly (ii) the natural capital approach is recognised as just one of many tools to underpin environmental decision making.

27. *What steps need to be taken during development and implementation to ensure they lead to positive environmental outcomes, especially in respect of biodiversity?*

28. In the spirit of the very welcome endorsement that the plan gives to an integrated approach to the management of our environment, it is vital that the various delivery pilots – such as the pioneer projects, the 14 Area Integrated Plans, the work on developing metrics and those around the new environmental land management scheme – should adequately involve the historic environment and representatives of the heritage sector. Translating the integrated approach that the plan calls for into daily practice will not only be more efficient in respect of resourcing, but it will benefit biodiversity as much as it will benefit landscape and the historic environment.

29. *To what extent does the Plan set out effective delivery mechanisms to ensure DEFRA, other Government departments and public bodies have the resources and responsibilities to implement it?*

30. The Plan gives some examples of how more effective delivery might work but – as with the natural capital accounting approach – it is important to recognise that what is presented within it is not exhaustive. Again, we believe that integration and innovation will be particularly important for effective delivery – and we think that the “what works in practice” test underpinning the pioneer projects is also a valuable one.

31. *Where should the Government seek agreement with the Devolved Institutions to ensure a common approach across the UK?*

32. Our remit is limited to England, however we represent members who work across the UK and it is important that any changes to legislation are matched by the devolved institutions.

33. Principles and Oversight

34. *The Government has proposed an independent statutory body to “champion and uphold environmental standards as we leave the European Union”. What role, legal basis and powers will it need to ensure the Government fulfils its environmental obligations and responsibilities? How do these compare to the role of the European Institutions in the existing arrangements? What standard would it have to meet to be “world leading”?*

35. It is important that this body has a much wider remit than merely calling on Governments to comply with EU Directives and regulations (even if these have been automatically incorporated into UK law); and EU Institutions may not be a good model to copy. As in our response to Q6 above, the new body should be driven by UK needs, not EU legislation, and – especially given that the public is paying the cost – by considerations of public benefit. This new body ought to have some obligation to consider the historic environment alongside the natural environment, and also a statutory duty to consult the Government’s advisor on the historic environment, Historic England.

36. *The Plan sets out a series of objectives and the Government says it will consult on a policy statement on environmental principles to underpin policy-making after leaving the European Union. What principles should the Government include as part of that consultation? What legislation might be needed?*

37. Again, the question might imply that EU environmental principles were a ‘gold standard’ and that what is required is a means of continuing them. From a historic environment perspective (and perhaps other perspectives), EU environmental principles were far from a gold standard, and we need to do much better. As above, in terms of overall principles, the Plan is a good start, especially in giving parity of approach to the natural and historic environments. It now needs to be worked up in more detail with a wide range of stakeholders, as it proposes.

38. For further information, please contact The Heritage Alliance.

39. Contact

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41. The Heritage Alliance