



· INSTITUTE · OF · HISTORIC ·
BUILDING · CONSERVATION

Making Heritage Work

CAP Consultation
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Dear Sirs

CAP REFORM

The Institute of Historic Building Conservation (IHBC) is the professional body of the United Kingdom representing conservation specialists and historic environment practitioners in the public and private sectors. The Institute exists to establish the highest standards of conservation practice, to support the effective protection and enhancement of the historic environment, and to promote heritage-led regeneration and access to the historic environment for all.

Thank you for inviting us to participate in this consultation. Our main comments are in response to the Questions on pages 40 and 64 below. But we have a number of more specific points which relate to the fine detail of the proposals and how these might translate into fully worked-up programmes in due course. These are set out in the Annex starting on page 3.

Are the areas we outline for support under the new Rural Development Programme set out above the right ones?

We wish to give strong support for measures within the new Rural Development Programme, under Pillar 2, that will give support for landscape restoration and, under this general heading, specifically for the reuse, restoration and maintenance of historic field boundaries and traditional rural buildings.

We think the focus of the RDP should be on programmes that produce wider public benefits than mere support of agricultural practice, processes and development. It is a sad fact that many, perhaps most, traditional rural structures have no economic basis for their continued use and retention and that programmes like the RDP are needed to ensure that these important landscape features are retained.

We note that there is no specific reference to landscape or heritage in the 6 EU priorities for rural development (paragraph 5.9) beyond the single reference to 'ecosystems'. Annex C refers to landscape and heritage as being under pressure (page 95 paragraph 2) with a consequent loss of landscape character. We agree with this analysis.

Therefore we wish to support in principle your proposals for the possible content of the New Environmental Land Management Scheme (NELMS) and its proposed focus on the bulleted list of measures on page 97, in support of EU priorities 4A-C and 5D and E; in particular the 3rd bullet point "*the maintenance of landscape quality and character, including heritage*". However we have serious concerns about the detail which we think is confusing and unclear about what it is trying to achieve. This will be a serious detriment to take-up by many farmers, we feel. Please see our more detailed commentary on this in the Annex. To avoid any doubt at the allocation and implementation stages, we think that the RDP Guidance should explicitly state the eligibility of projects to reuse and/or restore traditional rural buildings and other landscape features and heritage.

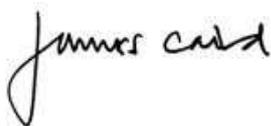
There is a good sustainability argument for the retention and reuse of buildings and other structures that would otherwise be replaced at the cost of their embodied carbon. We think that the RDP should promote, within the framework of a programme of landscape feature retention, the reuse of existing structures where it is possible for these to be married to new economic uses. Guidance on this should also be issued.

Should we transfer funding from Pillar 1 to Pillar 2? If so, should we transfer the maximum 15% or less?

We support the transfer of funds from Pillar 1 to Pillar 2 to the maximum extent, with the RDP to support landscape and heritage projects as outlined in our answer to the earlier question.

We hope these comments are helpful.

Yours faithfully

A handwritten signature in black ink that reads "James Caird". The signature is written in a cursive, slightly slanted style.

James Caird
Consultant Consultations Co-ordinator

ANNEX

CAP REFORM

Detailed analysis of the Consultation by the Institute of Historic Building Conservation

Introduction

Generally, whilst there is much of value in the proposals, there are areas of concern, notably the limited acknowledgement of the importance of cultural heritage, and in particular the built heritage, and even less in the way of concrete proposals for dealing with this very important aspect of the farming landscape. Farms have been a part of the cultural landscape since Neolithic man and the cultural landscape reflects the continuum of modification of man's impact on the landscape. Whilst it is acknowledged that the natural environment is very important to protect, it needs to be understood that the cultural environment is of equal importance.

The new environmental stewardship proposals appear to be very complex and less transparent than their ELS and HLS predecessors and it is felt that they will be much more complex for farmers to get to grips with.

Generally there is a super-abundance of income streams with differing designations which really need to be simplified if farmers are to understand clearly their options for protecting the natural and historic environment; and importance of the role of historic environment needs to be emphasised.

Of particular relevance are the following aspects.

1.12. Whilst there is acknowledgement that CAP will meet obligations on the "landscape and the historic environment" it is not fully explained how this is to happen. The transfer of 15% of funds from Pillar 1 to Pillar 2 is fully supported provided that some of this funding is allocated to the historic environment and in particular to repair of historic farm buildings.

1.17. Although the New Environmental Land Scheme (NELMS) are to be more integrated and targeted than the existing Environmental Stewardship scheme, there are concerns that the proposed scheme is too complex and geared to the natural environment alone. Whilst the importance of the latter cannot be understated, the historic environment (and in particular the historic built environment) has an important role to play in the retention of cultural landscapes. Historic farmsteads form important punctuation marks in the landscape and a landscape which is devoid of their presence is very much the poorer. It is felt that ELS and HLS are only just finding their feet and need time to develop.

1.19. Uplands are an important component of cultural landscapes and also a focus of tourism, attracting numerous visitors, whose health and well being is consequently boosted. The increase in the share of the Basic Payments Scheme is welcomed as well as Uplands remaining the recipient of targeted agri-environment grants.

1.20. Also welcomed are the grants to enable farming, forestry and land-based businesses to become efficient, but it is hoped that this does not mean the loss of traditional farming methods and retention of the traditional features of the countryside such as historic farm buildings.

1.21 & 1.22. Local Enterprise Partnership Areas funded through LEADER should also be geared to developing traditional rural building skills to enable the better repair of traditional building construction.

2.1. The new 'active farming test' is supported but the rules should be clearly set out. Many farms are still being purchased by 'non-farmers' (anecdotal evidence) and the future of cultural landscapes and traditional farm buildings remains uncertain as a result.

2.18. & Question. We support the uplift in upland payments (redistribution to support small farmers) as these landscapes are amongst the most significant in terms of cultural and historic value, e.g. stone field boundaries, stone barns as part of outfarms, and upland farm incomes amongst the lowest farm incomes. By supporting these upland farmers it is hoped that these important cultural landscapes will be protected.

2.34. It is felt that the redistribution of funds to support small farmers was capable of abuse by virtue of the deliberate purchase of small farms for purpose other than farming (e.g. equestrian enterprises, purchases of homes in a rural location etc.) but nonetheless a way should be found of supporting genuine small farmers (who could surely be the subject of an active farming test). These farmers are often helping to support the retention of a cultural landscape and traditional farm buildings.

2.38 – 2.42. We refer to the fact that a 'coupled support scheme' is not to be introduced. This could be a disincentive for farmers who have a niche market for say organic produce and by prospering engage in environmental protection measures, particularly for the historic environment. Such farmers frequently make use of existing traditional farm buildings. Surely a way can be found to support the true 'niche market' producer without artificially affecting market prices.

2.45. Raising the minimum claim size to 5 hectares is supported in order to support farmers genuinely engaged in environmental protection (historic and natural).

2.52 – 2.57 & Question. The introduction of an 'active farming test' with a threshold of 5,000 Euros is welcomed but the negative list may need to be extended. There is anecdotal evidence that land is being acquired merely to obtain the SPS but without the additional benefits of environmental improvement.

2.55 – 2.59. The reasons for not operating a 'small farmer scheme' are understood but many small farms do enable the retention of historic farm buildings and need extra help to do so. A way needs to be found of achieving this.

2.60 – 2.60 & Question. The development of a 'young farmer's scheme' is warmly welcomed as it is felt that it will encourage young farmers to consider the issues of cultural resource management. Such young farmers need to be appraised of the importance of any heritage assets in their care (built or otherwise) and the need to give them consideration for retention/new use. The issue of entitlements is best determined by farming specialists.

3) & Question – Direct Payments for Greening.

Much of this is geared to farming methods but landscape features are mentioned (without any definition) in the Ecological Focus Areas and this is welcomed. It should be stated however, that such features include archaeological features such as earthworks and buildings in the landscape and this should be set out in the Focus Areas. Areas of short rotation coppice is another important inclusion as it preserves traditional skills in woodland management and produces potentially useful traditional building materials for historic building repair e.g. thatching spars.

5) The Rural Development Programme. This is the main focus of IHBC interest

5.9. There is no mention of historic environment, cultural landscapes or historic buildings in the six priority areas (neither in Annex C). The priority areas also need further definition. Knowledge transfer could also reflect the need to transfer knowledge about traditional rural building methods and skills to future generations via an apprenticeship scheme (see below for further comment on Annex contents). The main objectives include only improvement for the natural environment but the cultural environment, reflecting man's impact on the landscape is just as important and needs to be overtly stated.

5.16 & Question. The introduction of SWOT analysis concerning where best to focus Rural Development Funding is of some concern. Despite what is set out in Annex C the criteria need to be clearly set out and be open and transparent. The issue of how to make the system simpler and less bureaucratic can only be answered by analysing how it has worked in the past and what improvements can be thus be made. Certainly opportunities for supporting the historic environment in rural England appear to have been missed in the past and this needs to be acknowledged and brought forward for consideration in the future.

5.29. There is a fleeting mention here of support for investment in the historic environment but this is not reflected in the rest of the document and methodologies for addressing this important issue are not set out.

The meaning of 'landscape scale change' is obscure and needs actual definition. It is important that farmers are not confused by obscure terminology.

5.31. The two main types of agreement which are to replace ELS and HLS need to be much more clearly set out (if they are too being adopted at all). **Farmers need continuity and certainty in their dealings with environmental protection, not constant change. The constant changing of a system is not conducive to long term considerations of management of a cultural landscape.**

We deduce from the Consultation Document the types of agreement are proposed as:-

- a) Site specific e.g. SSSI/SAM – Upper Tier (equivalent to HLS we suppose?)
- b) Area-based – targeted improvements including landscape scale co-ordination. (equivalent to ELS we suppose?)

These appear to be less well defined than ELS and HLS and this will be considerably more confusing for applicants.

The fact that access to the upper tier is by invitation only is also a matter of concern as is the emphasis on existing customers. Other potential applicants may be discouraged. It cannot be the case that everything that needs to be known about historic and cultural landscapes in England is completely known and understood. There has to be room for more investigation and other possibilities.

5.33. The meaning of "the adoption of selection criteria which would favour the choice of the right options" is totally obscure. Criteria need to be carefully set out. The same goes for the meaning of "the national targeting framework".

Inclusion of capital items is welcomed but there is no mention of traditional farm buildings and there needs to be. Farmers need to be clear about what can be applied for.

5.34. There is lack of clarity on the 'framework to enable groupings of farmers' to get together in order to be able to communicate their 'need'.

5.35 & Question. **The reduction of land coverage from 70% to 35-40% is more than disappointing. The main purpose of ELS has been to inject improvements into the bulk of the landscape and this proposal represents a considerable retraction from this stance. The landscape scale approach appears to be convoluted and unnecessarily complicated and it is unclear how it will work. It is unclear how groups of farmers or land managers will be brought together to deliver abandoned (apart from a saving in funding by a reduction in the landscape area covered). IHBC favour a continuation of the existing ELS and HLS scheme.**

5.35 – 5.36 & Question. There is an admission that some holdings (and hence historic environment) will be excluded and there is even specific mention of the inevitable exclusion of features of archaeological and historic interest) but that these could be covered by a capital grant scheme. It is felt that if this all that can be offered then it is to be warmly embraced but there needs to be specific mention of historic farm buildings and it is all a poor second to retaining the existing HLS and ELS. **It is fundamental that a capital only grant scheme should make up the deficit and should include traditional farm buildings. The proposed scheme elements are confusing and should be made clearer for potential applicants.**

5.39 – 5.40 & Question. Agreements for 5 years are of very limited value to farmers. Most farmers want some degree of certainty for at least 10 years. The simplest approach to targeting needs to be adopted and the criteria clearly set out. Farmers cannot deal with 'uncertain criteria'.

5.41. The benefit of on-line advice is extremely doubtful other than setting out a basic tool-kit. Farmers work best when dealing face to face with advisers and talking things through. It is not understood what is meant by 'third parties'. This should be explained. This is particularly true when dealing with cultural landscapes, historic features and historic buildings.

5.43 & Question. This is very unclear. The entry requirements for the scheme need to be made absolutely clear. At present this is far from the case. The question of entry scheme requirements needs to be carefully addressed in this document rather than being put out as a query.

5.46. Upland Farming – the loss of Upland Entry Level Stewardship is very regrettable.

5.47 & Question. The Campaign for the Farmed Environment – support for this is welcomed. Farmers need to feel valuable as food producers and not just keepers of the landscape whilst at the same time making a contribution to environmental improvement.

The current grant scheme should be continued and the retention and re-use of traditional farm buildings should be encouraged.

5.56 & Question. Innovation needs to build upon existing partnerships.

5.57 Advice. There is no substitute for local advisers with knowledge of the landscape. Mentoring of young farmers by older farmers should be considered.

5.61 Delivering Rural Economic Growth. We welcome local enterprise partnerships but under 5.64 we would like to see a reference to “traditional building construction knowledge and skills in rural areas”.

5.65. Examples of groups other than farmers and land managers would be useful.

5.72 & Question. LEADER needs to be targeted at making best use of rural resources e.g. redundant rural building for employment in order to stem the tide of residential conversion. The latter only results in a temporary boost to the rural economy whilst use of such buildings for employment provides a continuous source of rural income.

5.73 – 5.74. Loans may be useful in some circumstances.

6) Inter-pillar transfer- a 15% transfer is supported.

6.27 & Question. Rural Economic Growth is fundamental to supporting existing cultural historic landscapes and building which are themselves the product of millennia of man’s impact upon the landscape. The proportion of RDP spend is probably best distributed equally between Environment, Farming Competitiveness, Growth and LEADER.

Annex Data.

Annex A – There is no mention of historic environment, cultural landscapes or historic buildings and there should be.

Annex B – ditto.

Annex C

Fostering knowledge transfer can apply to traditional farming skills e.g. use of horses in difficult terrain requiring the stabling of horses in traditional existing stables, and to the use of traditional construction skills using traditional building materials e.g. cob or timber framing.

Forestry skills include woodland management for the production of traditional building materials.

Village Renewal is mentioned but will it include conservation of village features e.g. a preaching cross?

The priority is stated as restoring the natural environment and the failure to mention the historic environment is most regrettable.

There is a reference to changing management practices having led to the loss of landscape character and cultural heritage (traditional field patterns) and to cultural heritage including traditional farm buildings. **This needs to figure more prominently in the document as a whole and measures overtly set out to prevent further loss. The omission of these aspects in the document as a whole is a major concern as these features are indeed important for local distinctiveness and tourism. It is commented upon in the document that the historic environment provides a major contribution to the rural business economy.**

Priority 5 mentions the focus on maintaining landscape quality and character including heritage, but this is not fulfilled in the document as a whole.

The comments regarding skills shortage are agreed but it needs to be understood that this also includes traditional building skills.

Conclusion

There is a some mention of cultural heritage but it needs to be brought to the fore in a more overt way and measures put in place to address its conservation are some somewhat sparse and need to be firmly addressed.

CR 28/11/13