



## INSTITUTE OF HISTORIC BUILDING CONSERVATION

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Defra  
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Ergon House  
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Dear Sir/Madam

### **CONSULTATION ON THE DRAFT RURAL DEVELOPMENT PROGRAMME FOR ENGLAND 2007-2013**

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.

The Institute welcomes the opportunity to comment on the Consultation Paper.

The Institute is pleased to see the recognition, in paragraphs 483-485 of the value of heritage assets to rural culture and development, and the specific references to it in Axis 2 and 3 programmes. In the Institute's view the maintenance of historic buildings, sites and landscape features is crucial to the future of rural communities and their economies in this period of environmental change and rapidly developing agricultural practice. Recent rural development programmes have brought benefits to the historic environment, but, in these times of rapid change and competing interests, many of which are of acknowledged importance, the Institute wishes to see past achievements built upon. We hope the following detailed points may be reflected in the final Programme document.

Page	Para	Comment
1 31	6 87	The Institute supports the growing of perennial crops for renewable energy provided that there is no direct effect on the historic environment such as field enlargement (removal of hedgerows), deep ploughing (removal of archaeological deposits) and impact of large machinery for cultivation on narrow lanes and hollow ways. Oil seed rape may be a particular problem in this respect. All of these aspects have a bearing on the setting of historic buildings and make up the greater component of the historic environment upon buildings depend for their interpretation.
18 20	40 52	Some attempt is clearly being made to get to grips with the evidence base for rural areas with the statement that "many rural areas e.g. SW England, are characterised by high rates of out-migration by young adults as well as high rates of in-migration by the over 30s". The IHBC believes that these are often weekly commuters and in sparsely populated areas the elderly and retired. The IHBC comments that this shift is at the very nub of the issue in contributing to the changing face of the countryside, and is evidenced by an apparent high number of farm sales. Such a rate of change is bound to have an effect on the rate of change of the features of the countryside that make up the historic environment. It is uncertain if the document is entirely getting to grips with this major issue. 'Agriculture's declining economic status' is felt

Page	Para	Comment
		to be more absolute than relative, and the statement “comparative advantages of rural areas in low productivity industries such as personal social services for older people” seems to reinforce this argument.
30	Fig. 3.6	The Institute presumes that the 19% of land not otherwise specified includes equestrian culture and hobby farms, which appear to be becoming increasingly popular and will in their own way have an effect on the historic environment. The Institute previously raised the need for an evidence base with particular reference to the use of the farmstead and continues to promote this necessity. The ELS may well provide this but care needs to be taken to ensure that records generated by the ELS are accurate, and capable of analysis in this respect.
32	88	The acknowledged “diminishing size of the dairy herd” is having a particular effect on the prosperity of farms in the SW resulting in considerable numbers in decline and being purchased by incomers ignorant of farming methods. There may be long-term disbenefits to the management of the landscape if land is left idle, and more pertinently if buildings are left idle, with the result of possible loss.
34	90	Increases in woodland cover will generally benefit the landscape, particularly
35	92	broad-leaved species, as long as any new areas are assessed for potential damage to historic environment.
40	103	The Institute recognises that efficiency in farming is an important factor but
	104	not to the detriment of traditional farming that may be better at conserving traditional landscapes and groups of traditional buildings. Smaller farms can certainly make a contribution in this respect.
41	109	It is a matter for concern that diversified income is more important than income earned from farming, as regards the conservation of traditional landscapes, unless the diversification is itself allied to traditional farming.
49	122	The Institute welcomes the potential to improve the economic performance of forestry by improving the skills base, as this will provide a boost to traditional woodworking skills, and aspects such as the possible repair of timber framed buildings, other traditional buildings and the potential for creating sustainable buildings suitable for the historic environment.
61	152	New markets for wood fuel encourage a traditional way of life, more suited to
70	188	the retention of the traditional buildings and their wellbeing, and the creation of sustainable buildings – all of which is welcomed by the Institute.
62	156	The Institute urges that data starts to be collected for diversification within agriculture e.g. specialist food crops, as these may prove to be the very backbone of future traditional farming, so essential to the protection of historic landscapes
50	124	The Institute welcomes initiatives that promote collaboration between
	-127	farmers and farmers co-operatives as this is seen as a way of retaining traditional farming and family farms, so essential to the conservation of the rural landscape. Some family farms are of considerable longevity i.e. from the 1920s, and represent a fund of knowledge about the farming techniques of previous generations as well as little known aspects of the historic environment.
58	144	The Institute has a concern about the age profile of the agricultural workforce, and the fact that the entry rate is much lower than the exit rate. There is a need for traditional grazing to protect historic landscapes and a need for knowledge transfer on a range of specialisms not least the management of traditional grasslands. The opportunity to achieve this is receding, and the Institute feels that more could be done to facilitate knowledge transfer.
63	159	The Institute agrees that a key challenge is to increase the ability of farmers to meet the demands for added value food products and the need to increase support for training and knowledge transfer, with a view to retaining traditional farm holdings. It is essential for traditional farming to survive if the historic environment associated with traditional farming is to survive.

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71	190	There is a concern about payments for less favoured areas (hill farm, moorland or common grazing) shifting progressively from historic entitlement to area based by 2012, i.e. to Severely Disadvantaged Areas (SDAs), particularly as it is noted that this may result in adverse environmental impacts and possible land abandonment. There is a concern about the validity of the conclusions reached by Cumulus Consultants, that there is little current risk of widespread land abandonment. As stressed previously by the Institute, hill farm management is at the very core of traditional upland landscape management, and the maintenance of traditional farm buildings associated with the same. In addition the social structure of the uplands is integral to the way it performs its traditional role. In short the Institute is concerned that support should be limited to the most marginal areas.
76		The Institute welcomes the initiatives on biodiversity but stresses that there often appears to be an emphasis on this in Farm Environment Plans in contrast to a rather lesser emphasis on the historic environment, thus creating an imbalance. The FEP consultants appear to be better trained in ecological matters, than in recognition of the built and historic environment, and appear to be heavily reliant on the Historic Environment Record for the area in question. The latter may well be deficient in relevant aspects. It is thus essential that there is better training for FEP consultants in on site recognition of the built and historic environment.
98	318	Growing trees producing a 'carbon sink', short rotation willow coppice and
-101	321	biomass fuels can be beneficial to retaining traditional historic landscapes as
	322	long as special care is taken to avoid any adverse effects.
105	358	Organic farming has great affinity with traditional historic farming especially in the realm of permanent pasture. The Institute welcomes the conversion of livestock producers to organic farming, especially in the SW where there is a danger that the loss of traditionally grazed land, will have a detrimental impact on the historic landscape.
106	361	In addition to the management of marginal and upland permanent pasture is important to maintaining traditional upland landscapes.
108	374	The Institute is concerned about the loss of ancient semi-natural woodland. It is an essential component of historic parkland and a factor in understanding the origin and development of timber framed buildings. The evidence for the latter can be fragmentary within surviving buildings, making the link with adjacent surviving ancient woodland even more important, e.g. areas of Dorset such as Marnhull and Sturminster Newton.
109	381	It is heartening to hear that the loss of hedges has stabilised. Ancient hedges, and even enclosure period hedges are essential to understanding the origin and development of historic landscapes, and new planting, however laudable cannot compensate for this loss.
110	383	The recognition of the serious impact of agriculture on historic environment
	-284	(archaeological remains, historic and designed landscapes and historic
112	387	buildings) is warmly embraced, as is the research, which has itemised the extent of loss. Of particular relevance is the acknowledgement of the loss and vulnerability to damage of "unmaintained non-domestic buildings on agricultural holdings" (as well as historic parkland). Buildings have a major significance in the landscape, but this is the first time that the scale of the problem regarding historic farm buildings has been recognised. <b>The Institute would make a pleas for careful monitoring of this situation.</b> (see also page 119, para 407)
112	388	The statistics presented on access serve to illustrate the importance of the
-113	-400	historic environment to the quality of life.
115	406	The Institute remains concerned regarding the risk of abandonment of farms and lack of appropriate management, as this may result in the loss of historic environment, in particular domestic and non-domestic buildings on the farmstead. There are many instances where both house and farm-buildings are unlisted and become prey to demolition and the creation of large new houses on the site. This is particularly true in Dorset, in both the rural and peri-urban situation.

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118	Table RB20	A very welcome entry.
120	144	This is the crux of the matter. The rapid change in farming systems is at odds with the conservation of the historic landscape unless the RDP can exercise a dominant role in managing the change.
121	415-418	The Institute recognises the broader role of agriculture in the food chain plus the need to promote this in areas where economic performance is below average. It recognises that farming and land-based industries contribute to the social fabric of communities and to the wider environment that supports quality of life. In this role the historic environment plays no small measure.
122	422	The Institute remains concerned about the skills shortage in traditional building repair. It remains difficult to find craftspeople to repair wooden windows and doors, for example, by cutting out and splicing in, a key factor in retaining essential elements in historic buildings. There are difficulties with dissemination of information on the whereabouts of craftspeople and initiatives in this respect would be welcome. By-trades were traditionally the preserve of the farming community in earlier periods (small farmers were carpenters or builders). The Institute would welcome initiatives to recreate this position again.
128	440	The Institute reinforces the need for databases on all forms of diversification. The Institute also welcomes the recognition that tourism plays an important part in underpinning economic strength as well as having links with agriculture. Both are important to supporting the historic environment.
130	454	Advances in ICT also underpin economic strength, and this factor also may play a role in allowing much of the built historic environment to be utilised and hence conserved.
131	464	The dependence of the rural sector on the motor car remains a thorny
132	468	problem. The increase in traffic in rural areas in the last ten years is not commented upon but it does exist and has had a detrimental effect on historic environment, as well as creating adverse living conditions in villages, and erosion of features such as hollow ways. The latter are an important feature of historic environments.
134	480-482	The limited supply of affordable housing in rural areas is often exacerbated by the trend for small traditional units of housing becoming sought after second homes. Whilst this can facilitate the retention of small houses, it promotes and accelerated degree of change that often results in the loss of historic features.
		<b>Principal Issues</b>
134	483-485	The Institute echoes the need for the impact of tourism on historic fabric to be managed effectively, and concurs with the lack of craftspeople for the repair of historic buildings (e.g. thatchers, specialist builders etc). The latter is a major issue in the discussion of human potential in rural areas, and the formation of Local Strategic Partnerships (LSPs). The latter may be particularly useful in solving the skills shortage as they can act as a vehicle for central Govt. funding, via the Rural, Social and Community Programme.
		<b>The Institute welcomes initiatives in this direction.</b>
139	508-512	LEADER+ has been very successful in some areas in promoting programmes to stem the loss of rural skills – a definite success in the bottom-up approach has occurred in Dorset with the Dorset Centre for Rural Skills (DCRS) but the Institute strongly urge that there should be more emphasis on this aspect in LEADER.
142	515	The Institute firmly believes that the main objective of the RDP is to secure a sustainable farming for England, as this is the primary means by which traditional farmed landscapes will be conserved.
144	526	The Institute agrees that the cultural environment has an intrinsic value that is difficult to monetise but that it does support economic activity and that this includes increased employment.
		<b>Axis 1</b>
148	537	The Institute is concerned that the farming community may misinterpret the

Page	Para	Comment
	table 3-45	constant references to farm modernisation (on this and other tables) in the role of diversification and other areas of rural development, and that this means that there have to be clear measures to mitigate against the potential loss of the cultural environment. Farm modernisation since the 1970s has been something of a death knell for all aspects of the historic environment for aspects such as traditional farm buildings and hedgerows. Any danger that this could happen again needs to be mitigated against. The Institute takes comfort from the recognition that the growth of the market for energy crops needs to have minimum impact on the rural environment.
151	544	The Institute is concerned about the loss of the family farm and the lack of inducement for younger members of the farming families to take over the reins. Care needs to be exercised when encouraging retirement to see that sufficient inducements exist. There is a body of experiential evidence (authors own research in Dorset and Shropshire) that features in farmhouses and farm buildings survive better on family farms than when incomers take over. A body of research needs to be undertaken on this aspect. <b>Axis 2</b>
152	Table 3-46	With regard to initiatives to grow the market for energy crops, the Institute concurs with the need for intervention to ensure that this is in keeping with local character, and the need to respect historic features, in order to satisfy the requirements of landscape conservation, in the objective of the measure of agri-environment payments.
155	560	The Institute is grateful for the recognition of the value of agro-forestry schemes in traditional parkland. <b>Axis 3</b>
156	table 3-47	The Institute welcomes diversification and economic development by virtue of conservation and upgrading of the rural heritage, plus skills acquisition, all with a view to preparing and implementing a local development strategy. It would be advantageous if the growth of micro-businesses involved the use of skills in the repair of traditional buildings, see that statement "provision of training for traditional artisan skills where there is no mainstream provision" and the recognition of the need to supply competent craftspeople to maintain traditional landscape features. The Institute points out that this must include buildings as well as features such as dry stone walls. Rural tourism targeting niche markets based on the built heritage is particularly welcome.
163		The Institute welcomes the strategic priority of "maintaining and enhancing landscape quality" and "protecting the historic environment", the latter particularly during day to day operations.
168		The Institute particularly welcomes the rural development regulation measures for skills and conservation but would need to know more about village renewal before making comment on the latter. Many villages have their origin at the Norman Conquest or before and their historic form needs to be carefully researched before any major intervention. <b>Axis 1 measures not used in England Programme</b>
175		The Institute feels that there should be measures to encourage younger members of family farms to take over the farm, as in this way the traditional pattern of farming life, continuity in the countryside, and retention of historic landscapes is often best provided for. Closely allied to this are incentives in food quality schemes, as this in practice, appears to be the way that many family farms survive. The Institute is thus disappointed that these are measures that are not included.

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177	614	The Institute are disappointed to note that the list of eligible activities for vocational training does not appear to include building repair.
204		The eventual removal of the Hill Farm Allowance from all but Severely Disadvantaged Areas is regretted as hill farmers are guardians of some of the finest upland landscapes in England, containing traces of early field systems preserved by centuries of grazing. The measure mentioned on page 205 acknowledges the importance of these upland landscapes. <b>The Institute urges a reconsideration of this policy.</b>
211		<b>Agri-Environment Payments</b> The Institute urges that the consideration Historic Environment be uppermost in the consideration of improvements to the environment via the agri-environment schemes. It urges that the conservation of historic landscapes and their features be regarded as being of equal value to the protection of biodiversity. It welcomes the objective of the measure “the protection of the historic environment, focusing on field monuments and vernacular buildings” (particularly the latter) and urges that both are regarded as being of equal value in the landscape.
230	913	With regard to HLS there is a particular need to ensure that consultants undertaking Farm Environment Plans (FEPs) have as much grounding in understanding the Historic Environment as they do in ecological issues. It is important that field recognition of the monuments and vernacular buildings is regarded as being of the same importance as field recognition of ecological features. This to ensure that there is not total reliance on Historic Environment Records (HERs) as the latter are often constructed on variable bases and can be deficient in an all embracing covering of the countryside.
216	812	There remain concerns about the emphasis on ecological matters rather than the Historic Environment in ELS, also the emphasis on archaeological sites rather than buildings in the HLS.
218	828 -829	The Institute feels that ELS and HLS should both have an emphasis on traditional non-residential buildings and that the end product of maintaining rural skills should embrace very firmly the repair of traditional buildings in rural England.
231	918	The Institute welcomes a revision of the system for scoring HLS applications with the preservation of traditional agricultural landscapes as a priority, and commends the restoration of buildings as an operation to be supported. (Page 237). There are however, concerns over the use of the word restoration, and its possible interpretation as total rebuilding using the same or similar materials. Such actions are not in line with the established Ethics of Conservation as set out by the Conservation Charters and established conservation texts such as the “Conservation of Historic Buildings” by Sir Bernard Fielden. These ethics commend an over riding principle of minimal intervention, taking action only to extend life, and this is an important issue that needs to be addressed.
272	1119	The Institute welcomes the protection and care of the historic environment in woodland, as an amenity value to be enhanced, but again the principle of minimum intervention should apply.
273	1122	
276	1138	The promotion of equestrian activities is questioned without further investigation of the evidence for the actual impact on traditional farming landscapes, but the eligible activity of including traditional trade required to maintain and enhance the landscape is appreciated.
279	1147	
288		Village Renewal and Development which includes an initiative to renovate important village buildings for alternative economic or wider community use is welcomed but there should be an emphasis on the need to work with local Conservation Officers within Local Authorities. Leader Project Officers should be positively encouraged in this direction.

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290	1191 -1200	The inclusion of the conservation and upgrading of the rural heritage as an eligible activity is welcomed, particularly the inclusion of research associated with maintenance, restoration and upgrading of the cultural heritage, including cultural features of villages and the rural landscape, but the Institute would like to know more about the mechanics of how this is going to operate before commenting further.
294	1210	With reference to skills acquisition and animation with a view to preparing a local development strategy, the Institute would like this to include education on the understanding of the historic environment, in any area under consideration. This is particularly important for local communities who appear to undergoing a constant changeover in householders (experiential evidence) and who need to be made aware of the importance of historic features they may own or manage.
298	1235	It is felt that the procedure for the selection of operations by local action groups needs more definition.

The Institute would be grateful if these comments could be taken into account and would be happy to provide relevant expertise and comment should more detailed work on heritage issues in rural areas be undertaken.

Yours faithfully



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