

Response ID ANON-6JAU-FGDF-D

Submitted to **Environmental Land Management: policy discussion**
Submitted on **2020-07-24 16:25:05**

Introduction

1 Do you want your responses to be confidential?

No

if you answered yes to this question please give your reason :

2 What is your name?

Name:

Dr Vince Holyoak

3 What is your email address?

Email:

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4 Where are you located?

Please select:

Remote

5 Who are you?

Please select:

Other

Please specify:

Historic England, Arms length body sponsored by DCMS

consultation questions

6 Do you have any comments on the design principles on page 14? Are they the right ones? Are there any missing?

Please leave your comments below:

We would stress the importance of continuing to ensure that the value of the historic environment – which, in conjunction with the natural environment, is a key factor in defining the character and distinctiveness of our land – is fully reflected nationally and locally within scheme priorities.

Currently, this does not appear to be the case in respect of the messaging stemming from work such as Tests and Trials, the ELM Stakeholder events and on scheme design more generally. We feel this is a missed opportunity and a risk to delivery if the historic environment is not integrated during these formative stages of scheme design.

7 Do you think the ELM scheme as currently proposed will deliver each of the objectives on page 8?

Please leave your comments below:

In the same way that (in the context of the Environment Bill) references to identifying the potential trade-offs between improving the natural and historic environments have been a concern to us, and to the wider historic environment sector, the reference on page 8 to “prioritising between environmental outcomes where necessary” is worrying.

Having learned the lessons from taking such an approach in ESA and CSS schemes (specifically that Scheduled Monuments and other heritage features were less likely to be in favourable condition when falling within an agreement than land outside agreements) - a key principle of ES and CS is the “no detriment rule” - simply that achieving one environmental objective should not prejudice another. We think it vital that this and the multi-objective principle are retained within ELM. To not do so will reintroduce inefficiencies and additional costs (associated with subsequent remediation), and potential damage to the historic environment features themselves.

In pursuit of these principles – and ensuring the best possible environmental outcomes - we particularly endorse the need for clarity and for appropriate advice.

8 What is the best way to encourage participation in ELM? What are the key barriers to participation, and how do we tackle them?

Please leave your comments below:

By ensuring that everyone has an opportunity to participate rather than restricting participation geographically, thematically (in terms of environmental outcomes), or according to sector. Although there will be particular priorities, every farm or forestry holding and urban green space has something to contribute.

Ease of application and clarity will also be fundamental. The iterative nature of changes and improvements to CS also led to uncertainty and confusion, and in so doing, themselves acted as a barrier to participation.

We also need to make sure that advisors are equipped with the relevant skills and guidance to enable them to support participation across all the themes of ELM. In order to encourage participation, good, relevant and personalised communication is required. Direct, practical and pragmatic specialist communication with land managers leads to better results.

It may also be appropriate to encourage farmers and land managers by adopting traditional farming community rewards. The agricultural community has always enjoyed a sense of pride, and a little healthy competition locally, in being able to participate in awards relating to good land management practices across the range of scheme objectives, which could be made at County agricultural shows.

9 For each tier we have given a broad indication of what types of activities could be paid for. Are we focussing on the right types of activity in each tier?

Please leave your comments below:

For Tier 1 in particular, and in respect of establishing baseline conditions, we suggest that it would be helpful to include a reference to avoiding farming activities that are damaging to the environment (on the basis that avoidance in the first place is more effective and sustainable than subsequent mitigation).

Acknowledging these are examples only, we don't therefore agree with the suggestion that historic environment feature management would be limited to Tier 2 and above only. Previous ES and CS schemes have identified not only that historic environment features can benefit from favourable management within the context of entry level schemes, but that scheme cross-compliance or entry requirements can also bring measurable protection outcomes (eg. by preventing deliberate damage or destruction).

10 Delivering environmental outcomes across multiple land holdings will in some cases be critical. For example, for establishing wildlife corridors or improving water quality in a catchment. What support do land managers need to work together within ELM, especially in tiers 2 and 3?

Please leave your comments below:

We would argue that the same is required in order to sustain and enhance landscape character (including historic character), in which context, not only will technical advice be required, but some form of facilitation, accompanied by training and support for the participating land managers through the duration of the agreement. We suggest that the best approach is to define an area (such as an NCA, catchment, AONB or National Park) and to appoint a facilitator. The facilitator will pull together a group of stakeholders (including land managers, communities, technical specialists, other stakeholders etc) to discuss the nature of the environmental challenge and local priorities, with a view to producing a local delivery plan. Developing a consensual plan will also help land managers to have a clear understanding of the targets, the desired outcomes and any restrictions or prescriptions.

11 While contributing to national environmental targets (such as climate change mitigation) is important, ELM should also help to deliver local environmental priorities, such as in relation to flooding or public access. How should local priorities be determined?

Please leave your comments below:

As above, we suggest that local facilitation is the most effective route to determining local priorities. The North Devon Pioneer ELMS Trial, being managed by Natural England, is an excellent example of the effectiveness of facilitation, with high levels of public engagement and landowners subscription, supported by local specialist expertise.

We believe that the Opportunities/Statements of Environmental Opportunity section of each relevant National Character Area profile would be a good starting point for discussion (in that they are already available "off the shelf" and are comprehensive in their coverage of multiple environmental objectives), accompanied by consultation and opportunities mapping with local stakeholders. They do not currently include all scheme objectives, but could be expanded to do so.

12 What is the best method for calculating payments rates for each tier, taking into account the need to balance delivering value for money, providing a fair payment to land managers, and maximising environmental benefit?

Please leave your comments below:

While income foregone was a useful means of calculating payment levels, it did not in our view take sufficient account of the need to pay higher rates in order to incentivise and sustain particularly desirable outcomes. We therefore suggest that premiums (over and above income foregone) are paid to incentivise actions which are otherwise unlikely to be adopted. For heritage, this might include premiums for undertaking scrub control and maintaining and repairing stone field walls. Similarly, in the past, those within Less Favoured Areas received premiums for both their support and agri-environment payments in recognition of the disadvantages they faced. We suggest that this should continue in setting the payment rates for a new scheme.

13 To what extent might there be opportunities to blend public with private finance for each of the 3 tiers?

Please leave your comments below:

Currently, we are not clear as to the extent to which other measures (such as Conservation Covenants) will align with ELM.

It would also be useful to know how the UK Shared Prosperity Fund might work (in terms of funding projects for economic regeneration which might also achieve environmental objectives) in conjunction with ELM. Under the RDPE socio-economic and environmental objectives were well aligned, particularly through strands such as LEADER. Should the decision be taken to go down the local facilitation route for identifying and delivering ELM, we suggest that giving these groups (rather than just LEPs) access to UKSPF money would be a sensible way of joining up the processes.

14 As we talk to land managers, and look back on what has worked from previous schemes, it is clear that access to an adviser is highly important to successful environmental schemes. Is advice always needed? When is advice most likely to be needed by a scheme

participant?

Please leave your comments below:

Good quality advice leads to better environmental outcomes and to greater value for money. Advice is always needed – but the nature and extent of the advice is dependent upon the environmental outcomes desired, and the difficulty (in terms of scale or complexity) of achieving it. For heritage, the number of features brought into favourable management using a “hands off” approach (via the Entry Level Scheme) outweighed the detrimental impacts upon a few (which arose from a lack of 1:1 advice). We are currently trialling this approach to heritage in respect of the CS Online Offer.

For capital works in particular, it is likely that 1:1 bespoke advice will be required.

With regard to the historic environment, advice can be characterised in terms of that needed to support and comply with statutory processes, and non-statutory advice to secure optimal environmental outcomes, value for money and reduce risk. We believe there is a need for both under ELM.

Where a hands-off approach is deemed appropriate, it is important this is accompanied by accessible guidance and materials to support the applicant in the delivery of scheme objectives.

15 We do not want the monitoring of ELM agreements to feel burdensome to land managers, but we will need some information that shows what’s being done in fulfilling the ELM agreement. This would build on any remote sensing, satellite imagery and site visits we deploy. How might self-assessment work? What methods or tools, for example photographs, might be used to enable an agreement holder to be able to demonstrate that they’re doing what they signed up to do?

Please leave your comments below:

In terms of photographs to demonstrate compliance – it is important that these are submitted and curated electronically. We are aware that there is no systematic process for curating the photographs submitted in support of the traditional farm building maintenance options (to either demonstrate eligibility in the first instance, or compliance when under agreement). This evidence would have value for determining not only progress against agreed targets, but also the scale of the remaining challenge.

Tools such as simple condition surveys, accessibly written, delivered online & accompanied by photographic evidence, could be used as supporting evidence, which could report against baseline condition criteria collated at the start of an agreement.

16 Do you agree with the proposed approach to the National Pilot? What are the key elements of ELM that you think we should test during the Pilot?

Please leave your comments below:

The Ministerial Heritage Statement (2017) made the commitment:

After the UK has left the European Union, we will continue to offer protection to our precious landscapes and rural heritage. We will work across government to continue to protect rural historic sites and features, enhancing the character of our beautiful landscapes and supporting geodiversity.

In light of this, our experience in collaborating on the delivery of current and previous schemes and the ELM aspirations around Beauty, Health and Engagement, we think it vital that Historic England – as the Government’s statutory adviser on the historic environment – is recognised as a delivery partner in the development and management of the National Pilot. Opportunities for innovative thinking around the delivery of heritage – target 6 in the 25 Year Environment Plan – have in our view been largely overlooked in the initial ELM tests and trials phase.

Given the range of public goods that our heritage generates (engagement through public access and education, traditional skills, wellbeing, sense of place, beauty and enhanced scenic value, tourism, the reuse and adaption of historic or traditional structures for farm business diversification, community benefits or as habitats), we would strongly urge that this potential is reflected in the national pilot.

17 Do you have any other comments on the proposals set out in this document?

Please leave your comments below:

We have no further comments to make.

Consultee Feedback on the Online Survey

18 Overall, how satisfied are you with our online consultation tool?

Very satisfied

Please give us any comments you have on the tool, including suggestions on how we could improve it. :