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9 September 2016

RE: CIfA response to Environmental Audit Committee inquiry into the Future of the Natural Environment after the EU Referendum

Dear Ms Creagh,

Thank you for the opportunity to provide evidence to this enquiry. Our evidence is supplied primarily in order to underline the allied interests of the historic environment sector in protecting the provisions of EU policy, such as the Common Agricultural Policy's Pillar Two, the Environmental Impact Assessment (EIA) Directive, and EIA Regulations. Primarily this response relates to agri-environment schemes which have been extremely significant to improvements to rural heritage protection.

The most vital point is to stress the importance the broad vision for land management which is adopted in the UK which recognises the overlapping influence of agriculture, ecology, rural communities, place, and cultural and natural heritage in rural development. We strongly believe that caring for our heritage is good farming practice, and this activity also benefits the wider community.

As well as agri-environment funding, other funding streams such as the LEADER programme have also been important for rural development and have helped to not only protect historic environment assets, but also build better relationships between farmers, land managers, local businesses, and communities. LEADER focusses specifically on issues such as tourism and supporting cultural and heritage activity as part of a diversification of rural income sources to support growth.

In summary our evidence seeks to:

- Emphasise the proven success of the integrated management of the natural and historic environment through agri-environment schemes, and the UK's leadership in Europe in this regard, as well as the potential for any future protection programmes in UK nations to develop beyond restrictive separation of objectives for cultural heritage and the environment which are contained in some EU regulation
- Highlight the potential to improve parity between natural and historic environment objectives in Countryside Stewardship, as was previously the case with the Environmental Stewardship scheme
- Guard against any further cuts to the budget for landscape and heritage within programme budgets for Countryside Stewardship

For these reasons we are keen for the Committee to recognise the importance of working alongside Ministers from DEFRA, DCLG, and DCMS as well as delivery partners Natural England, Historic England and the Association of Local Government Archaeological Officers, in order to ensure that any changes to the principles of environmental protection do not lead to historic environment and cultural protection being subject to dislocation from environment policy, or to fall between the cracks in new funding programmes.

We also strongly support the role that CAP and other EU Directives, as well as funding programmes, plays in the natural environment, however, we defer judgement on these elements which are outside our core competence for the purpose of this review.

We have set out our comments in answers to a number of the specific questions in the terms of reference for the inquiry, below.

About the Chartered Institute of Archaeology

CIfA is the leading professional body representing archaeologists working in the UK and overseas. CIfA promotes high professional standards and strong ethics in archaeological practice, to maximise the benefits that archaeologists bring to society, and provides a self-regulatory quality assurance framework for the sector and those it serves.

CIfA has over 3,300 members and nearly 80 registered practices across the United Kingdom. Its members work in all branches of the discipline: heritage management, planning advice, excavation, finds and environmental study, buildings recording, underwater and aerial archaeology, museums, conservation, survey, research and development, teaching and liaison with the community, industry and the commercial and financial sectors.

Specific questions

- 1) To what extent do initiatives to support biodiversity in the UK depend on CAP-related payments?*

Before the introduction of CAP Pillar Two and the establishment of its Greening initiatives, the consensus top threat to the archaeological heritage was generally deemed to be that posed to rural archaeological assets, particularly as a result of unsympathetic or unsustainable agricultural practices – the cause of which could generally be drawn to a lack of understanding of the nature of heritage assets and a lack of funding. Whilst this threat remains, the operation of stewardship schemes has vastly improved the identification of assets and their significance; systems to improve understanding have often led to greater valuation by farmers and landowners, and greater involvement of local communities. This benefit is, of course, enabled by having the finances available to support expert assessors, training, guidance, and subsidy to landowners who engage in positive conservation and land-management practices. Without such support, it is possible that some land-owners (particularly those who have gained greater awareness of environmental issues over the course of previous stewardship schemes) would continue to support natural and historic conservation, however, given the economic reality of

farming and land management, it is likely that most conservation benefits would be quickly reversed as the need to maximise earnings through environmentally unsustainable practices would resume.

2) What risks and opportunities could developing our own agri-environment policy and funding present?

We would be concerned that any domestic replacements for agri-environment policy and funding would fail to reach the same level of joined-up thinking, with the historic environment and wider community and place initiatives left out. In recent years the disparity between the natural and historic environment objectives in stewardship schemes in England has increased, largely due to overall budget cuts, but with impacts disproportionately impacting the historic environment.

That being said, UK approaches to agri-environment schemes are still hailed across Europe as leading the way in terms of integrated management of the natural and historic environment. There is a huge potential to build on this integrated approach. In European policy terms, the cultural heritage and environment are much more distinct than they are in UK schemes, particularly in England, and it is to the credit of successive Governments that this integration and broad understanding of rural environments has been retained.

A post-Brexit vision for agri-environment schemes could move beyond some of the more restrictive aspects of the European EIA regulations, where the understanding of an integrated environmental management is concerned, and more strongly embrace a holistic vision for rural land management. This could be hugely beneficial for the historic environment.

We hope the Committee recognise the benefit that comes from this broad landscape vision for environmental protection which includes both natural and cultural heritage and recognises the overlapping and mutually dependent spheres of biodiversity, cultural heritage, rural economies, and communities.

3) What are the positives/negatives of current schemes (e.g. Countryside Stewardship) that should be retained/avoided?

In practical terms, agri-environment schemes have enabled Government objectives to reduce heritage at risk, with figures for English rural at-risk assets being reduced by a third over the period of operation of the schemes, largely as a result of the use of incentive management payments.

This mechanism is the primary way that rural heritage assets outside the control of the planning system (where the 'polluter pays' principle provides the majority of funding for the protection of heritage assets) and has been extremely effective in reducing the harm done to the historic environment. That being said, harm to heritage assets as a result of agriculture remains one of the top causes of harm to heritage assets, and any further erosion or omission of historic environment objectives in agri-environment schemes could be damaging.

In England, this success is enabled by close working between local historic environment and archaeological specialists (most often employed by local authorities) and the operation of the SHINE dataset, which is used to create whole farm plans of historic assets in order to design stewardship schemes.

However, it should be noted that post-2008 revisions to agri-environment programmes have seen a distinct loss of parity between natural and historic environment aims. Budget cuts to the programme have disproportionately targeted historic environment provisions, with funding decreasing from £20 million at its highest to just £3 million.

Importantly, in the renewal of the Environmental Steward Scheme into Countryside Stewardship the historic environment objectives were downgraded to secondary status. We would strongly urge that any future iteration of this scheme restored parity in this sense.

4) How should future UK agri-environment support be administered, and what outcomes should it focus on?

The current ministerial responsibility for agri-environment schemes lies with the lead department for the natural environment in each of the UK nations, and we see no reason why this should change. However, recognition of the shared benefit arising from the schemes should necessitate involvement of culture and communities departments in the production of guidance, and there should continue to be arrangements for collaboration between delivery partners in the historic environment to continue to have an influence on the programme. In England, this is well exemplified by working relationships between Natural England, Historic England and local historic environment partners.

There has been great benefit derived from the collaboration with historic environment records (HERs) across England in the creation of the SHINE (Selective Heritage Inventory for Natural England) database – which draws data from the system of local authority managed HERs. Stewardship schemes should continue to make use of local authority historic environment expertise in this way, and this review should recognise the mutual benefit that derives from this.

5) What are the prospects and challenges for future environmental stewardship schemes in the devolved administrations? How much divergence in policy between the nations of the United Kingdom is likely? How can divergence be managed?

Current devolved environmental stewardship schemes in Scotland and Wales are already somewhat different, but all conform broadly within EU CAP programme priorities and levels of funding. It is possible that different principles could be emphasised to a greater extent in devolved programmes, or different levels of funding allocated.

In some respects, greater freedoms to explore programmes which are unrestrained by EU guidance could enable devolved nations to tailor schemes better based on geographical and agricultural priorities; for example, greater focus upon upland land and heritage management in Scotland, or special mechanisms for developing working relationships with the more limited number of land managers.

We look forward to the Committee's comments on this important subject and hope that there is agreement that the future of the natural environment after the EU referendum needs to preserve the positive engagement across the wide spectrum of natural and historic environment protection, in any future guise.

If there is anything further that we can do to assist, please do not hesitate to contact us.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'P. Hinton', with a stylized flourish at the end.

Peter Hinton BA MIFA FSA FRSA FIAM

Chief Executive, Chartered Institute for Archaeologists