

Response ID ANON-8UYC-6N6Y-V

Submitted to **Support for Agriculture and the Rural Economy - Post Brexit Transition**

Submitted on **2018-08-15 11:02:56**

Direct Payments (Pillar 1)

1 Do you agree with the stability approach described here? Please provide comments.

Do you agree with the stability approach described here? Please provide comments.:

We welcome the stability approach described in the consultation document. In particular we welcome the commitment to there being no rolling back of environmental standards.

We strongly recommend that the developing rural policy for Scotland adopts a broad definition of 'the environment' which includes the historic environment. Natural and cultural aspects of the environment are inextricably linked and the historic environment is a product of these interactions over time.

Current standards should not be diminished, indeed we would welcome any opportunity to expand upon them to address risks to the historic environment and capitalise on the benefits it can provide. The historic environment is part of the broader environment and we recommend that it is also protected and where appropriate enhanced as part of the comprehensive new rural policy envisaged here. This ties in with the Scottish Government's National Performance Framework. The national outcome for the environment which states that we value, protect and enhance our environment. This is supported by an indicator relating to the state of historic sites. Scotland's future rural policy will be an essential strand in the delivery of this outcome.

The vast majority of Scotland's nationally important designated historic environment assets lie in rural areas: these include three World Heritage Sites, the vast majority of over scheduled monuments, listed buildings, sites on the Inventories of gardens and designed landscapes and historic battlefields. There are also over 300,000 undesignated historic assets, many of which survive in the soil matrix and/or form part of the historic environment's significant contribution to Scotland's landscapes: which includes historic features, traditional buildings, field systems, plantations, landscapes largely produced by past land management practices, places with significant cultural associations, etc. It is important to emphasise that historic environment assets are non-renewable and once lost, are lost forever.

Our Place in Time (OPiT), the historic environment strategy for Scotland, describes the contribution the historic environment makes to shaping a bright future for Scotland and land managers and farmers are key stewards of this asset. OPiT highlights that the historic environment is a critically important and ultimately sustainable resource for the people of Scotland and there are many ways in which it contributes today to a flourishing, healthy, and dynamic country. The historic environment makes a significant contribution to our identity and sense of place, well-being and economy. Evidence suggests that a well maintained environment contributes to wellbeing and quality of life. This is true for both the 'natural' and 'cultural' elements. For example 93% of adults agree that "when trying to improve local places it is worth saving their historic features" and 71% agree that they are "interested in the history of the place where I live" (Taking Part, 2007/8).

Furthermore, Scotland's historic environment contributes an excess of £2.3 billion to Scotland gross value and 2.5% of Scotland's total employment and makes a significant contribution to Scotland's places and landscapes.

We would advocate the use of broader terminology in any developing policy to ensure that a holistic approach is taken to the environment recognising that today's landscapes are the result of human interaction with the environment. Natural and cultural benefits and outcomes are often interdependent and we would recommend that this is reflected in any new rural policy for Scotland.

The sustainable use of the historic environment forms a key strand of the Scottish Government's policies and plans relating to climate change and the circular economy and we recommend that this is drawn out in the developing rural policy for Scotland.

2 How might the annual application process for direct payments be adjusted to deliver with a lighter touch for those with little year-on-year change in their business?

How might the annual application process for direct payments be adjusted to deliver with a lighter touch for those with little year-on-year change in their business?:

No comments.

3 Are there operational changes in our delivery of Direct Payments that you would like the Government to consider during the transition period?

Are there operational changes in our delivery of Direct Payments that you would like the Government to consider during the transition period?:

In the context of the level of uncertainty within which the policy is being developed, particularly in relation Pillar II funding, we would suggest that any operational changes to Direct Payments may need to take into account avenues which may be lost under any changes to Pillar II. The loss of Pillar II funding and address ways in which these Schemes could be incorporated under a different system.

4 Do you support the continuation of some or all CAP rules on inspections and compliance during the Transition period, bearing in mind that Scotland will still need to comply with the rules of the World Trade Organisation (WTO)?

Do you support the continuation of some or all CAP rules on inspections and compliance during the Transition period, bearing in mind that Scotland will still need to comply with the rules of the World Trade Organisation (WTO)?:

No comment.

5 Do you have any suggestions for straightforward changes that would improve the environmental outcomes achieved through greening payments in Pillar 1?

Do you have any suggestions for straightforward changes that would improve the environmental outcomes achieved through greening payments in Pillar 1?:

As noted in response to question 1, the vast majority of Scotland's heritage assets – both those designated being nationally important and those of regional and more local importance – are located in rural areas. It is likely that a significant number of such sites lie within 'greening' areas. We would welcome the opportunity to work with you in developing a policy for greening that improves the environmental outcomes to be achieved under such a scheme.

6 Considering how funding is currently distributed across CAP schemes, do you have initial views about how the balance between these schemes should change in future to maximise outcomes?

Considering how funding is currently distributed across CAP schemes, do you have initial views about how the balance between these schemes should change in future to maximise outcomes?:

We welcome proposals to test ideas to improve the environmental performance of Scottish agriculture. In the context of the stated aims of any new rural policy where there would be no rolling back of environmental standards, we would welcome any opportunity to expand upon this to address risks to the historic environment and to capitalise on the benefits it provides. We would suggest that change need not be major and could build on information and initiatives already existent. This is not about prevention, as this is addressed through compliance, but about the better management and celebration of our heritage, so it can be passed on to future generations. We consider any improvements could be delivered through Pillar II, although we note the uncertainties around this funding stream as noted in response to question 3. We would welcome the opportunity for involvement in the development and testing of ideas in relation to the area.

7 Do you agree that changes to capping are a useful measure to enhance the positive social and environmental impact of agricultural policy?

Do you agree that changes to capping are a useful measure to enhance the positive social and environmental impact of agricultural policy?:

No comment.

8 Do you have any specific views on how capping should work including what a maximum cap should be?

Do you have any specific views on how capping should work including what a maximum cap should be? :

No comment.

9 Should there be a maximum cap on the total funding a business receives from all schemes, or a scheme-by-scheme approach?

How can the aims of LFASS be better achieved/would you prefer to see alternative methods of providing support?:

No comment.

10 How can the aims of LFASS be better achieved/would you prefer to see alternative methods of providing support?

How can the aims of LFASS be better achieved/would you prefer to see alternative methods of providing support?:

No comment.

11 Would you see value in directing future LFA support through other existing Direct Payment Schemes?

Would you see value in directing future LFA support through other existing Direct Payment Schemes?:

No comment.

12 Do you think there are administrative and operational simplifications that would benefit current or future LFASS claimants?

Do you think there are administrative and operational simplifications that would benefit current or future LFASS claimants?:

No comment.

13 Would you support a simplified approach to scheme use of map information or to the land mapping system and, if so, do you have views on where the main opportunities for doing so would lie?

Would you support a simplified approach to scheme use of map information or to the land mapping system and, if so, do you have views on where the main opportunities for doing so would lie? :

We would support a simplified approach to scheme use of map information. PASTMAP contains information on the location of all scheduled monuments and of other heritage assets. It will be important that this information is included in any simplified scheme. Historic Environment Scotland also has a Field Officer programme which could help with the implementation and monitoring of long term improvements to the map based information available for the historic environment. This could also help to improve scheme outcomes in relation to environmental improvements. We would be happy to assist with the development of improvements to mapping.

14 Do you support the use of regional pilots to help tailor schemes to local circumstances?

Do you support the use of regional pilots to help tailor schemes to local circumstances? :

No comment.

15 Do you have views on how the inspections regime could be made more efficient while retaining existing public benefits?

Do you have views on how the inspections regime could be made more efficient while retaining existing public benefits? :

No comment.

16 Do you have views on how the penalty regime – particularly around fairness, transparency, the maintenance of standards and compliance burden – could be improved in the short-term?

Do you have views on how the penalty regime – particularly around fairness, transparency, the maintenance of standards and compliance burden – could be improved in the short-term?:

We would welcome the opportunity to engage in discussions to see how future agri-environment climate scheme compliance could be streamlined and aligned with our enforcement procedures in relation to damage to designated scheduled monuments.

17 Are there specific issues you think the Simplification Task Force should prioritise for review?

Are there specific issues you think the Simplification Task Force should prioritise for review?:

Whilst recognising the need for simplification we consider that it is essential to ensure that benefits for the historic environment are not lost and that any opportunities to improve public value of the scheme in relation to the historic environment are captured. We would be happy to work with the Simplification Task Force on developing and testing possible changes in relation to public value.

18 Do you agree with the proposals to set a timescale of up to five years for transition? Please provide comments.

Do you agree with the proposals to set a timescale of up to five years for transition? Please provide comments.:

We welcome the timescale proposed.

19 If new schemes seek to encourage collaboration, enhance skills development, help with capacity building, facilitate wider integration into the supply chain, promote carbon audits and monitoring of the soil health, how might pilot projects be best designed to help test and develop new approaches?

If new schemes seek to encourage collaboration, enhance skills development, help with capacity building, facilitate wider integration into the supply chain, promote carbon audits and monitoring of the soil health, how might pilot projects be best designed to help test and develop new approaches?:

We would welcome any opportunities for collaboration and to work with you in developing pilot projects to test and develop new approaches for carbon audits and the monitoring of soil health. Further information on the relevance of the historic environment to these matters is provided as part of our response to question 20.

20 Many of the measures described in this consultation will have co-benefits for both agricultural productivity and for reducing Scotland's Greenhouse Gas Emissions. Are there other practical and feasible measures that would have similar co-benefits that you feel should be considered?

Many of the measures described in this consultation will have co-benefits for both agricultural productivity and for reducing Scotland's Greenhouse Gas Emissions. Are there other practical and feasible measures that would have similar co-benefits that you feel should be considered?:

We welcome the recognition of the contribution of Scotland's agriculture sector to the delivery of a low carbon economy. However, it is vital that any proposals to address climate change take into account the need for adaptation as well as mitigation.

Scotland's soils provide a wide range of environmental, economic and societal benefits. This includes preserving cultural and archaeological heritage. This is set out in the Scottish Government's Soil Framework. Soil erosion was highlighted through Scotland's Climate Change Adaptation Programme as being an unmanaged risk. Many soils that act as carbon reservoirs are also key features of or are key to the preservation of the historic environment. We would welcome being involved in order to demonstrate the benefits of preserving these soils and to assist in developing methods that will easily and practically allow farming without significantly impacting upon these deposits.

21 Do you agree to expanding the number and role of Monitor Farms or similar during the transition period? Do you have any ideas as to how Monitor Farms could be refined or adapted to better meet future needs?

Do you agree to expanding the number and role of Monitor Farms or similar during the transition period? Do you have any ideas as to how Monitor Farms could be refined or adapted to better meet future needs? :

We would welcome involvement in future conversations around Monitor Farms participation and idea testing for Agri-Environment Climate scheme replacement. For example, there is the potential to have a Monitor Farm with a specialism in environmental (natural and historic) good practice.

22 Do you agree with the proposal to look at moving towards a more performance based approach to compliance, using key performance indicators and better information?

Do you agree with the proposal to look at moving towards a more performance based approach to compliance, using key performance indicators and better information?:

Land management plans and training have the potential to significantly assist delivery of benefits to both farmers and the environment if developed using a holistic approach and a broad definition of the environment which includes historic aspects. Where appropriate the historic environment should also be considered as part of plans. We would be happy to work with you to develop key performance indicators for the historic environment and to provide further information.

23 Do you have views on the types of indicator that should be used or areas of priority action within the operation of current CAP schemes?

Do you have views on the types of indicator that should be used or areas of priority action within the operation of current CAP schemes?:

We hold data on the condition and risk of scheduled monuments and the extent of their mapping. This enables us to quickly respond to consultation, make specific recommendations and monitor the impacts of any resultant scheme affecting, positively or negatively, scheduled monuments. Equally we have an aerial mapping programme which is monitoring the loss of soils over sub-surface archaeological remains and landscapes and wider scale landscape change, with its impacts on specific landscape assets. These could be used to both inform and monitor any new initiatives such as this.

In light of this, we recommend that a suite of indicators for the historic environment is included. We would be happy to assist in their development.

Scottish Rural Development Programme (Pillar 2)

24 Given the importance of continuity of support for the forestry sector and that the target for new woodland is to increase to 15,000 hectares by 2025, should the current the Forestry Grant Scheme continue broadly in its current form until 2024 or can you suggest other short-term changes that would better achieve these policy aims?

Given the importance of continuity of support for the forestry sector and that the target for new woodland is to increase to 15,000 hectares by 2025, should the current the Forestry Grant Scheme continue broadly in its current form until 2024 or can you suggest other short-term changes that would better achieve these policy aims? :

Forestry can have significant irreversible impacts upon our landscapes, historic sites and their settings. Current guidelines are key to ensuring the impacts upon scheduled monuments are considered and minimised as part of this process. There are, however, concerns about how well integrated non-scheduled archaeology is integrated into this. It is imperative therefore that any changes fully consider this, continue with the current approach to the historic environment, and seek improvement to help address wider concerns about the historic environment, including landscapes.

25 In considering the current Forestry Grant Scheme, are there opportunities to improve the administrative efficiency of the scheme?

In considering the current Forestry Grant Scheme, are there opportunities to improve the administrative efficiency of the scheme? :

No comment.

26 Given the importance of continuity of support for environmental outcomes, should the current Agri-Environment Climate Scheme continue broadly in its current form until 2024 or are there short-term changes that could be introduced to i) simplify and streamline the scheme, ii) improve customer experience and/or iii) enhance the delivery of environment and climate change objectives?

Given the importance of continuity of support for environmental outcomes, should the current Agri-Environment Climate Scheme continue broadly in its current form until 2024 or are there short-term changes that could be introduced to i) simplify and streamline the scheme, ii) improve customer experience and/or iii) enhance the delivery of environment and climate change objectives?:

Currently the historic environment is only considered where it would have commensurate benefit for natural environment interests. This limits the scope for supporting farmers and land managers in improving or managing the historic environment. We consider that short term changes to the scheme to enhance the delivery of environment and climate change objectives by including the historic environment in its own right. Such a change could be implemented using supporting evidence such as mapping and monitoring. This would help the emerging rural policy to achieve better compliance with other Scottish Government priorities and outcomes for example for communities, well-being and the economy.

27 Are there new emerging environment or climate change priorities that need particular focus under the Agri-Environment Climate Scheme in the next three - five years?

Are there new emerging environment or climate change priorities that need particular focus under the Agri-Environment Climate Scheme in the next three - five years?:

As noted above, we consider that the benefits the historic environment delivers to the rural economy and to broader environmental and social aims justifies its inclusion as priority in its own right under the Agri-Environment Climate Scheme. We understand that there has been a decrease in the number of applications and that the percentage of awards given is not commensurate with the amount of monuments on agricultural land. Currently funding only applies to designated sites. We would welcome the inclusion of the wider historic environment in the scheme's objectives, eligibility and criteria.

28 Considering the current New Entrants Capital Grant Scheme, are there opportunities to improve the administrative efficiency of the scheme?

Considering the current New Entrants Capital Grant Scheme, are there opportunities to improve the administrative efficiency of the scheme?:

No comment.

29 Considering the CAGS in its current form, are there opportunities to improve the administrative efficiency of the scheme?

Considering the CAGS in its current form, are there opportunities to improve the administrative efficiency of the scheme?:

No comment.

30 Should the scope of what can be funded be reviewed, for example in terms of adding in new elements and restricting total spend on some projects?

Should the scope of what can be funded be reviewed, for example in terms of adding in new elements and restricting total spend on some projects?:

We would welcome a review of what could be funded through this scheme. In particular, we recommend broadening the definition of the environment in the scheme objectives to specifically include the historic environment. Traditional skills are a key aspect of maintaining the quality and sustainability of the historic environment.

31 Do you have initial views on the proposal to close the Small Farms Grant Scheme?

Do you have initial views on the proposal to close the Small Farms Grant Scheme?:

It will be important to ensure that there is no detriment to the availability of funding for capital projects relating to traditional farm buildings through the closure of this programme.

32 Would there be customer benefits if the CAGS, small farms capital grant scheme and the new entrants capital grant scheme were combined?

Would there be customer benefits if the CAGS, small farms capital grant scheme and the new entrants capital grant scheme were combined?:

No comment.

33 Considering the current FPMC scheme, are there opportunities to improve the administrative efficiency of the scheme?

Considering the current FPMC scheme, are there opportunities to improve the administrative efficiency of the scheme?:

No comment

34 Would you wish to see other aspects of this scheme changed in the short-term?

Would you wish to see other aspects of this scheme changed in the short-term?:

No comment.

35 Do you have views on priority issues to be considered by any pilots during the transition period?

Do you have views on priority issues to be considered by any pilots during the transition period?:

No comment.

36 Is the LEADER approach something that you could support?

Is the LEADER approach something that you could support?:

Yes – we support the approach outlined in the consultation paper.

37 Considering LEADER in its current form, are there other opportunities to improve the administrative efficiency of the scheme?

Considering LEADER in its current form, are there other opportunities to improve the administrative efficiency of the scheme?:

LEADER has been a key provider of support to local communities in enhancing their historic environment assets and releasing their contribution to their sense and pride of place, economies, etc. LEADER is perhaps the third most significant funding partner for historic environment projects behind Historic Environment Scotland's grant schemes and the Heritage Lottery Fund. A revised scheme should include measures that maintained and/or enhanced that contribution. We would be happy to participate in the development of the scheme.

38 Do you have initial views on the proposal that SRDP broadband support would cease?

Do you have initial views on the proposal that SRDP broadband support would cease?:

No comment.

39 Do you have any thoughts on the form, content and delivery methods for future advice?

Do you have any thoughts on the form, content and delivery methods for future advice?:

The uptake of specialist advice plans through the Integrated Land Management Plans (ILMP) system is unclear. We note that there is a consensus for a greater role and knowledge transfer in future in a number of areas identified in the consultation document including for a number of environmental aspects. Given the key stewardship role that farmers and land managers play for the historic environment, we recommend that the range of advice on offer is expanded to include the historic environment.

We would be happy to assist in developing such advice with the Farm Advisory Service to ensure that the value and contribution of the historic environment to achieving public benefit and wider environmental and social aims including mitigating climate change is recognised and that ILMP take account of the historic environment issues in the round. We would be happy to work with you to develop these issues and to provide training and capacity building where required.

40 Do you have any views on the balance of advice delivered by one-to-one and one-to-many methods?

Do you have any views on the balance of advice delivered by one-to-one and one-to-many methods?:

No comment.

41 Do you have any views on how delivery of advice can be better linked to delivery of results?

Do you have any views on how delivery of advice can be better linked to delivery of results?:

We would be happy to work with you on developing a suite of indicators for the historic environment to better link advice giving on this topic to the delivery of results.

42 Considering the Knowledge Transfer and Innovation Fund (KTIF) scheme in its current form, are there opportunities to improve the administrative efficiency of the scheme?

Considering the KTIF scheme in its current form, are there opportunities to improve the administrative efficiency of the scheme?:

No comment.

43 Do you have any views on the effectiveness of KTIF and how the aims of the scheme could be promoted in the future?

Do you have any views on the effectiveness of KTIF and how the aims of the scheme could be promoted in the future?:

Whilst we recognise that the historic environment is one of many competing issues under consideration, we would be happy to discuss the current process and the potential for opportunities with you to ensure that training considers environmental issues in the round. There could be scope here to emphasise the link between Model Farms and environmental good practice, including the good management of heritage assets on agricultural land. We would be happy to work in partnership with you and other relevant agencies to develop such a model.

44 Would you support a similar type of scheme going forward?

Would you support a similar type of scheme going forward?:

No comment.

45 Would you support a future approach that aims to deliver similar increases in efficiency through the direct payment support mechanisms?

Would you support a future approach that aims to deliver similar:

No comment.

46 Do you see a continuing role for the Scottish Rural Network (SRN) and, if so, do you agree that its current aims and objectives should be maintained during the transition period?

Do you see a continuing role for the SRN and, if so, do you agree that its current aims and objectives should be maintained during the transition period? :

No comment.

About you

What is your name?

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Are you responding as an individual or an organisation?

Organisation

What is your organisation?

Organisation:

Historic Environment Scotland

The Scottish Government would like your permission to publish your consultation response. Please indicate your publishing preference:

Publish response with name

We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise?

Yes

Evaluation

Please help us improve our consultations by answering the questions below. (Responses to the evaluation will not be published.)

Matrix 1 - How satisfied were you with this consultation?:

Slightly satisfied

Please enter comments here.:

Matrix 1 - How would you rate your satisfaction with using this platform (Citizen Space) to respond to this consultation?:

Slightly satisfied

Please enter comments here.: