



Consultation response

Brexit and our land: Securing the future of Welsh Farming

Date: October 2018

Description: This consultation from Welsh Government sought views on the government's proposals for future agricultural policy in Wales.

About us

Historic Houses represents the UK's largest collection of independently owned historic houses, castles and gardens. Our family includes over 1,650 historic houses, many of which look after significant parts of the rural landscape, including important rural heritage assets.

There are over 100 Historic Houses places in Wales, which between them welcome over 122,589 visitors annually and generate a visitor spend of £861,089 for the Welsh economy. Many of these houses are vitally important tourist attractions, small businesses and employers in what are often fragile local economies in rural parts of Wales.

Introduction

The country houses and gardens Historic Houses represents are deeply embedded in rural communities across Wales as local heritage landmarks. They are often also tourist attractions, small businesses, employers and clients, providers of community space and leisure activities and, of course, land managers and stewards of rural heritage.

The current Common Agricultural Policy (CAP) Pillar 2 recognises that rural prosperity encompasses a broad range of areas affecting the diverse communities that live and work in the rural landscape, as well as those that visit and enjoy the countryside. These rural landscapes are very special palimpsests of both the natural and the historic environment – reflected in funding streams such as Countryside Stewardship and LEADER. Historic Houses supports a future policy in Wales that recognises this parity by supporting farming and land management approaches that encompass the constructive conservation, sustainable use and enjoyment of both the historic and the natural environment, as part of a holistic rural landscape.

We fully support the aims of Welsh Government to create a new funding structure based on the principle of ensuring that public money is spent on public goods – including rural heritage. We are glad that this consultation recognises the important role of the historic environment in Wales, not only for the prosperity of Wales as drivers

of rural businesses including tourism, but also the importance of heritage and culture as part of Welsh identity, and the public good that heritage can create for communities at a local and national level.

We also welcome the emphasis the consultation places on economic resilience. It is vital that any future schemes fund projects that are economically viable.

That said, Historic Houses has some concerns arising from the consultation. While these concerns will be outlined in more detail in our responses to the consultation questions below, they can be summarised as:

1/Ensuring parity of the Historic Environment and the Natural Environment: the importance of funding the historic environment is recognised, but there is still a lack of full appreciation of the symbiotic relationship between the historic environment and the natural environment. The lack of parity between the two is further highlighted by the omission of any historic environment body as an advisor on the spatial targeting system, as mentioned in chapter 6.

2/ Proper detail on the future funding structures: It is difficult to comment on funding structures without a clear idea of the money available, and how those funds might be prioritised. Historic Houses appreciates that some of this detail is out of the control of Welsh Government, but it is disappointing that this consultation does not fully explain how the Economic Resilience scheme and the Public Goods scheme will work with each other, and how they will work alongside the future UK Shared Prosperity Fund.

Consultation questions

1. We propose a new land management programme consisting of an Economic Resilience scheme and a Public Goods scheme. Do you agree that these schemes are the best way to deliver against the principles? If not, what alternatives would be best?

Historic Houses supports the introduction of the Public Goods scheme. We are delighted that the consultation recognises that activities can deliver coordinated economic, environmental and social outcomes, and that management of heritage should be a key part of this scheme. We have some concerns about the level of detail offered about the new support schemes though; while the consultation makes reference to the importance of culture, heritage and tourism to rural communities, there is very little detail about how these public good will be rewarded. It would be good to make this support more explicit in future interactions, so that land managers are fully aware of the support that they can receive for positive management of cultural heritage. Historic Houses is also concerned about the level of bureaucracy that might be involved in the new schemes. It is suggested in chapter 4 that there could be an additional fund to replace the current LEADER funding. While having a specific fund for rural development is in many ways a positive step, having three separate funding streams which land managers can apply for could lead to confusion, and risks wasting time writing three separate applications. Perhaps land managers could apply through

one portal, with the option of applying to one of the three schemes, to both or to all three, to obviate the need for multiple applications? There is also no mention of how a future UK Shared Prosperity Fund will work with these funding streams. Historic Houses understands that some of this decision making may be out of the hands of Welsh Government, but it is important to know that these factors are being considered even at these early stages.

5. Are the five proposed areas of support the right ones to improve economic resilience? Are there any areas which should be included but currently are not?

Historic houses is pleased to see that diversification is listed as one of the proposed areas for support, and we are especially pleased that one of the potential initiatives mentioned is broadband connectivity for businesses. A good, reliable broadband connection of at least 20Mbps download and 2Mbps upload speed is essential for rural businesses, allowing them not only to run a website with high-quality media content and social media accounts, but also to become part of their future offer to customers; for example, un-used farm buildings could be converted into office units, which in turn would benefit from reliable broadband.

Historic Houses is also reassured to read that advice on diversification will be offered to rural businesses, so that they are fully aware of all the options for diversification. We hope that future detail about this advice will make it clear that it will not only relate to farming diversification, but also to opportunities for rural tourism and commercial opportunities for supporting cultural heritage - including businesses lets, events, venue hire and filming.

8. We have set out our proposed parameters for the public goods scheme. Are they appropriate? Would you change anything? If so, what?

Historic Houses is pleased to see that management of heritage is mentioned in the opening paragraph of chapter 6, and then listed as one of the public goods which will be within scope of the initial scheme. It is reassuring to see the hugely significant value of heritage recognised in this consultation. However, we believe that there is greater scope for heritage to have a positive impact on Welsh rural communities beyond walking and physical activities. The success of rural heritage assets can generate a wide range of economic, social and cultural benefits for communities – such as increased job opportunities (either directly or indirectly through local procurement, as well as through increased secondary spend in local communities), access to culture and the arts, and health and wellbeing benefits. While some Historic Houses places have used LEADER funding to develop their visitor facilities, many others have used it to develop otherwise redundant buildings into workshops and offices for SMEs, and to develop venues for hire – providing a source of employment in fragile rural economies Heritage can deliver so much more than just opportunities for tourism, and it is important that any future funding for rural heritage is not limited only to tourism projects and outdoor recreation.

Historic Houses also has some concerns about parameter 2, and the level of public access that will be required as part of those projects that are funded by the public

goods scheme. What is meant by public access deserves very careful thought and a clear definition. Any new elements of public access in the new policy should be based on voluntary, flexible arrangements with landowners, and should take into account any potential risks and costs to landowners. While public access is a vitally important part of many projects, it is important to remember that many very worthy conservation projects can provide public access in a different or less obvious way i.e. through restoring a heritage asset as a wedding venue, an office or a business space. These projects are just as important as a means of conserving important parts of the rural heritage landscape, and indeed these sorts of projects are sometimes the only economically viable option for some heritage assets.

12. A collaborative approach to delivering public goods may in some instances provide better value for money than isolated activity. How could the scheme facilitate this approach? How could public and private bodies contribute to such partnerships?

Historic Houses is pleased to see that Welsh Government recognises the importance of collaborative working between the public and private sectors, and the contribution that private investment can make in the delivery of public goods. The majority of Wales's heritage is cared for and maintained by independent private owners, and they are key stakeholders in the delivery of any future programmes. While we do not have specific suggestions for how such a scheme could work, we would strongly suggest that for collaborative work to be successful various organisations – such as Historic Houses, the National Trust, the NFU, the Wales Tourism Alliance, the National Park Authorities and Natural Resources Wales – should all be involved in working with the Welsh Government to feed in to the design of any future programmes.

13. Some actions can deliver multiple public good in the same locations. For example, peat bog restoration can have benefits for carbon sequestration and flood risk reduction. However, some locations could be suitable for multiple public goods from different activities. For example, one location may be suitable to either plant trees for carbon sequestration, or to revert to wetland for biodiversity. How could locations for single, multiple or competing benefits be prioritised?

Historic Houses does not have an overall comment on this but we have some concerns about how exactly the spatial targeting system mentioned in 6.18 has been designed, and what part it will play in delivering the new public good scheme. We are surprised that this consultation specifies it will be used to decide on which public good opportunities exist in particular locations. Our concerns are exacerbated as there is no mention of how decisions by Natural Resources Wales can be challenged, and finally by the fact that the only governing body for this system is NRS. Given that Welsh Government has identified that not all public goods are themselves natural resources, it seems odd that the decision-making organisation behind this system is one with limited experience of heritage and the opportunities that the built environment offers for public goods. We would seek further clarity from Welsh Government on the intention behind the potential system outlined in 6.18 and call for Welsh Government to consider how heritage expertise can be included around the table in decision-

making. One solution could be for a formalised link between the CADW board and the Historic Environment Group.

14. Given that support for the delivery of public goods will be a new approach in Wales, there will be a requirement for a significant amount of training and advice for the sector. How best could this training and advice be delivered? Which areas of the sector need the most attention?

Whatever the approach taken to training, it is important to remember that many people in rural communities do not have access to good mobile signal or reliable broadband, and so direct outreach work should be offered as well as disseminating information through membership organisations where appropriate. Historic Houses looks forward to being included in this process.

15. Private investment in the purchase of public goods is already happening, but at a relatively small scale. How could the new scheme promote greater involvement from the private sector? What are the barriers to this type of investment?

Historic Houses does not have specific recommendations for a new private sector investment scheme. However, if private sector investment in public goods is to take place, again, detailed clarity is needed as to what actually constitutes a 'public good' and an indication as to the degree of flexibility that will be allowable to enable complex working relationships that can make a project viable - socially, economically and culturally. Heritage conservation requires the involvement of multiple stakeholders across the public, private and non-government sectors in order to be able to mobilise the required resources needed, particularly where specific and/or urgent challenges require a multidisciplinary approach. The majority of heritage is looked after by private owners, and public-private collaboration in heritage conservation is an important part of the heritage landscape. It is difficult to predict barriers at this stage to the role and use of public-private partnerships in achieving conservation outcomes.

16. What are your comments on the phased transition period and our ambition to complete the changes by 2025?

17. What is the most appropriate way to phase out the Basic Payment Scheme to start implementation of the new schemes?

While we don't have specific comments on the transition period or the most appropriate way to phase out the Basic Payment Scheme, Historic Houses wants to reinforce the importance of early and clear communication with all stakeholders, so that they are aware of the scheme changes at an early stage and are not left out of pocket. We would also add that given there is some possibility for change in the transition period for England (as led by Westminster), this should be borne in mind when deciding on the final timetable.

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