



CONSULTATION RESPONSE

Historic Environment Scotland's comments on
proposals for a new agriculture bill

5 December 2022

Response ID ANON-XEE5-9THW-3

Submitted to Delivering our Vision for Scottish Agriculture. Proposals for a new Agriculture Bill
Submitted on 2022-12-05 11:39:39

1. Future Payment Framework

1 Do you agree with the proposal set out above, in relation to the Agriculture Bill including a mechanism to enable payments to be made under a 4 tiered approach?

Yes

Please give reasons:

We broadly agree with the proposal set out in the consultation paper, although we believe that it will be essential to include the historic environment as a priority for support. The historic environment is important in its own right and it also delivers ecosystem service benefits such as supporting soil health, carbon retention, habitats and biodiversity, and provides the character that defines local landscapes and identities.

The Scottish landscape is the product of the interaction of people and the natural environment for 9000 years. Many of Scotland's nationally important designated historic assets are in rural areas: three World Heritage Sites, most of Scotland's 8200 scheduled monuments, many listed buildings, and sites on the Inventories of Gardens and Designed Landscapes, and Historic Battlefields as well as over 300,000 known undesignated historic assets. These include upstanding ruins, earthworks and traditional buildings as well as the field systems, plantations and other patterns produced by past land management. There are sites and monuments in lochs and reservoirs and environmental remains on soils and peat bogs. This is a finite resource that once lost, is gone forever.

The historic environment is important its own right. It also has strong links with our natural environment which itself is largely a product of past human activity and land management practices. It is an important carbon sink, which can be enhanced to increase carbon sequestration. Positive management of historic features can deliver significant climate and biodiversity benefits as well as benefitting people. Farmers and land managers already care for nationally important scheduled monuments and many other archaeological and historic features. In doing this they deliver an important public benefit and they need to be supported. Support for the protection and management of historic buildings, sites and monuments can also help provide particular support for small farmers and crofters.

People value the historic environment and a well-maintained environment, both natural and cultural, contributes to well-being and quality of life. 93% of adults agree that "when trying to improve local places it is worth saving their historic features".

The historic environment contributes to people's quality of life and is valued by communities. Scotland's access legislation and the detailed site information available on the HES Canmore and Pastmap websites and in Local Authority Historic Environment Records helps the public to visit and learn about historic sites and increase their appreciation and understanding of our past.

Our historic environment is vulnerable and needs to be recognised and cared for if it is not to be lost. It is important and people value and benefit from it. It delivers multiple public benefits and can provide an important opportunity for farmers and crofters in achieving a Just Transition. It must be included in any new system of agricultural support.

2 Do you agree that Tier 1 should be a 'Base Level Direct Payment' to support farmers and crofters engaged in food production and land management?

Yes

Please give reasons:

We broadly agree with what is set out in the consultation paper. However, the historic environment should be included as one of the issues against which farmers, crofters and land managers should be required to demonstrate appropriate activity. As a minimum this could be as a flat payment for scheduled monuments and category A listed agricultural buildings. This would provide some support for the protection of these nationally important assets, which bring with them a requirement to management in line with legal requirements.

However, a modern system of agricultural support should:

- Incentivise farmers, crofters and land managers to identify heritage features – designated and undesignated - on their agricultural holdings and incorporate them as part of the Whole Farm Plan making process.
- Provide support through training, access to data and continuing professional development to ensure that positive management of these assets are identified as part of the plan-making process.
- Prioritise funding of proposals which have compounded benefits for the natural and historic environment. Funding such proposals would involve both capital items and ongoing management payments.

We have provided further comments on the role of the Whole Farm Plan in this process in response to question f below.

We note from figure 3 that work on sustainable farming standards, which would provide some conditionality to Tier 1 payments is still to be done. We would be very happy to provide you with some information and advice on how the historic environment could be incorporated into Greening measures, cross-compliance requirements and the Whole Farm Plan-making process.

In terms of cross-compliance, it will be important to put procedures in place to ensure that scheduled monuments are at best not directly eroded by funded works which could leave farmers, crofters and land managers open to prosecution under the Ancient Monuments and Archaeological Areas Act 1979. However, a new system of payments would also ensure that scheduled monuments are maintained in a good state.

Any scheme should include provisions for data and monitoring. It will be important to demonstrate map-based boundaries and a scored condition monitoring system to help integrate scheduled monuments into the planning process and monitor the results and success of any scheme.

3 Do you agree that Tier 2 should be an 'Enhanced Level Direct Payment' to deliver outcomes relating to efficiencies, reducing greenhouse gas emissions and nature restoration and enhancement?

Yes

Please give reasons:

Land managers whose land includes scheduled monuments, listed buildings and gardens and designed landscapes and battlefields are constrained in how they can manage these historic environment features. They have duties to consider their protection and may be required to use specific techniques to repair them or get legal permissions to do specific types of work on them.

There should be recognition of these factors in a fixed payment at this level of the scheme for land managers whose land includes designated historic environment assets, particularly scheduled monuments or A listed buildings.

4 Do you agree that Tier 3 should be an Elective Payment to focus on targeted measures for nature restoration, innovation support and supply chain support?

Yes

Please give reasons:

At this level of funding, consideration should be given on the basis of the Whole Farm Plan, to prioritising funding of proposals which have compounded benefits for the natural and historic environment. Funding such proposals would involve both capital items and ongoing management payments.

We would particularly welcome proposals addressing:

- Removal of scheduled monuments from ploughing and establishment of permanent grassland. Managed grazing is the optimum management regime for most archaeological monuments. This measure would protect the monuments and provide important and increasing carbon sequestration and biodiversity benefits long into the future as the grassland becomes more organically rich and species-diverse over time.
- Control of soil erosion over identified historic environment assets. This could be by establishment of new minimum-till or no-till cultivation, by control of burrowing animals following established guidance, retention of winter stubbles, management of grazing, erection of fencing to control access, or any other appropriate and accepted measure. By reducing progressive soil loss, carbon would be preserved and the historic environment assets protected, and this would address the uncontrolled risk identified in Climate Ready Scotland.
- Repair and reuse of traditional and historic buildings. This would protect the visual appearance of the landscape, preserve the structures that were created with such care and effort, and prevent the use of resources for demolition and new construction.
- Repair and retention of traditional and historic routeways, field boundaries and landscape features.

Sustainable management of the rural environment is a key component of the current agriculture support system and is mutually beneficial to both the historic and natural environment. But both aspects need to be understood and considered in order to avoid approaches that might result in deterioration of the other. We can provide information on request to emphasise that care for the soil and sward provide compounded benefits.

Carefully considered schemes will frequently result in mutual benefits for biodiversity, habitats and ecosystems. Reducing mechanical disturbance can protect carbon, enhance soils, protect water quality, and increase the diversity of plant and animal species. However, some biodiversity schemes will need to be carefully considered to ensure both sets of benefits align and that one priority does not place the other at risk. Some practices, including rewilding, may not be suitable for land with important historic assets.

Any scheme should also actively encourage public engagement, by facilitating access and providing interpretation. This has been one of the most successful outcomes of the current AECS and should be continued.

5 Do you agree that Tier 4 should be complementary support as the proposal outlines above?

Yes

If so what sort of Complementary Support do you think would be best to deliver the Vision? Please give reasons:

Training and CPD for farmers, land managers and crofters will be an essential part of Tier 4 funding. We would welcome the inclusion of the historic environment in any complementary support funding. Resources should be made available to provide training and continuing professional development to farmers, crofters and land managers to enable them to understand the historic environment, its benefits and to identify ways of managing this important, finite resource in a positive way so that it can be protected and so that it can deliver wider benefits to the environment and people now and in the future.

Access to relevant advice should also be part of Tier 4 funding, including from Local Authority historic environment services.

A key challenge is a critical shortage of skills for the maintenance and repair of traditional buildings and landscape features. The proposal for vocational training, skills development and knowledge transfer projects focused on agriculture and crofting have the potential to assist with this shortage. Maintaining these small-scale but essential land management practices could also be mainstreamed into the proposed Agricultural Support Package.

6 Do you agree that a 'Whole Farm Plan' should be used as eligibility criteria for the 'Base Level Direct Payment' in addition to Cross Compliance Regulations and Greening measures?

Not Answered

Please give reasons:

The Whole Farm Plan should include an assessment of the historic environment on the farm. This should include both designated and undesignated heritage assets. This would allow the land manager to understand what features they have within their land holding and to identify any legal obligations they may have to protect specific historic environment features. It would help them to identify opportunities to provide positive management for the historic environment. This would also ensure that there was sufficient information to avoid accidental damage to the historic environment as a result of proposals targeting other priorities.

7 Do you agree that the new Agriculture Bill should include a mechanism to help ensure a Just Transition?

Yes

Please give reasons:

Recognition of the historic environment in the new Agriculture Bill would provide a key mechanism for ensuring a Just Transition. As noted above, the historic environment is one of Scotland's key assets which brings wider environmental and public benefits. The traditional skills and materials required to maintain it is a source of good, green jobs. The historic environment is a key aspect of our local and national identity and provides a strong sense of place in our rural areas.

8 Do you agree that the new Agriculture Bill should include mechanisms to enable the payment framework to be adaptable and flexible over time depending on emerging best practice, improvements in technology and scientific evidence on climate impacts?

Not Answered

Please give reasons:

9 Do you agree that the new Agriculture Bill should include mechanisms to enable payments to support the agricultural industry when there are exceptional or unforeseen conditions or a major crises affecting agricultural production or distribution?

Not Answered

Please give reasons:

2. Delivery of Key Outcomes: Climate Change Adaptation and Mitigation

1 Do you agree with the proposal set out above, in relation to the new Agriculture Bill including measures to allow future payments to support climate change mitigation objectives?

Yes

Do you have any views on specific powers and/or mechanisms that could support such alignment? Please give reasons:

Recognising the important role the historic environment plays in climate change mitigation would be one mechanism that would support alignment with climate mitigation objectives.

Soils act as important carbon reservoirs, and their ability to sequester carbon can be rapidly and greatly increased by reducing tillage, preventing erosion, and establishing long-term (ideally permanent) grassland. Buried archaeological deposits are significant carbon storage sinks, and they make up dense, complex soils with diverse soil microbes, creating specific ecosystems which are important habitats. Archaeological sites managed to reduce mechanical intervention lead to better soil health. The ongoing use, repair or reuse of traditional buildings and structures can prevent the release of carbon from demolition and/or new construction.

Positive management actions such as reducing mechanical disturbance, encouraging sensitive repair and the reuse of buildings, and increasing carbon capture through landscape scale management opportunities that work with the historic environment, will deliver multiple benefits.

2 Do you agree with the proposal set out above, in relation to the new Agriculture Bill including measures to allow future payments to support climate change adaptation objectives?

Yes

Do you have any views on specific powers and/or mechanisms that could support such alignment? please give reasons:

We broadly agree with the proposal included in the consultation paper in relation to adaptation. The historic environment can support alignment with climate change adaptation objectives. It provides important ecosystems services which provide benefits to people and nature and make an important contribution of climate change adaptation. It will be important to take a holistic approach to decision-making on climate mitigation and adaptation measures that recognises the role of the historic environment as both an important resource in its own right and also as a source of multiple benefits to people and the environment.

Positive management actions for the historic environment are also beneficial for nature. This includes reducing tillage, cover cropping and the addition of organic matter to avoid degradation and erosion.

The positive management measures described above also contribute to improving water quality, natural flood management and drought resistance.

3 Do you agree with the proposal set out above, in relation to the new Agriculture Bill including a mechanism to enable payments to be made that are conditional on outcomes that support climate mitigation and adaptation measures, along with targeted elective payments?

Yes

Please give reasons:

We agree with this provided that positive management of the historic environment is explicitly identified as one of the outcomes that supports climate mitigation and adaptation measures for the reasons identified in response to questions 1 and 2 above

4 Do you agree with the proposal set out above, in relation to the new Agriculture Bill including measures that support integrated land management, such as peatland and woodland outcomes on farms and crofts, in recognition of the environmental, economic and social benefits that it can bring?

Yes

Please give reasons:

We agree that the new Agriculture Bill should include measures that support integrated land management. However, the new bill must also recognise that the historic environment and positive management of this resource is also a relevant factor. The historic environment is important in its own right. It also delivers wider environmental, economic and social benefits that farmers, crofters and land managers should be supported to deliver through good stewardship.

2.1 Nature Protection and Restoration

1 Do you believe the new Agriculture Bill should include a mechanism to protect and restore biodiversity, support clean and healthy air, water and soils, contribute to reducing flood risk locally and downstream and create thriving, resilient nature?

Yes

Please give reasons:

Our current environment is the product of millennia of human interaction, and many aspects of soils, carbon status and biodiversity are directly related to the presence of historic environment assets. The historic environment provides a wide range of ecosystem services as well as creating and significantly contributing to the quality and distinctiveness of our places. It provides benefits to people through access, health and well-being. The new Agriculture Bill should recognise the role of the historic environment in delivering these services.

2 Do you believe the new Agriculture Bill should include a mechanism to enable payments that are conditional on outcomes that support nature maintenance and restoration, along with targeted elective payments?

Yes

Please give reasons:

The new Agriculture Bill should also include a mechanism to enable such payments that support the maintenance and good stewardship of the historic environment.

Scotland's rural landscapes and environments are almost entirely a product of millennia of human interaction. Past land management has developed our soils and archaeological deposits act as a reservoir for carbon and nutrient capture as well as preserving evidence of our past communities.

The historic clearance of forests led to the formation of habitable and farmable places, and also had unintended consequences. These include widescale peat growth and subsequent land management practices, such as waterway creation and manipulation. Food production has historically involved drainage, creation of fields, grazing regimes and woodland planting. All of these actions have formed our present physical surroundings and ecosystems.

Historic sites can be special for biodiversity. Many have been protected from development, particularly agricultural improvement, which has allowed the preservation of local habitats and species. Historic sites can therefore be reservoirs of wildlife which can support conservation initiatives, with important local populations of plants and animals. Larger sites and linear features, such as the Antonine Wall, are important contributors to the wildlife corridors

which allow plants and animals to migrate and spread as a result of pressure from development and climate change.

Materials used for repair and retrofit of traditional buildings are generally natural, locally sourced (vernacular) with low embodied carbon. The requirement of these materials can stimulate the development of new low carbon material manufacturing industries and supply chains in Scotland. For example, HES have been providing modest financial support to the Royal Society for the Protection of Birds (RSPB) to help fund the production of thatching reed on the Tay estuary. Controlled cutting of the reed for thatch is helping to produce a more diverse tapestry of habitats to support a wider range of species.

3 Do you believe the new Agriculture Bill should include a mechanism to enable landscape/catchment scale payments to support nature maintenance and restoration?

Yes

Please give reasons:

We agree with these proposals provided that the historic environment is recognised as a relevant factor. Historic Environment Scotland and NatureScot's joint position statement People, Place and Landscape sets out our joint vision for the management of our landscapes. It recognises that the natural and cultural aspects of landscape are inextricably linked.

Actions at landscape scale should be holistic and recognise the contribution made by both cultural and natural heritage at this scale. A good example of this is a project which HES will be scoping over the next two years about the machair. This is a rare habitat type in the Western Isles which is both cultural and natural. Buried archaeology here helps anchor the machair which in turn provides important habitats and a potential source of building materials for the repair and retrofit of traditional buildings. It relies on traditional low-intensity farming (crofting). Research commissioned in 2021 by HES has identified a potential opportunity to support this rare ecosystem through the small-scale production of thatching straw in the Western Isles.

As noted above, the historic environment provides a wide range of mutual benefits to nature and people and this should be supported in the new Agriculture Bill.

2.3 Wider Rural Development

1 Do you agree that the proposals outlined above should be included in the new Agriculture Bill?

Yes

Please give reasons:

The new Agriculture Bill should include the historic environment. As noted above, our rural areas and Scotland's islands are rich in cultural heritage. Farmers, crofters and land managers already play a key role in its stewardship and the new legislation provides an opportunity to incentivise them to manage these assets positively so that our landscapes and heritage can be understood, appreciated and experienced now and in the future. Heritage is a key component in rural land management and may provide a catalyst to support economic activity. The definition should be broadened to a whole land approach and not just agriculture to support this.

2 Are there other areas relating to non-agricultural land management such as forestry that you would like considered for support under the Agriculture Bill to help deliver integrated land management and the products produced from it?

Yes

Please give reasons:

The historic environment. As noted earlier, many of Scotland's heritage assets are located in rural areas, including our islands. The historic environment is a source of good, green jobs as traditional skills and materials are used in the management and maintenance of our rural buildings and landscape features. Heritage assets can be the focus for rural regeneration and tourism projects. The conservation of both tangible and intangible heritage assets should be included as part of eligibility criteria for support. Traditional skills and traditions in land management may be under threat and need support.

3 What other powers may be required to enable rural development in Scotland's rural and island communities?

Not Answered

Please give reasons:

4 What potential social, economic or other impacts, either positive or negative, would such powers have on Scotland's rural and island communities?

Please give reasons:

3. Skills, Knowledge Transfer and Innovation

1 Do you agree that support should continue to be provided in this area?

Yes

Please give reasons:

Support should be provided for training on the historic environment, as discussed in response to Tier 4 proposals. Awareness of the presence and condition of historic environment assets is key to enabling land managers to make good decisions which will help to achieve multiple benefits from our land. It is also essential for advisors and regulating officers to be aware of these in order to help land managers in their positive stewardship.

2 Is there any particular gaps in delivery that you can identify?

Yes

Please give reasons:

We consider that this is of vital importance and will be critical to achieving adequate care of the historic environment. Farmers and agricultural consultants/advisors must:

- Know how to access information about historic environment features on the holding
- Understand the nature of the historic environment features
- Understand what positive measures may benefit the historic environment
- Understand the implications of other management options for the historic environment
- Understand where works or management options they are considering may require a statutory consent from Historic Environment Scotland.

3 Are there any alternative approaches that might deliver better results?

Don't know

Please give reasons:

4 Do you have any ideas as to how engagement/participation in advisory services, knowledge transfer or skills development might be improved?

Don't know

Please give reasons:

5 Do you agree that Scottish Ministers should have the power to establish a national reserve and regional reserve if/when required to ensure the equal treatment of farmers and to avoid distortions of the market and of the competition?

Not Answered

Please give reasons for your answer:

4. Administration, Control, and Transparency of Payment Framework Data

1 Do you agree that Scottish Ministers should have the power to create a system that provides for an integrated database, to collect information in relation to applications, declarations and commitments made by beneficiaries of rural support?

Not Answered

Please give reasons:

2 Do you agree that Scottish Ministers should have the power to create a system that collects and shares information for the purposes of carrying out management, control, audit and monitoring and evaluation obligations and for statistical purposes, subject to General Data Protection Regulation (GDPR) requirements?

Not Answered

Please give reasons:

3 Do you agree that Scottish Ministers should have the power to share information where there is a public interest in doing so, and subject to complying with the General Data Protection Regulation GDPR?

Not Answered

Please give reasons:

4 Do you agree that Scottish Ministers should have the power to create a system that provides a mechanism that aligns with the principles of the Scottish Public Finance Manual?

Not Answered

Please give reasons:

5 Do you agree that Scottish Ministers should have the power to create a system that provides the data required to undertake administrative checks on applications / claims made by beneficiaries for rural support?

Not Answered

Please give reasons:

6 Do you agree that Scottish Ministers should have the power to create a system whereby on-the-spot-checks should be undertaken to further verify applications / claims made by beneficiaries for rural support?

Not Answered

Please give reasons:

7 Do you agree that Scottish Ministers should have the power to create a system that would provide for cross compliance, conditionality that covers core standards in relation to sustainable environment, climate, Good Agricultural and Environmental Condition (GAEC), land, public and animal health, plant health and animal welfare, Soil health, carbon capture and maintenance?

Yes

Please give reasons:

The location and extent of all designated historic assets is available online and is easily accessible, both as individual records and as GIS map-based data. It is crucial that all land managers and farm advisors regularly consult with this record so that they are aware of designated assets on the land they own and/or manage. Historic Environment Scotland can provide advice on the need for consents for any work proposed and use our Scheduled Monument Condition data to provide advice on management and monitor its impact.

Our scheduled monument data can support a new system as they are marked in full extent. HES also monitors and has a scoring system for assessing the condition and risk of schedule monuments that could help demonstrate the success or otherwise of the scheme. We also have staff who can advise on a case-by-case basis. It will be essential to work together to design a new scheme to ensure that damage does not occur which would not only threaten and damage these nationally important assets, but also open land managers open to prosecution through works funded through the scheme. Cross compliance is important and currently managed through the GAEC, so needs to be retained, if not enhanced.

Historic Environment Scotland and local authorities also maintain online data on the location of all known archaeological sites. Most local authority archaeology services maintain online records of the extent of undesignated archaeological sites within their Historic Environment Records. Some of this information is available on the PastMap website. Consulting this data is helpful for land managers in making good decisions and may be important in helping them meet their responsibilities to retain landscape features under GAEC 7.

Historic Environment Scotland also hold Historic Land-Use Assessment data which may also be of assistance. This is available online and as downloadable GIS layers. This data shows the extent of many historic environment landscape features, which can be used to demonstrate the historic nature of many of today's landscape features and understand the depth, origin and presence of many natural environment features, such as woodland, hedges, field boundaries, watercourses, deep and complex soils, rich habitats and biodiversity.

8 Do you agree that Scottish Ministers should have the power to create a system that provides a mechanism to support the delivery of practices aligned to receipt of elective payments, for targeted outcomes?

Not Answered

Please give reasons:

9 Do you believe that Scottish Ministers should have the power to monitor and evaluate outcomes to ensure they meet the agreed purpose and help better inform future policy?

Not Answered

Please give reasons:

10 Do you believe that Scottish Ministers should have the power to seek independent assurance that outcomes are delivered appropriately?

Not Answered

Please give reasons:

11 Do you agree that Scottish Ministers should have the power to enable the publication of details pertaining to recipients who receive payments including under the future payment model (outlined above) and set a level above which payment details will be published?

Not Answered

Please give reasons:

12 Do you agree that technical fixes should be made to the Agriculture and Retained EU Law and Data (Scotland) Act 2020 to ensure Scottish Ministers have all requisite powers to allow CAP legacy schemes and retained EU law to continue to operate and be monitored and regulated and also to ensure Scottish Ministers have flexibility to better respond to current, post exit, circumstances?

Not Answered

Please give reasons:

Assessing the Impact

1 Are you aware of any potential costs and burdens that you think may arise as a result of the proposals within this consultation?

Please give reasons:

2 Are you aware of any examples of potential impacts, either positive or negative, that you consider that any of the proposals in this consultation may have on the environment?

Please give reasons:

As they stand the proposals would have a negative impact on the environment because the historic environment – a key environmental asset – has been excluded. We know that the current system which provides support for only a small minority of heritage assets leaves this resource vulnerable to loss and damage. The proposals would not accord with the policies and principles set out in the Historic Environment Policy for Scotland.

In response to the SEA screening consultation for the Bill we highlighted that the proposals, as they stand, are likely to have negative effects on the historic environment compared to current arrangements, and that opportunities to create, and benefit from, positive effects on the historic environment have not been taken. We also noted that the detail of the proposals also suggests that the Bill itself could constrain lower-level actions and legislation.

In view of this, we recommend that the screening decision for the Bill is kept under continual review as the drafting process continues. If any components of the Bill itself are likely to constrain or set a framework for interaction with historic environment objectives at a lower level, you should consider assessment of those components at Bill level.

Historic Environment Scotland has baseline condition and risk data for nationally important scheduled monuments.

We maintain a cycle of regular scheduled monument monitoring, recording their condition and risk, patterns of change, wider threats, etc. We have a database showing the condition of almost all 8000 scheduled monuments. We have current (last 5 years) data for about 50% of these monuments, with the ability to update our records via targeted condition monitoring of specific sites where this is required.

We can therefore demonstrate the impact of funding decisions and different management options, putting in place visits to score monuments after management has occurred. Little action is needed by agricultural businesses as we usually have a record of baseline data against which we can measure change. However, when required, land managers can request a visit from our field officers, who can then confirm up to date baseline condition, discuss management options, and then return in subsequent years to measure impact.

The condition monitoring data for scheduled monuments is collated nationally. It helps to show the impact of management changes on individual monuments: this condition and risk scoring is provided to owners and land managers and shows them the impact of any changes. We do not consider it appropriate to publish these scores for individual monuments or farms. However, Historic Environment Scotland publishes regular reports on the condition of Scotland's scheduled monuments, showing changes in condition and risk by local authority and by monument category.

The last 5 yearly report was published in 2017 and can be accessed here:

<https://www.historicenvironment.scot/archives-and-research/publications/publication/?publicationid=110fca7c-eae7-490c-84d3-aa4200e2d2e4>

The headline was that around 88% of monuments visited are in a satisfactory condition. However, around 10% of monuments have major but localised problems, while 2% have extensive significant problems. Issues with ruined masonry buildings can be costly to address and therefore intractable. The majority of condition issues, though, could be addressed by relatively minor changes in the management regime, alongside cost-effective and targeted interventions.

Including the historic environment in the new Agriculture Bill would help to mitigate likely significant adverse effects. Providing support for farmers, crofters and land managers would be likely to have a beneficial effect on the environment because it would achieve the protection of this vulnerable resource. It would also deliver a range of wider ecosystem services which have been outlined elsewhere in this consultation response.

3 Are you aware of any examples of particular current or future impacts, positive or negative, on young people, of any aspect of the proposals in this consultation? Could any improvements be made?

Please give reasons :

4 Are you aware of any impacts, positive or negative, of the proposals in this consultation on data protection or privacy?

Please give reasons :

5 Are you aware of any examples of how the proposals in this consultation may impact, either positively or negatively, on those with protected characteristics (age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation)?

Please give reasons :

6 Are you aware of any examples of how the proposals in this consultation might have particular positive or negative impacts on groups or areas experiencing socioeconomic disadvantage? These could be households with low incomes or few resources; families struggling to make ends meet; people who experienced poverty while growing up; or areas with few resources or opportunities compared with others.

Please give reasons :

7 Are you aware of any examples of how the proposals in this consultation might impact, positively or negatively, on island communities in a way that is different from the impact on mainland areas?

Please give reasons :

About you

1 What is your name?

Name:

Adele Shaw

2 What is your email address?

Email:

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3 Are you responding as an individual or an organisation?

Organisation

4 What is your organisation?

Organisation:

Historic Environment Scotland

5 What is your occupation?

Public sector

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

Publish response with name

7 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

8 I confirm that I have read the privacy policy and consent to the data I provide being used as set out in the policy.

I consent