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THE DARTMOOR COMMONERS' COUNCIL'S RESPONSE TO DEFRA CONSULTATION ON FUTURE FOR FOOD, FARMING AND THE ENVIRONMENT; HEALTH AND HARMONY.

This response is submitted by the Dartmoor Commoners' Council (Council). The Dartmoor Commons Act 1985 enabled the creation of Council and imposed duties on Council including the management of the commons, welfare of livestock on the commons and the administration of a register of rights. The majority of 35,000 ha. of common land on Dartmoor is or has been in an agri-environment scheme agreement and the common land continues to be managed to deliver an impressive array of public benefits (see <http://www.dartmoorcommonerscouncil.org.uk>).

Council welcomes the opportunity to comment on the consultation. We have emphasised our response to those issues of particular relevance to our Members; food production, hill farming and common land.

Council will make the case that the uplands and associated hill farming are unique and therefore require specific policies and support, as does common land. The failure of previous policies to address common land at the outset has incurred significant (and costly) remedies later in the delivery of inappropriate regulation and policy instruments.

Council's response to specific questions:

Part 2: Reform within the CAP

The options which Council believes are the most important are:

- a) Develop further simplified packages, including one specific to common land.
- b) Simplify the application form and stop frequently changing the application form/process and options. This leads to real confusion and is a deterrent to those considering joining a scheme.
- c) Expand the online offer but this must come with an easier to understand website, and much better connectivity for the rural community.
- d) Reduce evidence requirements in the rest of the scheme. Work with the land managers to enable effective compliance by supportive advice, not as at present looking for failure.

Council believes it is possible to improve the delivery of the current Countryside Stewardship Scheme and increase uptake by farmers and land managers to help achieve valuable environmental outcomes. However the current scheme is not readily accessible to commons and would require a commons specific scheme if it is to protect and enhance the impressive array of public goods found on common land. In addition to a specific commons scheme, Council suggests:

- Enable and encourage farmers to decide on the most appropriate land management to deliver the agreed outcome.

- Listen to farmers, some have over 30 years' experience of AE schemes. Contact and empathy with the farming community is currently lacking in many situations. Provide a mechanism that enables the real decision makers to get out and listen to farmer discussion groups first hand. This has happened recently and it makes a difference, farmers feel they are being listened to.
- Reduce prescriptions whilst providing clear intention of the agreement.
- Maintain the certainty of an agreement to increase confidence in the scheme and process. Avoid constant changes, this has done much to undermine scheme take-up and delivery.
- The current Payment window of 6 months is no good to any business, set a payment timetable and do not change it during the life of the agreement.
- Provide a scheme suitable for common land that includes funding the additional activities required by collective agreements.
- There needs to a recognition of the complications involved with facilitating an environmental scheme that pulls together individuals that are not always like minded!
- Reduce the evidence required for the application process; most areas applying for CS will have been in previous agri-environment schemes so information is available to inform potential benefits to be secured by agreement.
- Trust us to deliver.

4: Successful Future for Farming

Hill farming delivers not only food but a landscape. This comes at a cost and is something that has never been paid for before; it has been the by-product of a vibrant and productive farming industry. Future support for hill farming must be sufficient to enable the farming to deliver not only food production but the environmental enhancement and maintenance required by so much of the natural capital. Now is the time to calculate the cost for the delivery of the public goods delivered by UK Agriculture PLC.

Food production is and will continue to be the main driver to future profitability. Whilst the choices for food production is limited in the uplands, the livestock farming in the hills has long been recognised as the nursery slopes for food (meat) production. The uplands play an essential role in the UK's livestock farming.

Farming excellence and profitability

4.1 Improving the take-up of knowledge and advice by farmers and land managers.

- a) Encouraging benchmarking and farmer-to-farmer learning although it is very difficult to obtain comparative figures for hill farms.
- b) Working with industry to improve standards and coordination.
- c) Provide better access to skills providers and resources.
- d) Developing formal incentives to encourage training and career development - an example is the British Agrochemicals Standards inspection Scheme (BASIS) and its relationship with CPD.
- e) Continuing Professional Development (CPD) a condition of any future grants or loans.
- f) The advice must be relevant to the farming system; advice on aspects of hill farming based on trials and sound science is almost non-existent. Opportunities for farmer led research; make it more accessible and create a research hub, where grassroots farmers input their research ideas/questions and the researchers can pick up the ideas and work with the farmers.

4.2 What are the main barriers to new capital investment?

Options selected are: a, b, and f.

- a) Insufficient access to good/useful support and advice.
- b) Uncertainty about the future and where to target new investment. Trade deals are of utmost importance for the stability of the whole rural economy and not knowing the trade deal is causing uncertainty. The farming cycles, especially those reliant on meat production, are slow to respond and farmers need to be better informed.
- f) 'Social' issues (such as lack of succession or security of tenure). Young people, new entrants and tenants have difficulty securing finance. Land bank could act as the guarantor. BPS currently linked to land, therefore many new entrants do not receive it.

4.3 What are the most effective ways to support new entrants?

New entrants often lack capital and they cannot access loans because of that lack of capital. They often start out by renting land on a short term basis, and therefore are unable to access direct payments (BPS). The young farmer payment would be more useful if it was not attached to the land, but went direct to the young farmer or new entrant.

4.4 Does existing tenancy law present barriers to new entrants, productivity and investment?

Council is aware that short term tenancies do not encourage capital investment including investing in new livestock. Securing the right breeding herd or flock takes time and tenancy agreements must be of sufficient length to provide the security necessary to make such changes. Tenancy agreements for new entrants should be of sufficient length to provide that security.

Agricultural technology and research

4.5 What are the priority research topics that industry and government should focus on?

Options selected are a, b and e.

- a) Plant and animal breeding and genetics
- b) Crop and livestock health and animal welfare
- e) Improving environmental performance, including soil health

We refer again to the value of developing a knowledge hub, (4.1). With only 1% of the £450 million research grant being farmer led, there needs to be a method of permitting farmers to feed into the research field. Farmers do have ideas, do want to see new initiatives, but there is no method of accessing direct to the research field. So the creation of a knowledge hub whereby farmers feed in their issues and researchers pick this up.

There is also a real need for experimental research farms that focus on the farming systems in the uplands.

4.7 What are the main barriers to adopting new technology and ideas on-farm?

The information is all too often inaccessible and not relevant to livestock farmers

Labour: a skilled workforce

4.8 What are the priority skills gaps across UK agriculture?

Options selected a, b and f.

Council would propose that the following issues are more relevant than the options provided.

- Lack of farmer engagement and the opportunities for farmer led initiatives that are informed by the relevant advice.
- Poor Interpretation of data and the application of scientific discovery; providing the results in a language understood by those necessary to deliver the findings and not just as scientific data.

- Too long a time scale between data research and on farm practical application.
- Keeping up to date with compliance is difficult. Need to have knowledgeable advice that is easy to access and work with before penalties are imposed.

4.9 What can industry do to help make agriculture and land management a great career choice?

The value of food production by UK Agriculture PLC must be understood and appreciated by all; from politicians to the general public. If food prices are to be kept lower than production costs then the public must understand this situation and appreciate the importance of supporting farming for food production and its associated public benefits.

4.10 How can government support industry to build the resilience of the agricultural sector to meet labour demand?

- Ensure profitability of the industry
- Cut the legislative burden and review the “gold plated” standards that are already adding considerable costs to farmers’ bottom line.
- Enable an access route for new entrants
- Look at tax incentives aimed at the non-land owning new entrant?

5. Public money for public goods

Council supports the proposal that the new agricultural policy is to be underpinned by payment of public money for the provision of public goods. Such an approach is particularly relevant to the uplands where the public benefits are more apparent. However Council would stress that the level of payment must be relevant to the level of delivery and sufficient to sustain the hill farms that are the mechanism for delivery. Council would also stress that payment for maintaining features and previous efforts is equally justifiable as that for new or enhancement. To rely only on rewarding additionality will fail to sustain the primary delivery process - farming.

The delivery of public goods has mostly been the by-product of food production. There is now the opportunity to better understand this relationship but the support payment rates and the processes for rewarding delivery must be well thought through; these services have been considerably undervalued in the past.

5.1 Which of the environmental outcomes listed below do you consider to be the most important public goods that government should support?

Council believes that this question is fundamentally flawed. The priorities for support will vary between areas. The process must include the opportunity to select the most pressing issue for a particular site. All the issues are important and it is perverse to try to rank to imply some are more important than the others.

That said, guidance must be provided to farmers to help them address the most pressing issues to their locality. This might include guidance relating to internationally important wildlife, internationally important archaeology and locally important public access. Rarely does the correct land management of one asset conflict with the management of another, many are mutually advantageous but this requires good communication and clarity of purpose.

A menu approach with all relevant assets (issues) included may be useful but would require advice from knowledgeable experts to ensure opportunities are not missed. The menu, adapted for a local or planned area could include:

- a) Improved soil health
- b) Improved water quality
- c) Better air quality

- d) Increased biodiversity
- e) Climate change mitigation
- f) Enhanced beauty, heritage and engagement with the natural environment.

Council's response to the following question is as the previous question. Much will depend on the location. In some areas some of the public goods will be more relevant than in other areas. We again stress the need to include all these important potential public goods and enable local selection to reflect local priorities.

5.2 Of the other options listed below, which do you consider to be the most important public goods that government should support?

- b) High animal health and welfare standards are currently delivered. There is no need to improve standards, but the existing high standards should be maintained. There is no proven cost benefit to farmers improving animal welfare above our existing UK standards.
- c) Protection of crops, tree, plant and bee health – valuable ecosystems and biodiversity
- e) Preserving rural resilience and local farming practice in the uplands. There is significant variation in local practices and this diversity should be maintained especially that associated with upland farms, however industry development must be encouraged and supported.

5.3 Are there any other public goods which you think the government should support?

1. Restoration and protection of the historic environment including archaeological sites.
2. Public access where additional costs have been incurred by the farmer due to public access; vegetation control and management, removal of stock from areas and compensation for efforts related to increased numbers of people entering farmed land.

6. Enhancing our environment

Council welcomes the intention to learn from the past and to offer the opportunity to trial new innovative approaches to land management schemes and delivery.

6.1 Which outcomes would be best achieved by incentivising action across a number of farms or other land parcels?

All the potential public goods and ecosystem services listed have the potential to be more successful if delivered over larger areas of land. However the means of attracting groups of farms to work together to deliver some or all of these aspects of natural capital is complex and the effort required should not be underestimated. Previous experiences must be considered especially how common land has been brought into AE agreements and treated.

Whilst all could benefit from delivery over a larger area some may be more relevant than others in specific locations. All these potential benefits should be included in the proposed environmental land management scheme (elms). Most are particularly relevant to the uplands and such outcomes would be acceptable to most hill farmers.

There needs to be caution when setting outcome (targets) for species recovery. The recovery of species is dependent on many factors including the provision of the appropriate vegetation and land management. Third part interference, weather, accidents and poor science/advice can all affect the outcome of efforts to protect and enhance selected species. All these issues lie outside the influence of the farmer (agreement holder) so focusing on providing a species' habitat might be a better outcome rather than on an outcome related to the number or quality of a specific species.

6.2 What role should outcome based payments have in a new environmental land management system?

Outcome based agreements including payments require a new approach. Such a change would be welcomed by most farmers but to work there must be a clear outcome or outcomes

with little ambiguity. The outcomes must be understood by the deliverer (farmer) and the agency administering the agreement. Regular (annual) reporting gives confidence to both parties that they are heading in the right direction – towards the outcome. The time to achieve the outcome must be realistic, some can be achieved quickly (access provision and maintenance) and others take many years. This does not pose an issue if the time line is clear and achievable (moving towards establishing a specific type of vegetation rather than seeing it established). Enabling the potential deliverer, the farmer, to be involved in setting the outcomes will increase ownership of the agreement and ensure improved communication and likely success.

A tiered payment system linking the number of outcomes to the level of payment should be trialled and tested. Initial findings related to Dartmoor Farming Futures suggests such an approach could direct most money (support) to the sites requiring the most effort. Sensible outcomes are those that really are achievable during the lifetime of the scheme.

The proposed environmental land management system/scheme should be incentivised, adequately funded, and made attractive so farmers want to join. Risk of penalties should not be excessive.

There should be a shared vision, shared and clearly understood by the relevant agencies and the farmer. The agreement must complement the farming business.

Provide a facilitation process for common land agreements that recognise that commoners do not always come together through choice.

Payment dates need to be set and adhered to. Agreements that are for long periods must not be changed. Many farmers are now very dubious about entering agreements because the trust between the agreement holders and Natural England has been eroded.

6.3 How can an approach to a new environmental land management system be developed that balances national and local priorities for environmental outcomes?

Providing an outcome based agreement that includes outcome of various importance is relatively straightforward. The first step would be to ensure all the potential outcomes for the area are known and included. There are few parts of the UK where the ecosystem services and local priorities are not known. If the area was important (internationally and/or nationally) for a specific public good (e.g. carbon stored in peat or water catchment) then the appropriate outcome would be included in the menu of options but may be compulsory; no agreement application would be successful if it did not include these outcomes. Locally relevant outcomes may not need to be compulsory but could be incentivised by appropriate payment and information on the importance of this particular outcome to the local vicinity – most farmers would be pleased to enhance their location.

6.4 How can farmers and land managers work together or with third parties to deliver environmental outcomes?

The experience of commoners working together is of great relevance to this question. Many commons have been in various agri-environment schemes for over 30 years. Their experiences and those of the administrators of these agreements will be very helpful.

Some learning is already obvious. Collective agreements take longer to establish and require management to succeed. There must be clarity of purpose and the opportunities to explain to all potential participants. Skilled facilitation is an asset as is the correct administration structure including legally binding agreements that ensure delivery is not interrupted by bad practice from one participant.

How you incentivise collective working is particularly poorly understood. However the past 30 years of agri-environment agreements on commons has suggested that to rely on a purely financial incentive frequently fails. Experience suggests that the package, although it must include funding to address the extra costs incurred by communal working, must also provide a

clear outcome (what is to be achieved and why) that is understood by all those participating in the collective. It also needs to include processes that enables all the farmers to engage, providing opportunities for them to contribute their expertise and skills and (and this cannot be stressed enough) there must be sufficient time; collective working takes much longer. If you get this right the reward is an agreement that has farmer ownership, one they take responsibility for, engenders pride amongst all the participants and delivers its objectives.

The commoning community would be able to provide further thoughts on how to develop collective working. Commoners can offer lots of information on good and poor past practice.

The payment to collectives also requires much careful consideration. Whilst looking attractive (less people to pay) if the process is not transparent and clearly understood it can result in disillusionment and dissatisfaction that have an adverse impact on the agreements ambitions.

The sharing of a suite of outcomes relevant to the area by all farmers in a locality might be a better model than trying to encourage groups of farmers to enter the same agreement. Sites are variable, even with an area such as Dartmoor there is significant variation between commons and stocking rates and agreement dates for selected actions often fail to recognise this variation. Failure to reflect local conditions can lead to the agreement failing to deliver the outcomes required.

Whilst the Dartmoor Farming Futures trial is held up as a good example, there is still room for improvement. If the proposed environmental land management scheme is to address a wider set of priorities including rural resilience and significant cultural issues the proposal will need to adopt some new and novel approaches. This will require testing and piloting to aid scheme is development.

8. Supporting rural communities and remote farming

Council welcomes the acknowledgement that the UK's uplands require special measures to sustain the rural community. We are also grateful to see Dartmoor Farming futures included as an example of a farmer inspired and designed scheme that addresses many of the issues raised in this consultation. Council has been a member of the Partnership that guides DFF since innovation started.

8.1 How should farming, land management and rural communities continue to be supported to deliver environmental, social and cultural benefits in the uplands?

Whilst many of the options do impact on rural businesses they are not necessarily the determinant factor of success or failure. Many rural businesses who employ staff have great difficulty in either getting staff to work because the public transport is non-existent, or there is no affordable rural housing for them to live in locally.

There is a rural housing crisis. In the National Parks planning policy can prevent the small development of one or two affordable houses in rural locations and the extra costs associated with building within a National Park, because of specific planning requirements, from burying an electric supply to the style of the house, influence the affordability of the home.

Houses outside of villages for farmers, farmworkers, rural workers and families are required. Rural skills are largely held by members of the rural community, but the lack of affordable housing means they must move away, taking their skills set with them.

The importance of social capital in rural areas must be recognised. The farming community have maintained a strong presence over many generations especially in the uplands, providing the glue necessary to a community. This is an asset without value, yet of such importance.

What should Government do?

If the landscape and its associated natural capital are the products that are wanted, then it will need to be funded. Farmers whilst producing food or by participation in a land management

scheme have produced and maintained much that is valued today. It would be dangerous to underestimate the importance of food production and its key role. It is the essential driver for most activity in the countryside and underpins the rural communities.

Building trust between the rural community and the Government is essential; the negativity often associated with farmers is a real barrier to constructive development and innovation.

Farmers care for the environment – in return for support, farmers will continue to make our uplands vibrant, viable and an asset to the country.

8.2 With reference to the way you have ranked your answer to the previous question, what should government do to address the challenges faced by rural communities and businesses post-EU Exit?

- The UK must continue to maintain the high animal health and welfare standards, it is expected of our customers.
- Value home food production.
- Develop appropriate policy and practice that is based on risk management and resilience: disease outbreaks are devastating and currently bovine Tb and the associated regulations are having a detrimental impact on cattle farmers in the hills.
- Regulatory culture: change the attitude of inspections. The majority of farmers are not out to deceive government. Trying to adhere to the raft of regulations is exceedingly difficult. Offer advisory visits to farmers to ensure they are compliant, help them become compliant rather than random on-farm inspections that instil fear into the farmer. This may also have a positive effect on the mental wellbeing of the farming community.