

Health & Harmony – the future for food, farming and the environment in a Green Brexit - Peak District Land Managers Forum (PDLMF) responses to the consultation questions.

NB This response has been prepared responding to the questions rather than the consultation chapter numbers.

1. Reform within CAP

Consultation questions

Please rank the following ideas for simplification of the current CAP, indicating the three options which are most appealing to you:

- a) Develop further simplified packages
- b) Simplify the application form
- c) Expand the online offer
- d) Reduce evidence requirements in the rest of the scheme

How can we improve the delivery of the current Countryside Stewardship scheme and increase uptake by farmers and land managers to help achieve valuable environmental outcomes?

Simplification of the Basic Payment Scheme (BPS) would be beneficial: -

- Applicants are already used to the application form and process and it would be best if this was left as is for the moment.
- However there has been a series of constant mapping changes, most recently brought about by poorly interpreted satellite monitoring (Remote Sensing) and OS map changes. Many of these changes have been less accurate than the information (RLE1 forms) submitted by farmers and their agents. If a farm has a history of submitting RLE1 forms then this information should take priority over any revised OS data as it is likely to be more accurate. Any mapping changes the RPA wishes to make should be approved by the applicant **before** the RPA make the changes.
- Whilst a medium term ambition to expand the online offer is supported at the present time this is likely to be fraught with difficulties especially if the recent hedge maps are an example of what happens when there is further development of the on line offer. For the moment it would be best to leave the current system as it is and to make sure any new offers are fully tested and piloted before being introduced.

In terms of simplifying and improving the uptake of Countryside Stewardship Scheme

- Currently Countryside Stewardship is still not working effectively for upland areas such as the Peak District National Park and large areas of our special landscapes are coming out of agri-environment schemes which could lead to land management changes with detrimental impacts on the natural and cultural environment.
- It is suggested that Government recognition of Countryside Stewardship issues; a clear improvement plan; clarity for a future domestic scheme properly rewarding farmers and land managers for the full range of public goods; will all be essential if the current environmental and cultural interest is to be maintained – let alone be enhanced at a landscape scale.

In terms of improvements the following is suggested: -

- Improve the experience of applicants, agreement holders and repair the damage to the reputation of the scheme: -
 - Reduce the time it takes for application packs to be sent out
 - Prevent more mapping changes
 - Introduce more application windows and start dates asap as this would even out the workloads for farmers, land managers, agents and NE. It would also reduce any support payment gap for agreement holders who are changing from Environmental Stewardship to Countryside Stewardship.
 - Get agreements and payments out on time
- Further simplification of the application, guidance and agreement

- Reduce the evidence requirements and associated record keeping which are particularly onerous for feature rich grassland livestock areas such as the Peak District National Park.
- Some of the land management option payment rates are very low and do not adequately pay the farmer for the income forgone and extra costs let alone begin to reward for the public goods delivered by the option e.g. SDA low input for grassland at £16/ha is not remotely an attractive option.
- The general problem with the payment rates is that they bear no relation to the “environmental benefit” that the option is supposed to deliver. This is hard to clarify, but the document does single out restoring stone walls as something that delivers relatively high environmental benefit – so this is an option where the payment rates should be reviewed. In general, it would seem that while some payment rates are adequate to incentivise farmers, others are not enough. Data on the uptake of the various options, and the extent of uptake (or not) should help to make it clear which options do not have adequate payment rates. These uptake rates should be reviewed so that farmers are adequately incentivised in future.
- The on-line offer could be extended but there will for the moment need to be a paper alternative available – again particularly in the remote upland areas where broadband connectivity is often poor and not all farmers and land managers are ready to move to an on-line process. The current on line offers need to be reviewed and any lessons learnt before other on-line offers are piloted.
- So far the simplified upland package has proved unattractive for SDA land as the main interest is the use of GS6 Species rich grassland option but in practice there are a number of issues with the availability and applicability of this option which are making this option difficult to access (Details of these have already been provided to Defra and NE). Without the inclusion of capital work grants particularly for the restoration of walls and hedges the simplified upland package is just not attractive enough. So farmers are more likely to consider the full Mid-Tier offer or just the Hedgerows and Boundaries Grant Scheme which alone will not maximise environmental potential.
- Need a new approach to audit and control as within the EU a culture of fear of disallowance has developed. The Rural Payment Agency (RPA) has had to take a single interest – avoiding disallowance – and perhaps an overly detailed view of audits e.g. under-delivery is currently recorded to two decimal places whilst over-delivery is not counted; ineligible features are judged severely when they often deliver good environmental benefits . New guidance for inspectors should be created providing greater use of discretion.

2. An agricultural transition

Consultation questions

What is the best way of applying reductions to Direct Payments? Please select your preferred option from the following:

- Apply progressive reductions, with higher percentage reductions applied to amounts in higher payment bands *
- Apply a cap to the largest payments
- Other (please specify)

* please provide views on the payment bands and percentage reductions we should apply.

What conditions should be attached to Direct Payments during the ‘agricultural transition’? Please select your preferred options from the following:

- Retain and simplify the current requirements by removing all of the greening rules
- Retain and simplify cross compliance rules and their enforcement
- Make payments to current recipients, who are allowed to leave the land, using the payment to help them do so
- Other (please specify)

What are the factors that should drive the profile for reducing Direct Payments during the ‘agricultural transition’?

How long should the ‘agricultural transition’ period be?

- Transition period – whilst the focus is on what will happen post Brexit there is a real risk that the transition period between now and the new scheme coming in to effect could be characterised by environmental damage (through reduction in the area of land under agri-environment agreements) and an economic impact (through the reduction in number of agreements, delays in payment, and the multiplier effect this has within the local economy). This risk could potentially be mitigated by facilitating the extension of existing Stewardship agreements subject to any necessary European Commission approvals.
- The proposed redirection of direct payments from a payment for the area of land owned/managed to the delivery of a full range of public goods is potentially a good thing for society. The transition period should be characterised by clear evidence of the transfer of funds including that farmers in upland areas have immediate access to the funds being transferred in order to invest in providing “public goods”. There should be a managed process to allow businesses to adapt to the process of Brexit. This includes the new trading and labour regimes and any new payment for public goods based scheme that will be available.
- Ideally we would not want to see a cap put in place. By progressively reducing the payments to farm businesses you are progressively reducing their ability to invest in the measures that will be required to ensure their continuation once BPS ceases completely. A reduction or cap makes it harder for farm businesses to make the necessary adjustments and business changes that will be required to survive and thrive in a post BPS environment.
- If the government are set on reducing the direct payments, then as limited a reduction as possible should be applied and smaller businesses should be shielded to a limited degree. These reductions must be at a manageable level and over a reasonable timescale to able businesses to adapt.
- The percentages in option (i) are the preferred option of those offered, however the highest reduction of 75% for the largest area claimants does seem excessively high.
- Any reductions must be invested back into the industry and into environmental land management in particular and not diverted elsewhere. This could be in the form of testing, trialling and piloting elements of a new environmental land management scheme, investigation in research for the new scheme. It should not be diverted towards the provision of digital infrastructure which is provided for elsewhere.
- Businesses need a clear direction of travel and need to know what any future scheme will involve to enable them to plan for it accordingly. Businesses cannot be expected to plan when there is a vacuum of future policy, regulation and support scheme details; this is not just in the form of any future schemes but the details of future trading relations and labour markets.
- Greening requirements should be removed. There is little benefit gained by these requirements and significant burdens placed upon businesses.
- Cross compliance should be retained but simplified.
- The complex and disproportionate inspection and enforcement provisions should be changed.
- A scheme to provide a financial assistance to retirement for those that wish to exit the industry could be investigated. This would assist those who wish to exit the industry to do so and free up land for new entrants and expanding businesses. We would not wish to see “naked acres” as a result though as this could put any new entrants at a disadvantage and stifle new enterprises. Payments should be for a limited period and for the purpose of making the transition.

3. A successful future for farming – farming excellence & profitability

Consultation questions

How can we improve the take-up of knowledge and advice by farmers and land managers? Please rank your top three options by order of preference:

- Encouraging benchmarking and farmer-to-farmer learning
- Working with industry to improve standards and coordination
- Better access to skills providers and resources
- Developing formal incentives to encourage training and career development
- Making Continuing Professional Development (CPD) a condition of any future grants or loans
- Other (please specify)

What are the main barriers to new capital investment that can boost profitability and improve animal and plant health on-farm? Please rank your top three options by order of the biggest issues:

- a) Insufficient access to support and advice
- b) Uncertainty about the future and where to target new investment
- c) Difficulties with securing finance from private lenders
- d) Investments in buildings, innovation or new equipment are prohibitively expensive
- e) Underlying profitability of the business
- f) 'Social' issues (such as lack of succession or security of tenure)
- g) Other (please specify)

What are the most effective ways to support new entrants and encourage more young people into a career in farming and land management?

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

How to improve the take up of knowledge and advice by farmers and land managers?

- There is a feeling that there needs to be a stronger link between agricultural colleges and the uplands with a stronger focus on the full range of public goods as well as food production that these upland holdings deliver. There still seems to be a mismatch between training for conventional agriculture and food production and environmental conservation. Going forward it will be important to bring the delivery of public goods more to the fore in agricultural/environmental courses for future upland farmers. This may require more research.
- It is felt that there is a lot of research being undertaken for lowland agriculture but that opportunities to apply these to upland livestock farming are not often explored e.g. use of drones for selective weed control, technology and plant science to enhance biodiversity, soil and water health assessments, pollinator approach applied to grassland rather than arable. So the uplands could be seen to be lagging behind in this respect.
- Encourage benchmarking and farmer to farmer learning.
 - Peer to peer is a very positive method of learning and knowledge transfer. It allows farm businesses to see others who are using different techniques. It enables them to understand the practicalities of a particular practice, from someone actually doing it in the real world, and not simply the theory.
 - Benchmarking can provide real benefits to farm businesses by enabling them to directly assess their own performance against that of similar enterprises. The areas to be assessed would need further research and development but would include indicators and measures such as productivity, a full range of public goods provision, and a suite of performance indicators. This real world data can help a business identify its areas of strength and weakness and adjust and adapt accordingly. Expanding the current farm business surveys may provide a good starting point and enable the use of existing data.
- Utilising and building existing networks and groups rather than creating new ones should be a priority. We do not feel that the Agriculture and Horticulture Development Board should necessarily be seen as the provider of first choice.
- There are opportunities to bring farmers/land managers and conservation body land managers thinking and experience together via joint training/knowledge exchange events/farm walks.
- One to many and one to one advice should be available using local experienced and trusted advisors.
- Business, financial and management skills should be a key offering to the farming community to enable them to up skill in these areas. With the changes that many farm businesses are going to have to make, business knowledge is going to be essential.
- We believe that formal CPD is a step too far for many farmers at the moment. However having a clear programme of courses and other learning available to cover new skills e.g. environmental land management, soil health, would be good. Useful and applicable training should be readily available as part of a scheme but it should not be compulsory.

Main barriers to new capital investment:

- The lack of broadband and digital infrastructure.
- Underlying lack of profitability within farming businesses.
- Many upland farms simply struggle to make a profit. Farm businesses would prefer to be able to re-invest their own profits rather than rely on grant finding but the underlying lack of profitability in the upland livestock sector makes this almost impossible. Continuing support is essential if the current Landscape assets are to be maintained. Additional support will be needed if landscape scale enhancements are to be delivered.

- Cash flow to deliver capital works whether for large scale moorland restoration or productivity improvements is often a real issue particularly for the smaller holdings which typify many of the National Parks especially the upland ones.
- Planning. The current planning system can be a barrier to new investment or changing practices. The pre-application system appears to be improving things in the Peak District National Park. Training for planning officers on farming requirements and rural issues has been shown to be very beneficial. Specific training and guidance for planning officer on any future schemes should be provided so that they understand what government priorities are and what farming businesses are being asked to do e.g. this was done successfully by the Peak District National Park Authority when Catchment Sensitive Farming capital grants were introduced.
- Brexit uncertainty - with a lack of information about what future trading relations and labour markets will look like, future business planning is difficult
- There is a lack of tax incentives for the provision of new buildings. The erection of new buildings should be treated similarly to the purchase of new machinery for tax purposes. In addition to the benefits new buildings offer the farming businesses and animal health/welfare, there are often substantial knock on effect for the local economy with local trades benefitting.

Supporting new entrants and encouraging more young people into farming

- There needs to be an improved framework and pathway for young people and new entrants coming into farming and land management. The promotion of farming and environmental land management (and associated agricultural/environmental related industries) as a career should be encouraged so that this career is viewed positively and as an interesting and exciting future.
- There are many different ways that new entrants can enter farming other than the traditional landlord and tenant or owner occupier structures. These should be encouraged and promoted e.g. contract farming, share farming.
- Young entrants often start with small blocks of land or small holdings so it will be important that these types of holdings remain eligible for the support schemes and that they have access to a full suite of options.
- Apprenticeships in farming must be made available and should be designed with the smaller family farms in mind as well the larger agricultural employers. This could involve smoothing the way for apprentices to be shared across say two or three farms.

Does exiting tenancy law present new barrier to new entrants?

- We do not believe that current fixed term farm business tenancy law presents a barrier to new entrants, productivity or investment. There are now many more ways to get into the farming industry than the traditional landlord and tenant relationships.
- Agents, solicitors and advisors do need to make full use of the suit of options available when advising their clients and not just adopt a standard approach to land letting or farming businesses arrangements.
- Making tenancies too long by statute will simply stop landowners letting land.
- There is some evidence to show that older Agricultural Holdings Act style tenancies stifle productivity and bars new entrants from land for a long period of time. They can also stifle a move to a more environmentally sustainable land management.

4. A successful future for farming – agricultural technology & research

Consultation questions

What are the priority research topics that industry and government should focus on to drive improvements in productivity and resource efficiency? Please rank your top three options by order of importance:

- Plant and animal breeding and genetics**
- Crop and livestock health and animal welfare**
- Data driven smart and precision agriculture**
- Managing resources sustainably, including agro-chemicals**
- Improving environmental performance, including soil health**
- Safety and trust in the supply chain**
- Other (please specify)**

How can industry and government put farmers in the driving seat to ensure that agricultural R&D delivers what they need? Please rank your top three options by order of importance:

- a) Encouraging a stronger focus on near-market applied agricultural R&D
- b) Bringing groups of farms together in research syndicates to deliver practical solutions
- c) Accelerating the 'proof of concept' testing of novel approaches to agricultural constraints
- d) Giving the farming industry a greater say in setting the strategic direction for research funding
- e) Other (please specify)

What are the main barriers to adopting new technology and ideas on-farm, and how can we overcome them?

The priority topics are considered to be: -

- Livestock health has perhaps had too low a profile in current policy, and a new support system which prioritises animal health in terms of increased public money for livestock dominated areas such as national parks and upland areas is regarded as a priority.
- Disease eradication such as BVD, and especially bovine TB and control of Johnes (more research required on reliable testing). Incentives for the industry to drive the process are needed but with legislation to make the slow adopters conform.
- An all-encompassing animal data base that works and allows animal owners to see the full animal disease status and history would be helpful.
- Work to provide guidance on what good soil health looks like e.g. soil organic matter (although generally not an issue in permanent grassland), soil carbon (hard to measure short term trends), soil fauna (earthworms etc.), soil flora (mycorrhiza), soil compaction.
- Work to clearly identify any water vulnerable zones such as in the White Peak to ensure that no blanket protection zones are applied but that there is better understanding of those areas where any agricultural diffuse pollution is likely to run through limestone fissures and enter water courses.
- Robotics – use for individual weed control could be extremely useful in terms of reducing labour cost and protecting the environment. However we should not become fixated on pushing up take of robotics; if they are good the market place will adopt e.g. robotic milkers work for some farms but not all.
- Techniques to reduce grassland inputs:
 - Affordable precision application of fertilizers.
 - More effective weed wipers or robotics as above.
 - Herbage leys with a range of pollinators – could reduce inputs and increase productivity and biodiversity.
 - Slot seeding to avoid ploughing and any need for herbicides/pesticides – need to increase its success to broaden appeal.
 - Holistic grazing

To put farmers in the driving seat to ensure that agricultural R&D delivers what they need we suggest: -

- Establish more focus farms and use existing discussion groups – do not set up Agriculture and Horticulture Development Board to organise more. These existing groups can suggest research and be involved in the near market testing and then promoting.
- There is also the opportunity for farmers, land managers and ecologists etc. to collaborate and identify R&D projects which will help inform how we can together deliver a full range of public goods including food production.

Ideas for how to overcome the main barriers to adopting new technology and ideas on-farm: -

- If cost savings and benefits are not obvious then uptake is slow – so testing must be independent and not linked to companies promoting the technology.
- If new technology makes an obvious difference it is soon adopted.
- Focus farms or on farm demonstrations are a good way to demonstrate the benefits of new technology and its practical application.

- Peer to peer learning needs to be encouraged so the successes of early adopters can be communicated and spread. Such early adopters should be rewarded for taking initial risks and spreading their knowledge and experience as trainers.

5. A successful future for farming – labour – a skilled workforce

Consultation questions

What are the priority skills gaps across UK agriculture? Please rank your top three options by order of importance:

- Business / financial
- Risk management
- Leadership
- Engineering
- Manufacturing
- Research
- Other (please specify)

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

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

- It is not possible to rank priorities as each business will have its own needs and requirements so generalisations should not be made.
- Business skills are however going to be a key requirement to enable the sector to adapt.
- Technological skills are also going to be a requirement as agriculture and public good delivery become a more data and technology focused industry.
- As previously mentioned there needs to be an improved framework and pathway for young people and new entrants coming into farming and the promotion of this as a career should be encouraged.
- The importance of and requirement for farming which delivers of a full range of public goods needs highlighting for aspiring farmers and land managers in the uplands.
- Apprenticeships in farming and environmental land management (preferably both areas being offered to apprentices as part of their training) must be made available and must be designed with the smaller family farms in mind as well the larger agricultural employers. This could involve smoothing the way for apprentices to be shared across say two or three farms.
- Farmers and land managers need the skills to be able to promote the range of public good and services that they provide as well as to promote the traditional agricultural commodities they produce. This includes an expanded knowledge of environmental land management outcomes, which the outcomes pilots are really delivering.

6. Public money for public goods

Consultation questions

Which of the environmental outcomes listed below do you consider to be the most important public goods that government should support? Please rank your top three options by order of importance:

- Improved soil health
- Improved water quality
- Better air quality
- Increased biodiversity
- Climate change mitigation
- Enhanced beauty, heritage and engagement with the natural environment

Of the other options listed below, which do you consider to be the most important public goods that government should support? Please rank your top three options by order of importance:

- a) World-class animal welfare
- b) High animal health standards
- c) Protection of crops, tree, plant and bee health
- d) Improved productivity and competitiveness
- e) Preserving rural resilience and traditional farming and landscapes in the uplands
- f) Public access to the countryside

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

Environmental outcomes and public goods: -

- **We feel that all the environmental outcomes and public goods are important and interdependent.**
- However in the context of an upland National Park such as the Peak District then enhanced beauty, heritage (including cultural heritage) and engagement with the natural environment; increased biodiversity and climate change mitigation are crucial as are preserving rural resilience and traditional farming and landscapes in the uplands and public access to the countryside.
- **The principle of public payment for public goods is fully supported** and especially for increasing the amount of public money which goes into the national park landscapes.
- Support for delivery of environmental goods in upland national parks is intrinsically linked to the **need for increased support for animal health**, as this underpins the strength of livestock farming in such areas.
- **Future payments will need to be for both maintaining/sustaining existing features and habitats** above the statutory minimum and enhancement (restoration and/or creation) of public goods. There is a risk with an enhancement only focus that you effectively discriminate against those who have maintained the environment and perhaps have less opportunity to now enhance it than those who did not act as good custodians in the past.
- **There should be support for the delivery of a full range of public goods particularly for protected upland landscapes** such as the Peak District National Park. There needs to be a holistic approach for the delivery of the public goods listed above and in addition flood mitigation, carbon management (sequestration, reduction of emissions and permanent storage), cultural heritage, access & recreation and health and well-being. Each public good is important in its own right and priorities will vary by location. Delivering multiple benefits – the [Farming in the English National Parks](#) paper advocated an approach of focused on delivering multiple public benefits from an area or single parcel of land rather than a narrow focus on one or two objectives as per the current Countryside Stewardship scheme.
- We need an approach based on ‘natural beauty’ which includes natural capital (since this includes wildlife, habitats, air, soils, geology, water, and other resources) and cultural and historic heritage as well as the wider landscape – and which reflects how it all is put together and fits together. The Command Paper seems to indicate a move towards a broader approach to public benefits but it will be important to emphasise the value of this approach and to ensure that landscape in its fullest sense is at the heart of the new scheme, this will include all habitats, species and cultural heritage.
- The clear direction of travel as set out in the Government’s 25 Year Environment Plan is welcomed as all businesses and emerging future generations of farmers and land managers need to have confidence in the continuity of future policy and support systems. **It is vital that the scale of ambition and public money that will be committed to securing public goods is agreed and ring fenced for the long term. Around £30 million/year was coming into the Peak District National Park through CAP in 2015 and we were still losing habitats (quantity and quality) especially species rich grasslands. So it will take almost double this amount - £50 million plus a year - to maintain and further restore and create more habitats**, to deliver the aims of the 25 Year Plan including the Government’s stated ambition ‘to be the first generation to leave the environment in a better state than when they found it’.
- **Whilst food production is not technically a public good it is a key deliverable from the upland areas.** The aim should be sustainable food production which works with and enhances the natural and cultural interests and which is in balance with the full range of public good deliverables as listed above. Recognition of improved productivity (where it is environmentally sustainable) and competitiveness as a public good is welcomed. The same can also be said for the production of timber, wool and game.

- Preserving rural resilience and traditional farming and landscapes in the uplands is essential although this could be interpreted as: - Conserving and enhancing rural resilience, traditional/new farming/land management and landscapes in the uplands. **It is agreed that a resilient and sustainable approach to land management is key if the special landscapes such as the Peak District National Park are to be conserved and enhanced.** Whilst 86% of the area is classed as severely disadvantaged and is therefore naturally constrained in terms of the options available for management - the area is outstanding in terms of the full range of public goods delivered – not just food production. **Properly rewarded, continuing and unbroken support is needed if farmers and land managers are to deliver the full range of public goods which these landscapes are suited to deliver.**
- **Further improvements to Countryside Stewardship are needed and a smooth transition to a new domestic scheme is required** if farming and land management practices are to evolve in a way which sustains and enhances both the natural and cultural environments.
- **The new scheme needs to fully embrace the fact that delivering land management is not black and white and cannot be measured in a computer or with rulers.**
- Although heritage is mentioned in the first section of the question this is in connection with enhanced beauty and engagement with the natural environment – **cultural heritage should be a public good in its own right.** Indeed cultural heritage can be very visible and therefore iconic e.g. traditional buildings, industrial remnants such as leadrakes, walls, ridge and furrow etc. or it can be invisible underground archaeological features such as burial sites.
- **Public access and its role in providing health and wellbeing is perhaps the most tangible and wide-reaching public good.** There is now very strong evidence for the mental and physical benefits of being active in the outdoors. Indeed public access was the main reason for the creation of the first and original National Park – the Peak District National Park. The National Trust’s founders also had the insight that we need beautiful places to re-charge our minds and bodies. Not only does public access and recreation deliver a range of benefits for health and wellbeing but it also supports and underpins the rural economy through tourism.
- It is important that any new scheme has much great ability to support farmers and land managers in delivering for access if they want to – it is a fundamental public good that many farmers and land managers already provide.
- **Access (and of course looking after the land) is a major driver of rural economies especially where tourism and/or other types of visitor use are important.** The problem is that the providers of the access and the land that people are coming for very often cannot benefit from the visitor spend because access is often, rightly, free at the point of use. However, many other businesses trade off the visitors coming, which both sustains their businesses; the wider network of businesses; and indirectly the wider local community who have more facilities and options because the economy is working. Uplands like the Peak District are often extremely important visitor destinations and nationally designated landscapes e.g. National Parks, AONBs where the asset is the landscape, its wildlife and cultural heritage but where the providers and carers of these assets cannot generally secure income from the millions of visitors. There is a clear option here to therefore use public money to support the infrastructure (environmental and access) on which a huge part of the economy (tourism, visitor, rural local services) depend. If we want thriving rural areas we need to as a society support these core services (healthy environment/access) where the market can’t or won’t be able to.
- What is meant by public access should be clearly defined and could include: -
 - new and enhanced rights of way including potentially upgrades (concession rewarded by an annual payment or permanent with a one-off capital payment) from say footpath to bridle path
 - the creation of multi-use routes
 - new area access
 - educational access

There should be an emphasis on key linkages for a joined up and integrated access network including to areas of open access.

- Support for the infrastructure for these access provisions could be provided including: -
 - access gates rather than stiles,
 - restoration of historic features such as historic stone stile, stone pitching, and
 - surface improvements to increase accessibility for those who are less-able.
 - surface maintenance where user pressure is great. Rights of way were never designed for the levels of use which they now get e.g. the Peak District National Park where there are more than 12 million visitors a year.
- There should be a way of supporting access that isn’t also dependent on having lots environmental assets to score high enough in a competitive scheme so access may need to be part of the base/universal level of the new ELMS.

- It is important that the provision of any public access by a landowner is voluntary, flexible, time limited and does not create any new permanent right of access unless with the agreement of the landowner. It must enable a wide variety of measures to suit local circumstances and to reflect the quality and character of access and the landscape in that area, including existing access provision, and consider both traditional and non-traditional forms of access, such as infrastructure (subject to planning requirements). The payments should reflect the risks, costs, impact on adjacent land and business activities as well as the public goods delivered in terms of access for all and health. The payments for the creation of new access could be either on an annual basis or as a one off capital payment for permanent rights if this was wanted by the land owner and supported by the Local Access Forum.

7. Enhancing our environment

Consultation questions

From the list below, please select which outcomes would be best achieved by incentivising action across a number of farms or other land parcels in a future environmental land management system:

- Recreation
- Water quality
- Flood mitigation
- Habitat restoration
- Species recovery
- Soil quality
- Cultural heritage
- Carbon sequestration and greenhouse gas reduction
- Air quality
- Woodlands and forestry
- Other (please specify)

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

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

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

Outcomes best achieved by incentivising action across a number of farms in a future environmental land management system: -

- We welcome the proposed shift of public money to national parks and other upland areas for the delivery of a full range of public benefits. All of the above outcomes will be better delivered if action is incentivised across a number of holdings i.e. at a landscape scale – although the area involved will vary from area to area. Fundamentally a new ELMS needs to properly reward participants for the public goods they deliver and be attractive enough for a high level of uptake at both the base/universal level and the higher level.
- All of the outcomes listed above can be incentivised in future schemes through environmental land management (sustainable farming practices, forestry and woodland creation and management of existing woodland, moorland and grouse moor management).
- Environmental benefits can also be achieved through improved animal health and welfare.
- Incentivising a number of farms to work together in an area will also encourage a more integrated access and rights of way network with the option for routes providing alternative transport opportunities, such as cycling, and for linking and supporting communities and the wider tourism economy. However it cannot be assumed that farmers and land managers will automatically engage in future environmental schemes. Future schemes must be economically attractive, administered competently and fit within diversified rural businesses. If these preconditions are met then environmental outcomes will be delivered at scale.

- The future scheme should be a place-based approach which could be either at for example at a National Park or National Character Area basis. Delivering multiple public benefits requires you to understand the geography of the place. National Park Authorities are well placed to do this, working with farmers, land owners and land managers. The consultation asks do you think water quality is more or less important than increased biodiversity or climate change mitigation. Working with place, enables you to overcome these simplistic silos and often false choices. National Park Authorities have been working with and delivering a balanced multi objective rather than a single focus approach for many years and as such are well placed to share experiences of what works.
- In upland areas traditional estates are major land managers e.g. in the Peak District estate size varies from 200 ha to 7,500 ha. As such they are well placed to work together with their tenants and/or adjoining land managers to deliver at a landscape scale particularly for habitats, carbon storage and sequestration, flood management, clean water and public access and recreation.
- Most of the outcomes listed are better delivered at scale i.e. across groups of landholdings or landscapes. For biodiversity this has been elegantly demonstrated by the Lawton Review 'Making Space for Nature' and widely accepted. Mechanisms to facilitate this therefore need to be developed including incentives but also crucially professional advice for farmers and land managers.

What role should outcome based payments have in a new environmental land management system: -

- Outcome/results based payments should be part of a future scheme. The results based pilot in the Norfolk and the Yorkshire Dales will provide evidence of what works well and what doesn't. There is scope and time to further test this approach before a new national/universal scheme is fully developed and piloted. The results of other EU outcome based pilots will also help inform a new domestic scheme.
- Outcomes could also include the retention, maintenance and restoration of key landscape features such as walls, hedges, shelter belts not just habitats and species. Such features really jump out and enable the story of the public goods delivered to be shared more widely than perhaps carbon storage, clean air and water can be.
- There is also a challenge to see whether a new Scheme can be imaginative enough to enable different approaches and outcomes. As an example the emerging area of naturalistic grazing where natural processes are prioritised over for example fixed geographical outcomes or fixed habitat points. There are not many upland examples in England yet but in the lowlands the Knepp Estate approach is showing a very interesting way forward, which may be part of a more diverse approach to land management going forward.

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

- **National framework with local flexibility and delivery: –**
- A new domestic environmental land management scheme could be established under a national framework with the flexibility to deliver locally to suit local circumstances, need and opportunities.
- Future delivery could be based on national character areas (NCAs) so that there is a strong picture and identity to the full range of public goods which a future environmental land management scheme could support e.g. the Dark Peak, South West Peak and White Peak in the Peak District National Park.
- The NCAs also have local targets and priorities set out which will help set the objectives locally.
- Access elements should be available in a targeted approach for added value with alignment to Rights of Way Improvement Plans, Cycling and Walking Investment Strategies, and other local priority programmes
- Delivery bodies need to be resourced properly to deliver and any IT system and process needs to support the outcomes rather than act as a blocker to local variation.
- The proposal to test, trial and pilot aspects of a new domestic scheme as early as possible is supported. Farmers and land managers here in the Peak District are keen to support Defra in this and have already developed pilot ideas for a new ELMS to deliver in the White Peak.
- **Co-designed** - designed in partnership with the farming and land management community.
- **Whole farm base level/universal scheme** which would be available to all on a whole farm basis – “ELS on steroids” with applications automatically accepted on delivering the essential requirements for that particular landscape (NCA).
- All land e.g. woodlands, shelter belts, small areas of scrub, ponds, wet areas, marshes, hedges, trees etc. should be included.
- The PDLMF has produced pilot ELMS ideas for one of the three main NCAs in the PDNP for Defra and this can be provided if required.

- **Discretionary higher level element for the more complex land management options.** This could sit above the whole farm base/universal level and be considered on a part farm basis. This might also be where different approaches, such as naturalistic grazing might be incorporated.
- **Outcome or results based not prescription focused** – this could be based on the Results based pilot being tested out and developed in the Yorkshire Dales National Park and Norfolk. Further testing, trialing and piloting could be developed.
- **A balanced multi-objective approach** is needed e.g. ensure that farming and forestry is integrated rather than compartmentalised which has happened on occasions in the past.
- Scheme objectives, grant availability, and advice that allows for a more joined up approach will help reduce administration, achieve better outcomes, and support whole farm planning.
- **Simpler and more flexible for farmers but also easier to administer and monitor.**
- However from a heritage perspective, there may be an apparent conflict between the desire to simplify the application processes (this is desirable) with retaining the need for specialist advice and input via the Historic Environment Record (HER). Yes, on balance, simplification is appealing, if the protection measures are robust.
- Customer focused – enabling early steps on the conservation ladder and progressively building to a fuller delivery of public benefits.
- **Include ‘landscape mapping’** – natural (e.g. habitats, species, water quality, flood mitigation), cultural and access networks need to be available at a wider landscape scale than the farm holding so that farmers and land managers can see where their holding fits in and how it can contribute to a landscape-scale approach and nature recovery networks.
- There should also be a simple quick method of updating the local/national data set facilitated by trusted people such as the PDNPA advisers.
- **Be based on a whole farm plan** which records the natural and cultural features/assets on the holding and potential new features/assets which is then used to calculate the appropriate base/universal scheme payments.
- **Eligibility** – those who deliver the outcomes or results should be eligible for and receive the funding support regardless if they are a conservation organisation or body.
- **Maximum/minimum payment** – there should be no maximum level of payment if the scheme is to reward the outcomes delivered. An enhanced minimum payment should be explored for young entrants and small holdings.
- **Maximum/minimum area** - there should be no maximum area if the scheme is related to the outcomes delivered. A minimum area of 5 hectares has been suggested but this could exclude new entrants starting to build up their own holding or small holdings with traditional farmsteads which are an important landscape feature or with important but small habitats e.g. species rich grasslands. So it is suggested that there should be a lower minimum area or a minimum area of 5 hectares with exception.
- **Multi occupancy applications** should be eligible and encouraged as this would allow groups of small holders or commoners to apply for the scheme.
- **Application process** - online application and claim approach with a paper process by exception.
- Rolling application window which is continuously open but with quarterly deadlines. Regular updates on applications, commitments and spend as for the Renewable Heat Incentive scheme would effectively encourage submission of applications. This would suit both farmers and land managers who could complete the application process as it suits them and spread the processing work of the administering organisation.
- **Flexibility** – there needs to be the opportunity to review any agreement as required. This should be done by the participating farmer/land manager and a locally experienced adviser which would avoid any complicated derogation process. Examples include changing an option area in the early years of an agreement if it is found just not to work and relocating elsewhere on the holding. If this is by agreement it should not include reclaim of earlier payments under the agreement.
- Need to provide for flexibility to adapt to new knowledge, techniques, innovation and local adaptation, part field interest.
- **Rewards farmers and land managers who have already delivering public goods** - a new scheme should not disadvantage those who are already doing environmentally friendly farming. In favour of those who might adopt these practices.
- Whilst future support scheme prioritisation will certainly include a focus on nature recovery networks, existing pockets of special interest outside these networks should also be supported as this will reward those farmers and land managers who have already maintained and improved these sites and develop the stepping stones/permeable landscapes. This applies both to habitats and cultural heritage.

- **Supported by locally experienced and trusted advisers** on a 1:many basis and if needed a 1:1 basis such as the National Park Authority farm advisers.
- Able to increase public understanding and support for sustainable farming and land management which delivers a full range of public goods.
- **Properly rewards and incentivizes farmers and land managers** to participate and to continue to deliver the desired outcomes. It is crucial that the budget and payment rates are attractive to farmers and landowners if the outcomes are to be delivered at scale. A scheme based on current design and payment rates of cost incurred and income foregone will not be attractive to many. There needs to be further work to develop outcomes for sustainable farming practices which have the potential to deliver a wide range of high value public benefits and support the upland rural communities where there is a high % of SDA land.
- Encourages and supports co-operative working between farmers and land managers thereby fostering better delivery across adjoining farms or within a local landscape. Please note that this would be optional not mandatory.
- **Agreements** - length of agreements – the majority should be for an initial five year period with the opportunity to review the agreement and roll it on for a further five years. Any land management which requires a longer period of time to deliver should have the option of a longer term agreement e.g. woodland creation - 25 years.
- Payments - 75% in advance and 25% at the end of the agreement year
- Monitoring should be based on risk and as joined up as possible so the farmer/land manager has the minimum number of inspections. Inspections should not be feared but seen as an opportunity to explore any issue or need for improvements. The possibility of the Rural Payments Agency, Natural England, National Park Authorities and any other relevant bodies linking in with private sector accreditation/assurance such as Red Tractor, EQM, LEAF should be explored.
- **Wider rural business development support schemes** – the new ELMS should be linked closely with and work in harmony with the new rural development support elements of the new support system. If farm and land management businesses are not resilient and sustainable they will not be able to care for and enhance the environment. So rural development support in terms of business management, bench marking the delivery of all public goods not just food production, diversification, productivity and efficiency are all essential but need to be integrated rather than separate and sometimes conflicting approaches.
- **Increased level of support for the SDA** - up until recently there were higher rates of grants for upland farmers and land managers which helped these businesses increase their productivity/ efficiency whilst respecting the environment when there are fewer options in terms of land management and profit margins are tighter than for lowland farmers/land managers.

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

- There are a number of barriers to collaborative environmental delivery, most of which can be overcome by better scheme design.
- A challenge for collaboration among neighbouring farmers/land managers under current schemes is that they are in competition. There is therefore a disincentive for applicants to tell neighbouring land managers that they are entering into the scheme, or indeed discussing the possibility of collaboration.
- In upland areas like the Peak District National Park holdings are often small over 70% of all holdings are less than 20 ha. So collaboration takes proportionally a greater amount of time.
- A trusted local facilitator/adviser can be critical to organise the bringing together of early collaborative groups.
- Increased flexibility in current schemes means landowners are concerned that adapting agreements to meet group objectives would lead to them being penalised for breaking scheme rules.
- The issue of multiple end/start dates can be barrier to collaboration - applicants could indicate that they want to join a collaborative scheme when they renewed their agreement
- The need for consents for land use change was often a barrier to undertaking work. This could be managed through formal, landscape scale agreements with Natural England and or the Environment Agency to allow for easier positive land use change and changes to waterways to support natural flood management both of these being permitted activities.

8. Fulfilling our responsibility to animals

Consultation questions

Do you think there is a strong case for government funding pilots and other schemes which incentivise and deliver improved welfare?

Should government set further standards to ensure greater consistency and understanding of welfare information at the point of purchase? Please indicate a single preference of the below options:

- a) Yes
- b) Yes, as long as it does not present an unreasonable burden to farmers
- c) Perhaps in some areas
- d) No, it should be up to retailers and consumers
- e) Other (please specify)

*if you answered 'perhaps in some areas', please elaborate.

What type of action do you feel is most likely to have the biggest impact on improving animal health on farms? Please rank your top three choices from the below list, in order of importance:

- a) Use of regulation to ensure action is taken
- b) Use of financial incentives to support action
- c) Supporting vets to provide targeted animal health advice on farm
- d) Making it easier for retailers and other parts of the supply chain to recognise and reward higher standards of animal health
- e) An industry body with responsibility for promoting animal health
- f) Research and knowledge exchange
- g) Transparent and easily accessible data
- h) An understanding of animal health standards on comparable farms
- i) Other (please specify)
- j) N/A – Cannot rank as they are all equally important.

How can the government best support industry to develop an ambitious plan to tackle endemic diseases and drive up animal health standards?

Do you think there is a strong case for government funding pilots and other schemes which incentivise and deliver improved welfare?

- Support the focus on animal health as this is a vital element of an on-going strong rural economy especially in upland livestock upland National Parks.
- Farmers and land managers need to know the end game i.e. what does DEFRA want? What standard is wanted and is this consistent across the market place? A differentiated market of high standards and low standards can result in the low standards segment being filled by cheap imports.
- Not yet clear how pilot schemes would work - a range of rearing systems exist already in all sectors and these often have to adapt to changes in circumstance e.g. wet weather and ground conditions. Correct labelling is key but this seems more difficult for ruminants than for eggs (free range and barn eggs).

Should government set further standards to ensure greater consistency and understanding of welfare information at the point of purchase?

- Many schemes exist already - with sufficient labelling it should be for the consumer to decide.

What type of action do you feel is most likely to have the biggest impact on improving animal health on farms?

- Investment and profitability.
- Investment in new buildings would have the greatest impact and it would be a win for the environment as well as there would be reduced ammonia emissions and reduced water pollution risks.
- Disease eradication schemes such as BVD, Johnes and especially bovine TB - incentives for the industry to drive the process forward but with legislation to make the late adopters conform.

How can the government best support industry to develop an ambitious plan to tackle endemic diseases and drive up animal health standards?

- Incentives for the industry to drive disease eradication schemes but with legislation to make the slow adopters conform.
- The Government has to be strategic and step in where the industry is failing to act. However the preferred option is to give the industry the tools and let them get on with it e.g. bovine TB. However any tools provided need to be based on sound science which can be shared and understood by others.

9. Supporting rural communities & remote farming

Consultation questions

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

There are a number of challenges facing rural communities and businesses. Please rank your top three options by order of importance:

- a) Broadband coverage
- b) Mobile phone coverage
- c) Access to finance
- d) Affordable housing
- e) Availability of suitable business accommodation
- f) Access to skilled labour
- g) Transport connectivity
- h) Other, please specify

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?

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

- We support the direction of travel indicated by the consultation and in particular that financial support is at the heart of a healthy rural economy in national parks and other upland areas.
- If the agricultural transition is managed poorly and future environmental land management schemes are not sufficiently attractive, rural poverty could increase and these communities lost.
- Supporting farming, land management and rural communities in the uplands should continue without a break. The Environment Plan provides a clear direction of travel - public money for public goods - and support through a transition period will be needed so that farming and land management businesses will be able to adapt their business model.
- For the uplands local knowledge and experience through groups such as the Peak District Land Managers Forum will be able to support the development of a future policy and support system which is sufficiently flexible at a local level to accommodate the rich diversity of such special landscapes.
- Agricultural incomes in upland areas have been declining and many farms are considered to be non-economic in that their income from agriculture is often negative without direct support from the Government. This is often true for even the best performing farms.
- Defra should consider the variability in the uplands- the economic incentives needed in some areas to effect positive change may be greater than others. For example, dairy farming is a major land use in the Peak District and experience to date after decades of agri-environment schemes is that the incentives that have been provided are not enough to incentivise many people to move towards greater environmental outcomes.
- Farmers and land managers in these areas continue to shape England's most iconic landscapes, heritage and environment. It is therefore important that these land managers are retained, even if their holdings are small and their activities and approach change somewhat i.e. to produce food and a full range of public goods.

- Future environmental schemes have the potential to make an important contribution to businesses but there may be a need to give more explicit consideration to the incomes of upland land managers, recognising the risks of land abandonment and rural depopulation if these farm units are unprofitable.
- A system where high management conditions are required in return for a level of support that ensures these land managers can continue to serve the communities and environment whilst also producing high quality food. This requires more than income forgone. If your income is negligible, income forgone is not much of an incentive.
- Whilst there is some scope for further woodland creation trees need to be planted in the right place and not where there are other priority interests.
- In upland areas traditional estates often consist of large areas for example in the Peak District estate size varies from 200 ha to 7,500 ha. As such they are well placed to work together with their tenants and/or adjoining land managers to deliver at a landscape scale particularly for habitats, carbon management, flood management, clean water, public access and recreation.
- Grouse moor management is a traditional form of land management and enormous changes are already being asked of these land managers in terms of management techniques and desired outcomes. Support is required to help these businesses move through this transition period
- Some members of the Forum, but not all have suggested that Defra should also consider how an ELM system could support a natural processes led approach to management in the uplands. There are some great examples of this being tried both in the UK and abroad but not particularly in the English uplands. A move to a more natural upland environment in places could bring great benefits. However there is great concern about the possibility of rewilding and one of the issues is that the term rewilding means different things to different people and this involves a wide range of understanding. Any exploration of this approach should be around natural processes/naturally functioning habitats not rewilding.
- A further new approach would be applying agricultural, ecological and plant science to the creation of new swards and habitats that can deliver environmental gain whilst still providing nutritious forage and be important parts of grazing regimes for stock e.g. pollinator swards.
- For farming and land management businesses to be sustainable they need: -
 - to be efficient, resilient (diversified) and profitable
 - grants such as Leader and Countryside Productivity should continue without a break in the offer
 - these grants need further improvements e.g. integration with the proposed Environmental Land Management Scheme, simplification of the application process/requirements/evidence, making sure that small scale grants are available as evidenced by the recent small scale productivity grant success
 - more of the grants offered via a standard cost approach for regularly used items
 - the grants offered to have a local level of influence in terms of which work items are appropriate for the area and therefore eligible
- Availability of local experienced and trusted advisers will be an important factor to ensure that farmers and land managers can access and benefit from the future support schemes with resulting benefits for the wider rural community.

Key challenges facing rural communities and businesses

- The three most significant challenges for remote areas are:-
 - Delivering and selling the story of the full range of public goods this type of special landscape delivers so that there is consistent and continuing support.
 - Telecommunications (both fixed and mobile broadband).
 - Affordable housing - is a key requirement for supporting local communities, effective business development and bringing new skills and labour into the countryside.
- Other challenges –
 - mobile telephone network coverage across the upland landscapes
 - poor rural transport
 - high costs of accessing markets
 - effective planning which protects and enhances the landscape whilst enabling rural businesses to develop and ensure their long-term viability through sustainable development
 - rural crime
 - business viability
 - aging population

With reference to the above what should the government do to address the issues identified post Brexit

- An appropriate level of funding support for the rural areas needs to be allocated and ring fenced so that for example the farmers and land managers in upland National Parks such as the Peak District National Park know that the funding is available and that the Government is committed in the longer term.
- Since the early 1970's the uplands have always had extra support, with the expiry of UELS agreements any extra support has gone. The claim that it was put back in by equalising non-moorland SDA BPS payments with non-SDA land BPS payments, is incorrect, it just corrected an unfairness of the SPS regional system introduced in 2005. Admittedly the moorland received an uplift in BPS payments but it has to be remembered that 60% of all SDA farms have no moorland at all.
- In 2015 an estimated £30 Million was coming into the Peak District National Park through BPS, agri-environment and the rural development grants. This amount will need to be significantly increased – doubled - if the farmers and land managers are to be properly rewarded and incentivised to participate in the new scheme and to deliver a greater amount and increased range of public goods from the Peak District - .

10. Changing regulatory culture

Consultation questions

How can we improve inspections for environmental, animal health and welfare standards? Please indicate any of your preferred options below.

- a) Greater use of risk-based targeting
- b) Greater use of earned recognition, for instance for membership of assurance schemes
- c) Increased remote sensing
- d) Increased options for self-reporting
- e) Better data sharing amongst government agencies
- f) Other (please specify)

Which parts of the regulatory baseline could be improved, and how?

How can we deliver a more targeted and proportionate enforcement system?

Changing regulatory culture.

- Integration, reducing burden on scheme participants and more proportionate penalties are to be welcomed.
- Earned recognition, for example as provided by assurance schemes, must be a part of a future scheme and multiple inspections of the same things needs to be removed.
- Enforcement and advice need to work together hand in hand. There should be the option to seek advice and openly report where honest mistakes have been made without risk of disproportionate payment penalties being imposed and with remedial advice being offered.
- Inspections should be less paper based and more in line with what is actually being carried out on the ground.
- There are risks with moving to remote sensing in this regard as well. The key thing is that regulation and compliance arrangements, which are obviously important in giving the public VFM, recognise that farming/land management and the needs of species and habitats, for example, are not black and white nor rigid nor completely understood. How regulation deals with shades of grey and ambiguity, holding onto the big picture rather than obsessing with minutiae will be critical to a collaborative and successful way forward.
- Greater targeting of inspections on a risk basis should be encouraged.

Regulatory baseline

- The presence of a regulatory baseline is to be expected just as any business has to comply with.
- The lack of current co-ordination and the complexity of the system causes issues for land managers and needs to be simplified.
- Future changes must be consulted on separately and with adequate time for the industry to respond.

Targeted a proportionate enforcement system

- The move to a more targeted risk based inspection scheme is to be encouraged.

- A reduction in the minimum inspection rate should be considered.
- Flexibility for increasing and decreasing levels of inspection requirements based on data highlighting high levels or low levels of compliance would enable better use of resources .

11. Risk management & resilience

Consultation questions

What factors most affect farm businesses' decisions on whether to buy agricultural insurance? Please rank your top three options by order of importance:

- Desire to protect themselves from general risks (e.g. – revenue protection)
- Desire to protect themselves from specific risks (e.g. – flooding, pests or disease)
- Provision of government compensation for some risks
- Cost of insurance
- Complexity and administrative burden of insurance
- Availability of relevant insurance products
- Other (please specify)

What additional skills, data and tools would help better manage volatility in agricultural production and revenues for (a) farm businesses and (b) insurance providers?

How can current arrangements for managing market crises and providing crisis support be improved?

What factors most affect farm businesses' decisions on whether to buy agricultural insurance?

- Will the occurrence threaten or have a large impact on the business? If yes and the insurance premium is at the right price there is uptake.
- In an upland grazing livestock area such as the Peak District the risk of animal disease is a core risk problem and farmers need adequate protection from this risk.

What additional skills, data and tools would help better manage volatility in agricultural production and revenues for (a) farm businesses and (b) insurance providers?

- Accurate, timely data from all parts of the supply chain.
- Currently milk processors and abattoirs only voluntarily supply data.
- It is unlikely that insurance companies will provide insurance to cover volatility; this would have to be Government co-ordinated if the Government is going to move away from direct farm payments which have provided to cope with market and weather related shocks.
- Facilitating more co-operative working between groups of farmers e.g. to provide better guaranteed supply of value added produce delivering a high quality environment in the uplands. There are some great initiatives by individuals but these are often niche and scale a limiting factor.

How can current arrangements for managing market crises and providing crisis support be improved?

- Government will need to establish contingency funds to deal with major disease outbreaks that the EU has previously provided.
- The EU has also intervened when markets have slumped due to external factors beyond the industries control, such as the ban on export of dairy products to Russia.
- Government should take responsibility for affects caused by political decisions. Agriculture is different to most industries as the productive cycle is so long and so the tap cannot be turned on or off at a whim.

12. Protecting crop, tree, plant & bee health

Consultation questions

Where there are insufficient commercial drivers, how far do you agree or disagree that government should play a role in supporting:

- a) Industry, woodland owners and others to respond collaboratively and swiftly to outbreaks of priority pests and diseases in trees?
- b) Landscape recovery following pest and disease outbreaks, and the development of more resilient trees?
- c) The development of a bio-secure supply chain across the forestry, horticulture and beekeeping sectors?

Where there are insufficient commercial drivers, what role should government play in:

- a) Supporting industry, woodland owners and others to respond collaboratively and swiftly to outbreaks of priority pests and diseases in trees?
- b) Promoting landscape recovery following pest and disease outbreaks, and the development of more resilient trees?

What support, if any, can the government offer to promote the development of a bio-secure supply chain across the forestry, horticulture and beekeeping sectors?

Protecting crop, tree, plant and bee health

- Pest and diseases affect not only individual producers but the countries food and timber stocks. The government and its relevant agencies should co-ordinate and lead national responses to pest and disease outbreaks. This needs to be undertaken with co-operation from and in partnership with the private sector.
- The government should be actively leading a collaborative approach to respond to pest and disease outbreaks and to promote landscape recovery once these outbreaks have been stopped.
- Ash dieback is an example of where a new environmental land management scheme could link with Heritage Lottery funding to enable a landscape scale approach to mitigate the damage to the landscape before the full negative impacts are felt with a potential consequent impact on the local economy.
- Developing incentives to support the lifecycles of pollinators and invertebrates generally will be an important component of any future support scheme given the declines we have seen in bee populations and the more recent recognition that insects in general may be in serious decline.

Where there are insufficient commercial drivers, how far do you agree or disagree that government should play a role in supporting: a) industry, woodland owners and others to respond collaboratively and swiftly to outbreaks of priority pests and diseases in trees? b) landscape recovery following pest and disease outbreaks, and the development of more resilient trees? c) the development of a bio-secure supply chain across the forestry, horticulture and beekeeping sectors?

- There is support for all of the above – it is essential Government plays a co-ordinating role. Post Brexit the Government has to ensure there are stringent phytosanitary controls in place. As an island nation we should be able to have a health status advantage over main land Europe.
- Government intervention in development of resilient trees will be required where there is insufficient market incentive, however if legislation demands locally grown stock the market will rise to the challenge.
- Where major change is likely out with the control of land managers Government should be prepared to support both the response and landscape recovery. A current example that could be used to trial a way forward is ash dieback. Widely expected to devastate the ash tree population in the UK there will be a need to seek to recover the landscape of woods, hedges, copses and isolated trees and also to respond to the health and safety implications. The latter include dead and decaying trees that may need management or felling near roads, footpaths etc. The scale of this may be out with the costs of normal tree management for such purposes.

Where there are insufficient commercial drivers, what role should government play in: a) supporting industry, woodland owners and others to respond collaboratively and swiftly to outbreaks of priority pests and diseases in trees? b) promoting landscape recovery following pest and disease outbreaks, and the development of more resilient trees?

See answers above

What support, if any, can the government offer to promote the development of a bio-secure supply chain across the forestry, horticulture and beekeeping sectors?

See answers above.

13. Ensuring fairness in the supply chain

Consultation questions

How can we improve transparency and relationships across the food supply chain? Please rank your top three options by order of importance:

- a) Promoting Producer Organisations and other formal structures?
- b) Introducing statutory codes of conduct?
- c) Improving the provision of data on volumes, stocks and prices etc.?
- d) Other (please specify)?

What are the biggest barriers to collaboration amongst farmers?

What are the most important benefits that collaboration between farmers and other parts of the supply chain can bring? How could government help to enable this?

What are the priority measures for improving transparency and relationships across the food supply chain?

- Full & open data supply by processors & abattoirs so that accurate market intelligence can be given to farmers.
- The powers of the Grocery Code Adjudicator (GCA) needs extending to cover supervision of Voluntary Codes.

What are the biggest barriers to collaboration amongst farmers?

- Past co-operative failures have left farmers scarred. In the dairy sector in the Peak District the largest dairy co-operative Arla collects from a significant number of farms. There is no prospect of more co-operatives in the dairy sector.
- Buying groups exist and there is a range of discussion groups to aid with knowledge transfer.
- Collaboration has to happen from the bottom up, top down initiatives have a history of failure.
- Collaboration amongst farmers is essential in terms of animal disease but sharing information about disease can be a barrier in terms of perception.
- Livestock markets and the use of machinery contractors are a form of collaboration: -
 - The markets pool livestock so that buyers can select livestock that suit their specification.
 - Machinery contractors maximise the use of machinery and can make it cheaper than purchasing machinery.

What are the most important benefits that collaboration between farmers and other parts of the supply chain can bring? How could government help to enable this?

- There is increased collaboration between producers and processors and some are working well. The greatest benefit is where forward contracts are being offered – such as a guaranteed price for 2 years. The government can best help by enabling market transparency – the less opaque markets are the more likely it is processors offer longer contracts.
- Facilitating more co-operative working between groups of farmers e.g. to provide better guaranteed supply of value added produce delivering a high quality environment in the uplands. There are some great initiatives by individuals but often scale is a limiting factor.

14. Devolution – maintaining cohesion & flexibility

Consultation questions

With reference to the principles set out by JMC(EN) above, what are the agriculture and land management policy areas where a common approach across the UK is necessary?

What are the likely impacts on cross-border farms if each administration can tailor its own agriculture and land management policy?

- The Peak District National Park is based solely in England so is not directly affected by devolution and cross boarder issues.
- A common approach needs to be taken in a number of areas including agrochemical approval, labelling, GMOs, welfare standards and support systems.
- It needs to be ensured that the whole of the UK has a coherent policy with no region seeking to undermine another or provide an unfair advantage.
- Internal market barriers and distortions need to be prevented.

15. International trade

Consultation questions

How far do you agree or disagree with the broad priorities set out in the trade chapter?

How can government and industry work together to open up new markets?

How can we best protect and promote our brand, remaining global leaders in environmental protection, food safety, and in standards of production and animal welfare?

How far do you agree or disagree with the broad priorities set out above?

- Free trade deals will be essential particularly for the sheep sector which relies on exporting 40% of its product.
- EU tariffs currently provide substantial protection to beef producers. In the absence of these tariffs then imported beef would be a lot cheaper, which has clear implications for domestic producers. This has some direct relevance to the rural economy of upland areas.

How can government and industry work together to open up new markets?

- By Government working with AHDB and companies that have export experience, so using existing knowledge.
- Government needs to build up its export advice service, UKTI, with specific advice for agricultural and food products.

How can Government best protect and promote our brand, remaining global leaders in environmental protection, food safety, and in standards of production and animal welfare?

- By backing Red Tractor Standards and building on that and not starting a new one.
- Red tractor needs to be used as the main mechanism for keeping out imports produced to inferior standards.
- If WTO rules mean we have to accept them then import tariffs must be used. Clear country of origin labelling is essential.

16. Legislation – agriculture bill

Consultation questions

How far do you agree with the proposed powers of the Agriculture Bill?

What other measures might we need in the Agriculture Bill to achieve our objectives?

- The list of powers appears sensible but is not detailed enough to allow for detailed comment.
- The key needs are for powers that enable: -
 - the continuation of the current schemes during transition,
 - powers to run the tests, trials and pilots,
 - the introduction of the new substantive domestic environmental land management scheme
 - a regulatory framework to ensure that there is no environmental damage due to Brexit and the removal of cross compliance e.g. whilst the Hedgerow Regulations protect hedges current cross compliance is the only current form of protection for dry stone walls. Once this finishes there will be no protection for walls. However a universal scheme, including the retention of walls that all farmers and land managers buy into is preferred to the introduction of further legislation. It is recognised that if this approach is taken then there would need to be a mechanism to ensure that walls were not taken out between schemes.
 - The polluter pays principle should only be introduced gradually so that the farming and land management businesses have time to adjust and adapt their business model
 - provision to recognise devolution requirements.
- There should be provision for the extension of current Environmental Stewardship Schemes rather than the transfer into Countryside Stewardship. As long as this was done with the provision for a light touch review and additional capital works then this could provide part of the solution for the transition period.

Peak District Land Managers' Forum

7 May 2018.