

CPRE response to Government Consultation ‘Health and Harmony: the future for food, farming and the environment in a Green Brexit’

The Campaign to Protect Rural England (CPRE) campaigns for a beautiful and living countryside. We work to protect, promote and enhance our towns and countryside to make them better places to live, work and enjoy, and to ensure the countryside is protected for now and future generations.

CPRE is a member of Wildlife and Countryside Link, Sustain and the Rural Coalition and supports their responses to this consultation. This response addresses the issues of most relevance to CPRE.

Summary of key points:

The new agricultural policy should contribute to a beautiful and living countryside that is valued and enjoyed by everyone. It should encourage the production of high quality British produce from a diverse, and therefore resilient, farming system. As such, CPRE welcome this consultation, in particular the commitments to reversing environmental damage, linking public funding to the delivery of public benefits and maintaining high standards in trade agreements. However, **long term public investment in the environment through farming** is vital if we are to deliver the 25 year environment plan. The Government should establish a mechanism in the Agriculture Bill for an independent review of funding need every five years.

Taking the policies above as given, the remaining key issues for CPRE are:

1. A dynamic, innovative farming sector, attractive to new entrants, and contributing to thriving rural communities can be achieved by **reversing the dramatic loss of farms, mainly smaller farms**, over recent decades¹. Tailored support should be offered to ensure smaller farms make the most of the new policy, to develop sustainable businesses.

¹ England has lost the greatest percentage of farms compared to other EU countries. This is disproportionately due to the decline of small farms; with farms less than 20ha falling by 33.5%; farms between 20-50ha by 22%; between 50-100ha by 11.6% and between 100-200ha by 7.3% over the course of just ten years (2005-2015). (Uncertain Harvest, CPRE, 2017)

2. The opportunity to **reverse the decline of our beautiful landscapes** which people care about so much², must be taken. Landscapes everywhere (not just in the uplands) must be enhanced through agricultural policy, particularly those **around urban areas** where most people live. It cannot be assumed that the effect of other environmental actions, even if taken at the landscape-scale, will *automatically* result in enhanced landscapes. But by targeting support to determine *where* specific actions are taken in the landscape, multiple benefits can be delivered. The tools to do this are already available.
3. Stronger policies are needed across Government to **recognise the natural capital value and benefits of all agricultural soils**, to protect soil quality from degradation by poor management and soil sealing by development. Greater ambition and innovation to improve soil health is necessary.

High quality, government-funded **advice** to help farmers develop environmentally sustainable businesses will be vital to help address these issues and help farmers make the most of the opportunities the new policy will offer. This in turn will require investment to restore the provision of agricultural education, research and training.

Environmental improvement can only be delivered if farms are viable businesses, able to innovate and adapt. But these are not two separate objectives - truly sustainable businesses are based on protecting a healthy environment on which they depend. The new agricultural policy must help foster the profitability of farms and enhancement of the natural environment in an integrated way. We encourage the Government to make the most of this period to **innovate and pilot** new approaches to delivering positive outcomes. This should include trialling support for **whole farm approaches** which fully integrate environmental objectives with production.

Section 2: Reform within the CAP

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? (p.19)

We agree that delivery of Countryside Stewardship (CS) needs improvement. A balance must be struck between simplicity and ensuring that the scheme is attractive to farmers and compatible with farm businesses, and the recognition that there are some demanding and complex outcomes that need to be achieved on farmland (and not just in Sites of Special Scientific Interest). Ways of doing this include:

1. Ensuring high service standards at the Rural Payments Agency to restore trust in the scheme and cut costs to farmers.
2. Offering all year round or quarterly application windows which would even work flow.
3. Offering more expert technical advice. The more advice and capacity there is to support applicants, the better the schemes will perform. It is essential that Natural England or

² 59% of people, the largest group, responded to the DCMS Taking Part survey (2014-15) saying that the British Countryside and Scenery was what made them most proud of Britain.

other bodies such as the Farming and Wildlife Advisory Group have the resources and capacity to deliver this.

4. A change in the culture of controls and inspections, with effort made to understand problems and find solutions as well as assessing compliance.
5. Giving land owners and managers a stronger feeling of ownership and responsibility for developing solutions, for example through greater local flexibility in prescriptions. This will also produce better outcomes.
6. Doing more to inform the public about improvements to access to the countryside that have been funded by CS.
7. Further roll out of facilitation funding to build and engage farmer groups to collaborate over the wider landscape for environmental improvement under CS, including funding farmers to collaborate in the preparatory stages, such as to attend meetings or for travel costs.
8. Working with commercially successful farmers who demonstrate good environmental practice and outcomes under the scheme, to actively promote CS and its benefits. Defra should support them to act as demonstration farms with a programme of open days, and articles in the farming press.

Section 3: An Agricultural Transition

What is the best way of applying reductions to Direct Payments? Please select your preferred option from the following: (p.23.)

- a) Apply progressive reductions, with higher percentage reductions applied to amounts in higher payment bands (*please provide views on the payment bands and percentage reductions we should apply in further comments below*)
- b) Apply a cap to the largest payments
- c) Other

We support the removal of Direct Payments and replacement with a system of incentivising the provision of public goods. This should be done gradually to give farmers time to adjust. We are unable to advocate a specific option in the absence of any analysis or modelling of the potential impacts of the options and without knowing how different proposals in the consultation document would interact. However, the reduction should follow these principles:

1. There should be no gap in time between the decline in direct payments and the availability of payments for the delivery of public goods. These new payments must be sufficiently attractive to farmers: flexibility within WTO rules should be explored so that payments for environmental public goods fully reflect the value of the benefits delivered.
2. The need to give all businesses certainty on the type and length of transition, phasing changes to give sufficient time to adjust and encourage uptake of environmental land management schemes.

3. Transition should not drive further heavy loss of small to medium sized farms³. While we accept some restructuring is likely, it is important that the transition does not put in place systems of support that favour larger farms over other sizes. Rather, Government should recognize that smaller to medium-sized farms may need longer to adjust or need additional support during the transition.
4. Consideration should be given to applying a different model to uplands and common land, and areas where there are greater numbers of smaller farms, particularly with grazing livestock, such as the Blackmore Vale in Dorset. The different model should reflect the greater need for support, time for adjustment and the dependence of these landscapes on the nature and health of farming.

Defra should assess the impacts of different models of financial transition including the impact on farm size diversity.

What conditions should be attached to Direct Payments during the 'agricultural transition'? Please select your preferred options from the following: (p.23)

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

Option B is preferable. It is important that cross compliance rules are retained during transition. However, action is needed to make the system more effective and proportionate, and accepted as such by land managers. Enforcement action should be accompanied by advice to demonstrate why non-compliance is a problem and to identify how to improve the situation.

Without further information, CPRE does not support option C. It is unclear how this could be achieved equitably. If the current principle linking direct payments to cross compliance is broken then some farmers would still face financial penalty while farmers who had newly taken over land would not. It is also unclear what this policy is intended to achieve - would it be targeted? How would it affect rural culture, economies and the environment? Further detail, analysis and modelling of any such policy would be needed before a view could be taken.

What are the factors that should drive the profile for reducing Direct Payments during the 'agricultural transition'? (p.23)

Please see our comments under 'What is the best way of applying reductions to Direct Payments?'

³ England has lost the greatest percentage of farms compared to other EU countries. This is disproportionately due to the decline of small farms; with farms less than 20ha falling by 33.5%; farms between 20-50ha by 22%; between 50-100ha by 11.6% and between 100-200ha by 7.3% over the course of just ten years (2005-2015). (Uncertain Harvest, CPRE, 2017)

How long should the 'agricultural transition' period be? (p.23)

We envisage a transition period of about 5 years. CPRE signed up to the Wildlife and Countryside Link policy briefing, 'A Future Sustainable Farming and Land Management Policy for England' (2017), which suggests three phases:

- 2020 to 2021: redeployment of the 30% greening payments to new environmental schemes; begin phase out of direct payments in 2021;
- 2022 to 2025: introduction of new policy and end of transition away from direct payments;
- 2025 onwards: transition to new policy complete for all land managers.

We continue to support this broad time frame as reasonable but with the proviso that the Government should:

- evaluate the foreseeable consequences for a range of farm types and sizes;
- consider adjusting transition for some sectors or areas such as smaller-scale upland and lowland livestock farms. They may need longer because of their dependence on direct payments. Loss of small and medium sized farm businesses would damage the countryside.
- consider wider issues and impacts of market adjustments including implications of trade settlements negotiated post-Brexit on viability of farm sectors and regions, and adjust transition arrangements accordingly;
- pilot ambitious and innovative schemes during this period such as outcome-based schemes and whole farm approaches; and
- appreciate that the positive changes in farming and the natural environment will take time to be fully realised. For this reason it is vital that an ambitious broad purpose is set through the Agricultural Bill, giving clarity to farmers on the long-term policy objectives (see responses to Agriculture Bill questions below).

Section 4: A successful future for farming

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: (p.26)

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

CPRE advocates approaches which are practitioner-led, recognize existing expertise within the farming sector and encourage farmer to farmer learning, field schools and mentoring. We support options (c), (d) and (a), on the assumption that 'better access' means improved funding for skills training and greater outreach to land managers not currently undergoing training and skills development. This is especially the case for businesses that are under-resourced and cannot release staff without paid replacement. Evidence shows farmers on smaller farms are more likely to be overworked and under-resourced and so find it harder to seek advice, learn new skills, develop their business and find out about support programmes⁴. This might mean funded attendance at courses or support for expenses and/or lost income are needed to ensure equitable access to training for businesses of all sizes. The option to tie any of these approaches into funding mechanisms should be explored.

We believe increased advisory capacity should be put in place to support farmers in developing sustainable business plans which integrate environmental management into their business model. The loss of free, impartial advisory services provided in the past was significant for smaller, financially fragile businesses unable to afford the commercial advice that their larger counterparts, in receipt of larger public payments, could access. An enhanced advisory capacity is urgently needed.

What are the most effective ways to support new entrants and encourage more young people into a career in farming and land management? (p.26)

We would support a package of measures to support new entrants to farming and progression within the industry. These include:

- Improving access to land through tenancy reform and reinvigorating the county farm estates as incubator farms with funding to support capital investment if required.
- Provision of grants or loan packages designed for smaller scale businesses including start-ups i.e. they are low-level, accessible and simple to administer for businesses with limited administration capacity;
- Funded delivery of affordable training, advisory services targeted for farm entrants and farmer-to-farmer mentoring to provide a coherent joined up service for smaller farms and start-ups;
- Support greater engagement of the public in food production through the development of community supported and oriented farms near and around towns and cities. This would increase opportunities for meaningful engagement with food production as well as processing, marketing and retail experience for urban communities.
- An increase in availability of farm apprenticeships to encourage more young farm entrants from a range of backgrounds.
- Investment to restore the education and research potential of universities, colleges and research institutes. Successful training programmes, whether for farm apprenticeship schemes or graduates, must be supported by appropriately trained and experienced

⁴ CPRE, *Uncertain Harvest: does the loss of small farms matter?*, 2017, p13

personnel. This will be particularly important following Brexit if the UK is to compete with Continental Europe where agricultural education, research and training has not been curtailed to the same degree as in the UK.

Section 5: Public money for public goods

Which of the environmental outcomes listed below do you consider to be the most important public goods that government should support? (p.35)

- 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

We support funding being reallocated predominately to support environmental public goods and deliver the environmental improvements that are urgently needed.

CPRE believes the **enhancement of the landscape is the most important public good** that the Government should support. The English landscape has been simplified and homogenised over the last 70 years. For example, 7,250 km of hedgerows were lost *each year* between 1945 and 1970⁵; less than half of the surviving managed hedges in Britain are classified as in ‘good structural condition’⁶; 95% of flower rich meadows were lost between 1945 and 1993; and overall, between only 1990 and 2004, 60% of the English landscape has changed in ways which are ‘inconsistent’ with its traditional character⁷. This trend must be reversed.

All the goods listed above are vitally important to well-being and our response to climate change (as is water quantity i.e. flooding, land drainage and drought, which is missing from the list). However, we need to maximise the benefits we get from individual actions rather than rely on single benefit approaches. This can be done using a landscape approach to deliver any scheme: synergies can be delivered by working with the grain of the landscape and reflecting local landscape character. For example, re-creating wildflower meadows on steeper slopes can prevent soil erosion, store soil carbon, and support pollinators, natural predators of cereal pests and ground nesting birds, as well as enhancing the landscape. Natural England’s National Character Areas (NCA) Profiles, which together cover the whole of England, provide an established spatial framework for targeting spending to support environmental outcomes. Each Profile defines an area of common landscape character and identifies specific opportunities for environmental improvement that enhance the landscape

⁵ Williamson, T., *Living Landscapes: Hedges and Walls*, 1999, p64.

⁶ Hedgelink, *About hedgerows: the importance of hedgerows*, 2008.

⁷ Haines-Young, R., Martin, J., Tantram, D., & Swanwick, C. *Countryside Quality Counts: Constructing an Indicator of Change in Countryside Quality*. 2004. p22.

and bring wider public benefits. These are underpinned by County and District Landscape Character Assessments and, in some places, neighbourhood plans that can also be used.

Therefore, due to:

- the decline in landscape quality;
- a landscape approach being a means of delivering multiple benefits and better value for money;
- the value of landscapes in terms of the economy⁸, well-being, our culture and our national identity; and
- the value that the public place on landscapes⁹;

CPRE believes that the **conservation and enhancement of landscapes must be a core objective** of the new agricultural policy across England (landscapes everywhere are of value). As a signatory to the European Landscape Convention the UK should take landscape into account in all policies that might have a landscape impact. It cannot be assumed that the effect of other environmental actions, even if taken at the landscape-scale, will automatically result in enhanced landscapes. The answer is to deliver integrated approaches that enhance local landscape character and other public goods together.

CPRE welcomes the inclusion of **healthy soil** in the list. The health and quality of soil will be central to securing future agricultural productivity and improvements to the natural environment, including helping to reduce climate change. There are a number of soil issues which need more emphasis and where we urge the Government to be more ambitious:

1. **Government policies on agriculture and planning must be consistent in protecting the quantity of land where soil quality is high.** In the consultation document, soil quality isn't clearly differentiated from soil health. Well-managed soils will improve in depth and fertility but soil quality is largely an inherent characteristic of certain soil types and other geographical factors including aspect, slope and climate. Under the Agricultural Land Classification (ALC) only grade 1 and 2 soils are capable of producing consistent and high yields of important but more demanding crops at field scale such as salads, winter harvested vegetables and root crops. Such soils are relatively scarce at around 21% of all farmland soils¹⁰. These soils are therefore highly important to food supply and should be protected as an irreplaceable and strategically important national resource. Yet higher grade land (especially ALC grades 1 and 2) is being allocated and lost to development - permanently removing it as a productive resource. The average rate of loss of agricultural land is at its highest level in decades, at over 10,500ha on

⁸ There were 1.35 billion visits to the English countryside in 2015-16 (Natural England. *Monitor of Engagement with the Natural Environment headline report: March 2015-Feb 2016*. 2017)

⁹ 59% of people, the largest group, responded to the DCMS Taking Part survey (2014-15) saying that the British Countryside and Scenery was what made them most proud of Britain.

¹⁰ DEFRA, *Defra Soil Research Programme: Review of the weight that should be given to the protection of best and most versatile (BMV) land*. 2011 p. 9.

average per annum, and three times the rate of loss in the 2000s¹¹. This is despite a degree of protection in the National Planning Policy Framework's protection of best and most versatile land. Policies need to be improved and joined up to stop this loss.

2. **Government targets on soil health need to be clearer and more ambitious.** The evidence document which supports this consultation refers to a commitment in the 25 Year Environment Plan for England "That all soils will be managed sustainably by 2050"¹². The 2050 date does not match that of the 25 Year Plan which states: 'by 2030 we want all of England's soils to be managed sustainably'¹³. The inconsistency here is either an unfortunate error or it indicates that the 'commitment' in the 25 Year Plan is more an aspiration rather than a firm target. In any case we are disappointed that this ambition merely repeats that set out in Defra's 2009 Soil Strategy. Government has also been consulting on a revised draft text for the National Planning Policy Framework (NPPF). We welcome recognition in this of the natural capital benefits of agricultural land, but believe it should be strengthened to correspond with the value Defra places on agricultural land¹⁴. Land use planning is one of a set of important tools for natural capital protection and, as the 25 Year Plan makes clear, the Government intends to 'set gold standards in protecting and growing natural capital'¹⁵. However, the draft NPPF refers specifically to best and most versatile agricultural land only but is cautious on recognising the wider natural capital benefits of other agricultural land or undeveloped land generally¹⁶. We therefore urge the Government to: be clear on what its target is and for what date; and to remedy the weaknesses of the 25 Year Plan with stronger policies in agricultural and planning policy to protect the quality and maintain the health of farmed soils.
3. The consultation document has a **number of gaps in its analysis of soil** that need to be built into future agricultural policy. These include the importance of soil organic matter, the role of soil biodiversity, the potential for carbon sequestration in all farmed soils, the potential role of agroforestry in soil protection, the value of reintroduction of livestock to arable only farms and mixed farming, and the urgency of reducing current dependency on nitrate fertilisers through an agro-ecological approach and the development of 'affordable low carbon fertiliser products to reduce and replace fertilisers', as set out in the Clean Growth Strategy¹⁷. These are all approaches that, if

¹¹ CPRE analysis of Government Land Use Change statistics pre and post 2013;

<https://www.gov.uk/government/statistical-data-sets/live-tables-on-land-use-change-statistics>

¹² Defra / Government Statistical Service, *The Future Farming and Environment Evidence Compendium*, February 2018, p57

¹³ HM Government, *A Green Future: Our 25 Year Plan to Improve the Environment*, 2018, p27

¹⁴ Ministry of Housing, Communities and Local Government, *National Planning Policy Framework - Draft text for consultation*, March 2018, p48. Section 15: Conserving and enhancing the natural environment Paragraph 168a and 168b

¹⁵ HM Government, *A Green Future: Our 25 Year Plan to Improve the Environment*, 2018, p9

¹⁶ Ministry of Housing, Communities and Local Government 2018. Draft NPPF, p.34, paragraph 118b

¹⁷ HM Government, *The Clean Growth Strategy - Leading the way to a low carbon future*, April 2018 (revised version) p.110

appropriately undertaken, could also help enhance local landscape character by creating a greater emphasis on mixed farming and a greater diversity of cropping.

Of the other options listed below, which do you consider to be the most important public goods that government should support? (p.35)

- 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.

CPRE believe that “e) Preserving rural resilience and traditional farming and landscapes in the uplands.” and “f) Public access to the countryside” are priorities for support.

However, we believe all these public goods can and should be supported, with the exception of productivity and competitiveness, which are not public goods as they are rewarded by the market. However, a productive farming sector is vital to the delivery of many of the other public goods. In turn, many of these public goods can contribute to improved productivity and enhance competitiveness.

Preserving rural resilience and traditional farming and landscapes is a priority for CPRE. However, we do not believe it should be restricted to the uplands, but should be a priority across the country. This can be achieved through:

1. Creating a dynamic, innovative farming sector, attractive to new entrants, and contributing to thriving rural communities by **reversing the dramatic loss of farm numbers over recent decades**¹⁸. Having a range of farm sizes and types is vital to ensure a thriving farming and rural industry, available and attractive to new entrants, progressing farmers and producing a healthy countryside¹⁹.
2. **Protecting and enhancing England’s beautiful landscapes**. See answer to question above. It is important that landscapes everywhere (not just in the uplands) are enhanced, particularly those **around urban areas** where most people live. Tree planting (where it is consistent with local landscape character), including through agro-forestry, is just one way of achieving this. In the uplands, common land will need tailored support to retain the significant public benefits it delivers.

Public access to the countryside is a public good which CPRE also strongly supports. Improving the green space around towns, and access to it, would offer good value for money due to the large numbers of people who would benefit from it²⁰. Maintaining and enhancing

¹⁸ Over one fifth (21.3%) of agricultural commercial holdings have been lost in only ten years, between 2005 and 2015 (June Survey, Defra, 2016, analysed in *Uncertain Harvest*, CPRE, 2017, p.8.)

¹⁹ Sustain, *The need for specific support for maintaining a diverse farm structure in new English agriculture policy*, 2018.

²⁰Helm, D. *In defence of the Green Belt*. 2015. New College, Oxford

access via existing public rights of way would be a substantial public benefit, along with targeted options to add to the network.

Farming in the urban fringe has been shown to be important both in terms of (i) providing fresh produce close to mass markets and (ii) being able to provide a range of wider public policy benefits in areas such as education and health, in close proximity to people who could make particular use of these benefits²¹. In the light of this, Green Belt policy is vital in providing a stable long-term policy environment for the sustenance of farming in the urban fringe next to our largest towns and cities.

Section 6: Enhancing our environment

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: (p.42)

- a) Recreation
- b) Water quality
- c) Flood mitigation
- d) Habitat restoration
- e) Species recovery
- f) Soil quality
- g) Cultural heritage
- h) Carbon sequestration and greenhouse gas reduction
- i) Air quality
- j) Woodlands and forestry
- k) Other (please specify)

All of these outcomes (and water quantity i.e. flooding and drought, which is missing from the list) would be delivered most effectively at a large-scale. However, delivering objectives at a large or landscape scale should not be confused with enhancing the landscape which should be an objective in its own right. Similarly, it cannot be assumed that carrying out other environmental objectives will automatically result in an enhanced landscape. If landscape enhancement is a distinct objective alongside these others then they can all be delivered in integrated ways which offer the best value for money (see answer to environmental outcomes question in Section 5).

There are many welcome references in the document to landscape. However, they are somewhat confused in that various terms are used - cultural landscapes, historic landscapes, natural landscapes, beauty, and landscapes. It is our view that the term 'landscape' includes all these different elements noted above and many more. Landscapes include both cultural and natural heritage and the new agricultural policy must ensure that landscape character (i.e.

²¹ Making Local Food Work, *Food from the Urban Fringe. Issues and Opportunities*, 2012.

what makes different areas distinctive) is protected and enhanced. In addition to this being an explicit objective of policy this can be achieved by ensuring that:

- **Funding is provided for farm clusters and to support experimental approaches**, such as whole farm schemes, that can make the sector more resilient for the future.
- **The area of land under agri-environment options is very much greater** than at present. The land currently being used to actually deliver options is a very small proportion of agricultural land at the moment.
- There is a **much larger amount of land under more demanding Higher Level Stewardship-type options** - this is where the real landscape gains/enhancements are achieved - supplemented by much wider availability of capital items, such as tree and hedgerow planting, that can combine to achieve attractive functional landscapes that deliver a wide range of other public benefits.
- There is **targeting of agri-environment approaches (guided by the National Character Areas)** not just in designated areas but to address problem areas in the wider landscape and meet area-wide objectives (but no area should be excluded).
- **Delivery is supported by advice and guidance** to land managers to ensure all options are located where they will deliver multiple benefits, including enhancing the landscape.
- **Retention and management of key landscape features is a requirement for funding.**

Although environmental land management schemes can learn from the past, they *must* look forward, addressing the problems of the future, potentially creating new landscapes that nonetheless are in tune with the landscape character of the area. Collaborative schemes would need to follow pre-agreed master/management plans developed at a local scale, and should deliver landscape, biodiversity, natural resource protection, and climate change mitigation and adaptation *together*, even if the original trigger for the scheme is only to deliver against one of these objectives. Such schemes would offer opportunities for partnership funding with the private sector through market-based Payments for Ecosystem Services (PES).

What role should outcome based payments have in a new environmental land management system? (p.42)

CPRE favours an approach which gives greater ownership of solutions to farmers and other land managers rather than prescriptive processes which are inflexible and may reduce engagement with the environmental land management scheme (ELMS). We strongly support an outcomes-based approach to payments under the ELMS scheme subject to the provisos set out below:

- We would welcome further trialling to ensure scheme objectives can be effectively delivered.
- The approach should be based on local evidence and monitoring, but sit within a wider spatial unit, such as landscape character types or national character areas to enable local flexibility.
- In designing schemes it is essential that clear objectives and outcomes are identified so that farmers know what it is that society is expecting of the scheme. Farmers should

have the flexibility to determine how to achieve those objectives and outcomes. This might mean farmers coming up with their own plan of action (in collaboration with an adviser) in terms of management.

- A further challenge will be to identify what outcomes need to be delivered in any given context and developing robust methods to measure their achievement. Where identifying specific outcomes (e.g. carbon storage in soils) may be difficult due to, for example, a lack of scientifically agreed metrics or high cost of field testing, then the option to reward application of specific processes to land management should be retained.

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

In National Parks and Areas of Outstanding Natural Beauty, the management authorities could deliver the new environmental land management scheme and help in trialling novel delivery options. However, we support the sub-regional targeting of agri-environment approaches (guided by the National Character Area Profiles) not just in designated areas but to enhance the wider landscape and meet area-wide objectives (which should aim to enhance *all* landscapes).

Natural England's NCA profiles, that define areas of common landscape character at the regional scale, provide an established spatial framework for informing targeted land management decisions. Each contains a Statement of Environmental Opportunity, which identifies the key improvements that are needed to enhance the function of that landscape. Because they reflect underlying geology, NCAs provide logical subdivisions of major catchments and can reflect the different needs across an area. Underneath NCAs are local Landscape Character Assessments (LCA) such as in the Lake District, where the LCA is being developed to detail the condition of the landscape and the forces for change. LCAs include strategies to protect, manage and plan for landscape features that collectively underpin landscape character. Thus, **the major tools for the planning of functional landscapes are already available**. Using a spatial approach based on landscape character would enable local flexibility and responses to local need, but within a wider spatial strategic framework. This would also help inform ongoing monitoring of the outcomes being delivered at a variety of landscape scales.

How can farmers and land managers work together or with third parties to deliver environmental outcomes? (p.42)

There are a range of options for collaborative working both between farmers and land managers and third parties. It is vital that land managers are brought together at the preliminary stage of any schemes so as to secure their subsequent ownership of them. Opportunities include through Community Supported Agriculture models and making links with urban communities and working with organisations such as FWAG (Farming & Wildlife Advisory Groups). Locally-led collaborative initiatives should be supported to design schemes that

address the priorities and needs of that area. These locally-led initiatives often also take a more integrated approach to the support required, identifying not just the environmental priorities for land management but the ancillary supporting structures required (e.g. local abattoirs, other local services).

Section 8: Supporting rural communities and remote farming

How should farming, land management and rural communities continue to be supported to deliver environmental, social and cultural benefits in the uplands? (p.48)

Chapter 8 refers to ‘upland and other remote areas’ but it isn’t clear whether it refers to remote upland areas and remote lowland or upland only. Issues faced by some lowland farmers due to remoteness - such as access to services, distance from abattoirs etc. - must also be addressed if we want to maintain the diversity of farm structures in the future. Some are as ‘disadvantaged’ in terms of economic competitiveness as areas officially recognized as marginal but are rich in natural capital and opportunities to deliver many public benefits. Areas such as Cornwall’s Culm grasslands for instance have a high percentage of land area recognized as of high nature value.

Notwithstanding the above, **CPRE support and would like to be involved in the development of a clear vision for the uplands** which covers the need for wider economic opportunities in these areas, beyond farming. This is the right moment for Defra to move away from the language of ‘disadvantaged’ and ‘severely disadvantaged areas’. Such terms are highly misleading. They focus on natural handicaps which affect agricultural production - such as climate, length of season, and altitude - rather than valuing the contribution such areas already make to protection of natural assets and provision of environmental public goods as well as opportunities for greater environmental benefits in future.

We fully support the continuation of support for the uplands. Such support should recognize the important contribution made to land management and the ensuing public benefit by about 10,000 farm holdings. Farmers are often the most efficient way to get the outcomes sought and upland areas have a strong case for intervention based on delivering public benefit. Even though uplands deliver high levels of ecosystem services, (such as supplying 70% of the nation's drinking water, storing 138 million tonnes of carbon in the upland peatlands and providing 86% of England's open access land) income from farming can be very low and many farmers have received little financial support from funding schemes. Many such areas have high nature value farming systems such as upland hay meadows, which need to be carefully managed to provide habitats for highly valued species and maintain precious landscapes. The continuation of farming where it provides this management is important. As farming is moved from reliance on Direct Payments to funding for environmental public goods we are concerned that payments from agri-environment schemes based on income foregone (in line with a narrow interpretation of WTO rules) may be too low to enable farming to continue. In such areas farms are likely to be much more dependent currently on Direct Payments. As mentioned above, Government should explore what is

possible within the WTO rules to ensure farmers are adequately rewarded for delivery of public goods.

Other schemes within the Rural Development Programme for England apart from agri-environment schemes, including Countryside Productivity and LEADER, have received little attention in the debate around the future of agricultural policy. Support such as this should continue to be provided. Experience in places as diverse as Cumbria and Essex has shown that such schemes have enabled a flexible, bottom up approach to developing projects, funding and revenue and supported flourishing local food and product initiatives. These in turn can improve profitability of farms in sensitive landscapes. Outputs delivered have tended to be large compared to the relatively small scale of financial intervention overall.

There are a number of challenges facing rural communities and businesses. (p.48) 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

CPRE believes all these challenges are important. **Affordable housing provision is vital** if rural communities are to remain diverse and thriving. In relative terms, we have built more houses in the countryside than in cities since the government first published its National Planning Policy Framework in 2012, but they have been much less affordable. MHCLG figures published this year reveal that in over 90% of rural local authorities, average house prices are now more than eight times higher than average incomes. Rural areas have also been disproportionately affected by the decline in council house building. Council house delivery in rural local authorities fell from 33,490 homes in 2009/10 to 5,380 in 2016/17²², while the rate of Right to Buy sales accelerated over the same period. The lack of genuinely affordable homes in rural communities is forcing young people out of places where they grew up and threatening the long-term viability of our villages and market towns.

Transport connectivity is a major concern for rural communities and needs urgent attention from the government. In recent years there has been a marked decline in the accessible provision of key rural amenities such as banks, shops, post offices and pubs. This has come at a time when public transport investment has come under strain, with cuts to bus services in many parts of the country. The social impact on communities is considerable, with increased isolation comes a resulting impact on quality of life and well-being. The policy focus of

²² CPRE, *Homes that rural people can afford to live in*, 2018.

<https://www.cpre.org.uk/magazine/opinion/item/4831-homes-that-rural-people-can-afford-to-live-in>

government on road-building is of little help to those who do not own, cannot afford to own or do not want to drive, a private car. It also results in induced traffic and considerable landscape damage for the sake of little to no local economic gain, as evidenced in CPRE's End of the Road Report.²³

New broadband infrastructure is welcome where it is sensitive to the landscape and avoids damage to natural spaces. This can sometimes be done by fixing new masts to existing buildings (such as churches or farm building roofs) provided that their heritage value is considered and protected.

Under '(h) Other', the provision of food supply chain infrastructure such as abattoirs and cutting units is an issue for rural businesses. CPRE has previously drawn attention to the loss of many smaller local abattoirs since the 1960s. This is an important issue for a range of reasons. These include the impact on live animal transport and welfare, diversity in meat production, animal genetic stock and the role local abattoirs play as vital infrastructure to support locally-sourced meat supply and livestock farming in remoter rural areas.²⁴ A new report from the Sustainable Food Trust - *A Good Life and a Good Death: Re-localising farm animal slaughter* - has highlighted ongoing losses with a third of small abattoirs closed in the past decade leaving just 63 small abattoirs, down from 96 in 2007.

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? (p.48)

To help address the range of challenges the Government should ensure that the Defra guidance on rural proofing is updated to reflect the terms of leaving the EU and associated impacts such as access to trade opportunities²⁵, and ensure Defra can be a stronger champion for the countryside. In the longer term, we recommended the creation of an independent champion for rural communities, with powers to ensure rural issues are adequately addressed across Government.

On the specific issues mentioned above, to increase the provision of affordable housing in rural areas the government must be prepared to take a positive, interventionist approach. It should:

- Act to curb the use of 'viability assessments', which allow developers to protect their profit margins by negotiating down their affordable housing contributions. Our recent 'Viable Villages' report with Shelter found that rural sites on which viability assessments were used saw a 48% drop in affordable housing delivery.
- Compel developers to provide affordable housing contributions even on small sites (the current threshold is 10 homes).

²³ CPRE, *The End of the Road?, Challenging the road-building consensus*, 2017

²⁴ CPRE, *From field to fork: The value of England's local food webs*, 2012, p46

²⁵ DEFRA, *Rural Proofing*, 2017. <https://www.gov.uk/government/publications/rural-proofing>

- Allow rural councils to borrow in order to build, as well as implementing stronger restrictions on Right to Buy sales in rural areas.
- Enforce policies of planning restraint in rural areas. This will help to incentivise landowners to bring forward land at a low price for rural exception sites, which provide affordable homes for local people in perpetuity.

To improve transport connectivity, the government should direct investment into better local public transport, ensuring that rural areas truly have sustainable travel choices for work or leisure. Where positive action has been taken, the evidence of benefits is considerable. The Borders Railway which opened in Southern Scotland in 2015 has had a major impact on the local area. These include encouraging modal shift of 40,000 less car journeys a year, attracting tourists, opening up education institutions to wider catchment areas (one college saw a 74% increase in applications) as well as increasing access to local job markets²⁶.

In moving to a new agricultural policy, with the implications that will have for rural economies, we recommend that Local Enterprise Partnerships (LEPs) and the Defra family work together to (i) develop a stronger rural element within Local Economic and Industrial Strategies; and (ii) deploy greater resources to support rural businesses and economic activities that are sympathetic to the communities and environment in such areas. Forthcoming CPRE research (due to be published in June) highlights areas of possible good practice such as the South West Rural Productivity Commission. But we have also found that LEPs are generally focused on promoting recognised housing growth areas and are insufficiently addressing the needs of remoter rural areas.

Section 14: International Trade

How far do you agree or disagree with the broad priorities set out in the trade chapter? (p.63)

We believe that maintaining high quality, high standards and transparency in the food that we produce, sell domestically and export is vital for maintaining confidence in our food producers and farmers and the long-term success of the sector. Well-known ‘scandals’, such as BSE and horsemeat, risk long-term damage to our national reputation. Trade agreements should not weaken or lower national standards or lead to greater imports of product with much lower standards, which would displace domestic produce and lead to worse environmental and welfare effects. High national standards have in the past not been properly supported by a ‘levelling of the playing field’ such as through clear and sufficient information for the public. This means domestic produce has been undercut by imports with lower standards.

Preventing unfair competition from imports, and that includes resolving existing unfair competition issues, will be essential to maintaining a viable agricultural industry in the UK as well as driving production of environmentally friendly food production here. It should be seen

²⁶ Scottish Borders Council: Report shows benefits of Borders Railway. 2017 https://www.scotborders.gov.uk/news/article/2011/report_shows_benefits_of_borders_railway

as a strategic necessity in order to ensure a reliable supply of sustainable, high quality food for 65 million people (and rising), as well as avoiding the export of production to areas with lower standards.

How can government and industry work together to open up new markets? (p.63)

Government policy should place greater emphasis on opening up new domestic markets as well as for export. CPRE research shows that local food networks support consumer choice, diverse and distinctive produce, product innovation and development, decent incomes to producers and connect consumers to the production of their local area.²⁷ **Future policy should recognise the value of and support local and regional food economies within the domestic market.**

Funding currently provided under LEADER to support local food production, processing, distribution and retail infrastructure should be maintained in any package of measures targeted to replace the current schemes derived from the EU Rural Development Regulation.

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? (p. 63)

CPRE fully support the aim to remain global leaders in these areas. We have three suggestions on how to achieve this:

1. Clear, effective labelling which is transparent about how food is produced and processed should underpin maintaining current standards and improving them over time. This is now easier as traceability via tracking of product from field to fork is possible.
2. Government should work with major retail chains to progressively raise standards over time within the supply chain. This could deliver greater certainty for food and farming sectors, drive innovation in production, deliver gains in productivity and competitiveness and enable all consumers to benefit from improved standards.
3. The Government should work to ensure that the market rewards growers and producers for delivering the quality of produce, healthy countryside and standards of animal welfare that we urgently need. No other industry is as intrinsically linked to the complexities of the natural world, nor plays such a strategic role in the stability, health and well-being of the nation. Yet, in the UK the average percentage of income spent on food per head is less than in any other EU nation, except Luxemburg. In this context the consultation promotes cheaper food for consumers, at the point of purchase, with many of the costs placed on society in other ways. Government should be bold and make clear that food cannot always be cheap or become cheaper at the point of purchase if it is to be healthy and environmentally sustainable. This is a turning point in farming policy and is the right time for Government to promote high quality British food at an affordable price that supports domestic production but also better health outcomes and an improved environment.

Agreeing trade deals which support these standards will be vital.

²⁷CPRE, *From field to fork: The value of England's local food webs*, 2012

Section 15: Legislation: the Agriculture Bill

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? (p.64)

We agree that the proposed powers of the Agriculture Bill are necessary. However, at present the scope and ambition of the Bill is insufficient. In addition to the powers set out in the Bill, we believe that there is a need to include the following -

1. **A broad purpose.** The Bill should set out parameters for future policies on the face of the Bill. This should reflect page 15 in the consultation paper, which summarises the role of Government in relation to agriculture as:
 - a. "...the regulatory baseline to protect our high environmental, plant and animal health and animal welfare standards and creating a level playing field for farmers and land managers."
 - b. "...encouraging industry to invest, raise standards and improve self-reliance..."
 - c. "...rewarding farmers and land managers to deliver environmental goods that benefit all. Our aim is for public money to buy public goods. In 25 years' time, we want cleaner air and water, richer habitats for more wildlife, **enhanced landscapes** and an approach to agriculture and land use which puts the environment first."
2. A requirement on Ministers to develop and adopt **targets and milestones**. These should be driven by the 25 year environment plan.
3. A requirement on Ministers to commission a **review of funding** every five years from an independent body, with the findings presented to Parliament.
4. **The regulatory baseline.** The Bill should set out how the baseline for future payments is to be interpreted, to ensure consistency and value for money.
5. **Clarity on accountability.** We expect clarity on how the Bill will enable citizens to hold Government to account.

These measures will be necessary if the Bill is to reflect the ambition set out in the consultation paper, and provide citizens, stakeholders and Parliamentarians with the tools necessary to hold current and future governments to account against their commitments. They will sit alongside, and have to dovetail with, the other areas of the Government's current and future legislative programme, including a policy statement on environmental principles²⁸, legislation to create a new watchdog²⁹ to close the 'governance gap' and a potential Environment Act, suggested by the Secretary of State in April this year³⁰.

²⁸ Michael Gove (Secretary of State for Environment, Food and Rural Affairs), November 2017. <https://www.gov.uk/government/speeches/environment-secretary-sets-out-plans-to-enhance-environmental-standards>

²⁹ See reference 27.

³⁰ Michael Gove (Secretary of State for Environment, Food and Rural Affairs) evidence session: Environmental Audit Committee 25 Year Plan inquiry, April 2018. <http://data.parliament.uk/writtenevidence/committeeevidence.svc/evidencedocument/environmental-audit-committee/25-year-environment-plan/oral/81893.pdf>