



Health and Harmony Command Paper

Response by National Parks England

May 2018

Summary

1. National Parks England (NPE) exists to provide a collective voice for the nine English National Park Authorities and the Broads Authority – all of whom have extensive experience of working alongside the farming and land management community to deliver a range of public benefits. NPE is governed by the Chairs of the ten Authorities. Our response represents the collective view of officers who are working within the policies established by the National Park Authorities (NPAs) and follows internal consultation with the Board and the England Agriculture and Rural Development Group. Individual National Park Authorities may submit separate comments, which will draw on the specific issues for their particular area.
2. We welcome the opportunity to comment on the Health and Harmony Command Paper and the other channels of communication that Defra has established to ensure we make the most of the opportunity of developing a new Environmental Land Management System post Brexit.
3. The Natural Capital Committee's 4th report highlighted National Parks as places of "very significant natural capital". They are loved by the public as beautiful places of natural beauty. Yet they have also been shaped by human activity and continue to be working landscapes. It is this understanding that underpins how NPAs approach farming and land management, and which guides our response. We were pleased to see the Command Paper draw on the experience of NPAs through including case studies.
4. It is important to recognise from the outset that the ten National Parks face different circumstances, demographics and geographies and these are sometimes reflected in different policy approaches being adopted when it comes to the detail. This is a real strength – it means we have environmental practice shaped by the places we seek to conserve and supported by the farmers, land managers and communities that live in these places. We believe that there is an opportunity to use this experience and for the Government to build on existing pilots and practice in the National Parks as it seeks to develop the new environmental land management scheme. It is essential that this new environmental land management scheme is flexible at a local level and facilitates delivery of local priorities alongside national priorities.

5. It should be remembered that the work to leave our environment in a better condition than we inherited started a generation ago with the arrival of the first stewardship schemes. Without these our protected landscapes would look very different today with overstocking, drainage, land improvement and in many cases inappropriate conifer afforestation. The next phase of reform should be regarded as a continuation of this good work.
6. There is much that National Parks England welcomes in the Command Paper. For example:
 - the adoption of the public good for public funding model with natural capital at its heart;
 - the desire to move towards an outcome-based system for the next ELMs and for greater ownership by farmers/ land managers in the schemes in which they participate;
 - the recognition of cultural heritage and traditional farming techniques for creating cultural landscapes; and
 - the focus on identifying and overcoming barriers facing the uplands.
7. National Parks England believes further changes should be made to the Command Paper if it is to secure the benefits that the Government are seeking. Chief amongst these:
 - The future ELMs needs to safeguard existing public goods by supporting conservation, *in addition to* enhancement;
 - The ELM should adopt a place-based approach in order to deliver multiple benefits, work more effectively with farmers and land managers, and avoid establishing false choices which can be unhelpful, and at its worst, positively damaging;
 - Urgent action should be taken to extend existing HLS schemes that are due to expire in order to protect past investment in public goods, particularly in our National Parks;
 - Changes are needed to the existing scheme design, and to its delivery, and we set out a range of detailed recommendations for amendment on both with a view to maintaining take up, increasing ownership, and delivering a range of public goods;
 - In principle, we agree with the capping of direct payments and its ending in the future, but NPE would urge Defra to model the impacts of the different approaches to reducing direct payments on the delivery of public benefits;
 - We highlight a number of things that could be done to support new entrants into a career in farming/ land management;
 - We would highlight a significant gap in traditional skills needed to maintain the fabric of our most special landscapes and hope Government will support NPA initiatives to encourage new apprentices;
 - A shortcoming in the Command Paper is its treatment of rural development. The post-Brexit environment provides a real opportunity to address environmental and rural development policy objectives together, rather than in silos. Given our statutory role and on the ground experience, NPAs are keen to have a greater role in supporting rural development. We believe there is a need for a locally administered rural development scheme once the current LEADER programme ends in 2020, for financial support to be geared more towards addressing the needs of micro-small businesses and wider 'place shaping' (supporting local communities to shape their own environments in an economic, social and environmental sense).
8. As we highlight above, NPE warmly welcomes the public goods for public funding approach. We would draw your attention, however, to a number of problems with what is currently envisaged.

- The focus on individual public goods risks inferring that these are mutually exclusive, our starting point should be to deliver multiple public benefits from a parcel of land be that a farm, valley system or wider landscape. This is best achieved by adopting a place-based approach.
 - Environmental management and enhancement takes time, it requires continuity but also the ability to adopt management practices in response to changing circumstances. It is essential that new agri-environment agreements are multi-annual especially when they are focused on enhancement.
 - Public Access needs to be given greater emphasis than currently in the Command Paper. It is through public access that many people will realise the public goods that the ELM scheme will deliver. This is important for making the public goods tangible, particularly for an urban-based population. Securing public access improvements requires collaboration between land holdings since any improvements ought to link in with the existing Right of Way network to be useful. Public access should not just be about physical infrastructure. The new scheme(s) need to provide for educational access; help the farming community tell their story (i.e. explain and promote the public benefits they are delivering); and facilitate innovation (e.g. use of volunteers, support for care farms etc.).
 - Linked to the point above, the list of public benefits that might be delivered through the new scheme(s) needs to include educational access and water management. It is essential that the scheme(s) is also able to integrate local priorities.
 - The new scheme needs to be demonstrably better at integrating woodland creation and management with other environmental objectives than currently.
 - There needs to be ongoing funding for facilitation, and to support trusted advisors that experience shows will be vital to the transformation required in farming/ land management following Brexit.
 - We believe there is a continuing need for Government action on biosecurity, and would extend this to supporting all pollinators, not just bees.
9. In many places through the Command Paper, the Government asks how it can better balance national and local priorities and support better collaboration? Both are essential if progress is to be made at working at catchment scale/ landscape scale, as envisaged by the 25 Year Environment Plan. NPE would welcome discussing with Defra how the statutory National Park Management Plans (often referred to as Partnership Plans) can support these objectives. These provide an existing under-utilised mechanism in agri-environment policy. There is a wealth of experience within National Parks (and Areas of Outstanding Natural Beauty) of delivering national policy priorities in ways that are responsive to local community or land owner needs. We would urge the Government to look at this model when considering how the ELM might be taken forward. In addition, NPAs have been behind many projects that have supported farmer collaboration. We highlight a couple in our response and would be happy to elaborate on these, and others from across the National Park family with officials.
10. NPE takes a particular interest in the Command Paper's proposals for the Uplands. We welcome the acknowledgement that these areas face particular challenges. It is our desire to transition these areas and communities from places of 'disadvantage' to 'areas rich in natural capital, with a natural advantage', and are keen to work with Government and other partners to achieve this. We believe that a system of locally-led community development is essential and that NPAs are well placed to lead and facilitate this through their existing partnership working. For too long we have divorced farm support from agri-environment

and from wider rural development. Integrating them in a place-based approach will provide more effective delivery and better value for public money. Leaving the EU allows us to shape an approach to rural development that is based more on outcomes (proposed by local areas) and less on measures prescribed by the EC or national governments. Existing practice in the National Parks demonstrates the potential of such an approach to deliver integrated solutions. Additionally, we would highlight:

- poor connectivity (mobile and broadband) and a lack of affordable housing remain key issues in National Parks;
- the need for business advice to help farmers/ land managers through the agricultural transition period; and
- if the agricultural transition is managed poorly and future environmental land management schemes are not sufficiently attractive, cultural and environmental assets could be lost, and rural poverty could increase.

11. Finally, in seeking to support the uplands, the Government also needs to recognise that there are important protected landscapes within our lowlands that rely on traditional farming techniques and which also need restoring and enhancing.

National Parks Circular 2010

Promoting and delivering agri-environment schemes and food security

56. The Parks provide high quality environments rich in biodiversity and prized for their high quality landscapes and cultural heritage. These landscapes have been shaped by generations of farming activity. As well as food production, farming also delivers an array of public benefits that include: storage of water and carbon, protection of historic features, keeping the landscape open and accessible and management of soils. The Parks play a role in the provision of a sustainable, secure and healthy food supply through the wide range of modern farming practices that take place in them, for example, the production of vegetables, fruit, grapes (for wine), salad crops and combinable crops. In addition, livestock rearing contributes to food production and to conservation grazing. Food processing adds value to farm products and provides enterprise and employment opportunities. Food products sold locally and further afield can increase the economic viability of these more marginal areas and draw more visitors to the Parks.

57. The Authorities play an important role in the development, promotion and delivery of agri-environment schemes and are expected to work closely with Defra and Natural England to ensure that agri-environment scheme delivery is properly integrated with Park objectives and activities within the farmed environment. Authorities should continue to promote agri-environment schemes and other measures that enable farmers and land managers to deliver a wide range of ecosystem services and sustainable, secure and healthy food supplies. Farming in the Parks should embrace modern farming practices in order to support an agricultural sector that can sustainably increase its resilience and productivity, taking account of climate change.

Response to detailed questions posed in the consultation paper

12. Below we set out National Park England's response to the detailed questions set out in the order presented in the Command Paper – focusing on those questions where NPAs have most expertise.

Consultation paper questions:

Section 2 Reform within the CAP

1. 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

1.1 No comment.

2. 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?

Extend Higher-Level Stewardship Schemes

2.1 The most urgent action that Government can take to safeguard public benefits that have been invested in our National Parks and AONBs would be to **extend the life of expiring Higher- Level Stewardship agreements**, with a light touch review to ensure that the agreements are delivering the objectives in the 25 Environment Plan. National Park Authorities would be willing to assist in this.

2.2 NPE would urge Ministers to do this to avoid significant areas that are already in schemes from falling out of them. This risks jeopardising the environmental gains that have been achieved over many years. Data from Natural England indicates that the area of land under agri-environment agreements in the English National Parks has already reduced by 6 per cent since 2013. This figure is likely to be an under-estimate for a number of reasons including because of a time lag in agreements being entered in to and taken off of the Natural England monitoring system. There is in excess of 250,000 ha of land in the English National Parks under environmental stewardship agreements that are due to expire within the next three years (2019-2021) and we believe, based on recent experience, that there is a real risk that many of these agreements will not be renewed for a variety of reasons (capacity and the complexity – perceived or actual of the Countryside Stewardship Scheme). The effect will be less land under environmental management and this will not assist us in sustaining the National Parks nor help with the Government's ambition of enhancing the environment. Countryside Stewardship is also narrow in its focus on water management and

biodiversity and does not, we believe, provide a firm foundation for delivering the policy objectives and aspirations outlined in the 25 Year Environment Plan.

Amendments to the implementation and design of the current system

2.3 National Park Authorities work closely with the farming communities that have shaped the landscapes of our National Parks. Within the Lake District National Park, for example, farmers have shared with the NPA a number of barriers to scheme take-up. This includes, the mid-tier in the uplands where the combined effect of payment rates being too low, no capital works, and it not being that simple to combine options and supplements are dis-incentives. In addition, the minimum spend of £7,500 for the small grants scheme is too high for many small upland farmers wanting modest investment in smaller items e.g. EID readers. And generally, the scoring is said to favour larger farms over smaller farms.

2.4 Drawing on the experience across the National Park family, **we believe there are a number of changes that could be made to achieve better take-up and environmental objectives.** We would be happy to discuss these suggested changes with officials.

2.5 The changes include:

Scheme implementation

- Make both annual revenue and capital payments to land managers within the agreed payment window. Many farmers/landowners are having to wait months (sometimes over a year) for payments from public schemes. This is not helping with cash flow and does not act as a good advert for scheme participation. This practice is at best 'morally wrong': we rightly expect agreement holders to fulfil their obligations and need to ensure that if they have delivered they receive payment promptly. Natural England and the Rural Payments Agency (RPA) need to fulfil their contractual obligations. At present schemes are very one sided with punitive fines if agreement holders don't fulfil the agreement yet absolutely no come back for land managers when Natural England/RPA fail to make payments within the agreed timeframes. Understandably this puts people off entering the scheme.
- Reduce the bureaucratic burden and excessive evidence requirements for the scheme that is putting people off and is preventing Natural England and RPA administering the scheme effectively. Some NPAs have examples of Natural England asking for too much from farmers ending up with no agreement, bad feeling from willing farmers, and risk of loss of previous investment gains, rather than accepting a more modest gain negotiated to fit with long term farming aspirations.
- In Higher Tier Agreements allow advisors more discretion to tailor prescriptions to the local situation rather than using the standard prescription sets. More could be achieved if there were more highly trained advisors who really understand land management and conservation and are able to tailor management prescriptions appropriately, rather than relying on standard prescription sets.
- Enable properly trained and experienced advisors to spend more time out on the ground helping land managers to understand the environmental outcomes that are desired and jointly working up solutions to delivering these outcomes.

- Allow more time for 'after care' / follow up visits to provide ongoing advice to land managers and amend agreements as necessary so that the Stewardship agreements deliver what they are intended to.
- Bring in better monitoring of outcomes/scheme delivery with farmers and advisors working together on this. In National Parks, dedicated Farming Liaison Officers are willing and able to assist with this if it can be resourced sufficiently.
- Allow high quality, reliable, locally collected evidence that is not yet on the national databases to be used to inform both scoring and agreement option eligibility so that important areas of habitat and areas important for species of conservation concern e.g. waders such as curlew are not missed and denied entry into the scheme.
- Change the way in which agreement breaches are handled so any fines are proportionate. This should mean potentially larger fines for deliberate damage to SSSIs, but lower penalties for faults which will not cause environmental harm e.g. errors in Rural Land Registry (RLR) mapping.

Scheme adjustments

- Allow greater flexibility for changes in RLR mapping to accommodate environmental management e.g. new woodland planting. At present concerns over penalties and late payments arising from RLR changes is putting land managers off undertaking work such as woodland creation and other positive habitat management.
- Go back to having more than one application window per year. If possible have quarterly start dates, rather than annual January starts with all the problems that go with an annual start date, particularly the 11 month gap between schemes for some farms – many of which cannot cope with the impact on cash flow.
- Keep a separate simple capital grants scheme for straightforward items: for boundaries (hedges, walls, individual trees including fencing and other protection e.g. top wiring and tubes etc), bird and bat boxes, bracken control, water quality and simple flood management items, educational access.
- Put permissive access options back into the scheme.
- A properly designed and funded public access component could have benefits to farmers managing existing public access on their land as well as addressing the deficiencies in the RoW network for 21st century use. It could have safety benefits if cyclists, walkers and horse riders had alternatives to dangerous sections of road, as well as helping connect people with food farming and the environment.
- Properly integrate woodland creation and management into the main scheme. The different application windows and lack of joint working between FC and NE staff leads to poor environmental outcomes with opportunities lost for woodland creation.
- Allow more flexibility in planting densities for woodland creation to achieve biodiversity and landscape outcomes.
- Allow payments on open ground on edge of planting to ensure schemes comply with UK Forestry Standard landscape guidelines e.g. scalloped edges.
- Allow more flexibility in the use of options for woodland and scrub to be created or ideally create a new option for the creation of low density woodland for biodiversity and landscape.

- Look to include agro-forestry options integrating woodlands and grazing where appropriate to deliver environmental outcomes. We are aware this is already happening in Scotland.
- Increase value and length of time maintenance payments paid for woodland creation, especially in the uplands;
- Include payments for upland heath recreation. These were available under Higher Level Stewardship and are not in the higher tier for Countryside Stewardship. Upland Protected Areas have ambitious targets to re-create and link areas of internationally important priority habitat such as upland heath to put the Lawton Report into practice. Agri-environment schemes could helpfully support such efforts.
- Include payments for predator control during the ground nesting bird season as part of a habitat management package to conserve and enhance populations of key species such as curlew, lapwing, redshank, snipe, black grouse etc.
- Increase financial incentives for wetland and pond creation.
- Remove the requirement for land to be within the Moorland Line in order to be eligible for the UP3 option. Due to anomalies in the mapping of the Moorland there are areas within National Parks that contain priority bog and heath habitat below the moorland line which should be able to come in to appropriate options but cannot because of the land classification.
- Provide funding for creation of moorland management plans.
- Adopt a whole farm/ land management approach in which all agreement options are the same length of time on a holding. Having part of a farm in a 10 year option (for example on moorland) whilst in other areas the options are for 5 years can cause real problems for land owners.
- Allow more options to be used on a part parcel basis.
- Allow capital works to be undertaken over a 3 year period rather than 2 years. This is particularly important for farms undertaking a lot of work such as large scale tree planting and dry stone walling where several seasons may be needed to undertake the work. NPAs have known agreement paperwork to be issued late, causing whole planting seasons to be lost.
- Allow multiple PA1 management plan payments to be allocated to individual schemes to provide necessary advice.
- Increase the length of time over which PA2 Feasibility studies are valid to enable this important tool for informing work such as NFM to be used effectively and efficiently.
- Learn from the current Traditional Farm Buildings Restoration Pilot and integrate this into future schemes.

Section 3 An ‘agricultural transition’

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

a) Apply progressive reductions, with higher percentage reductions applied to amounts in higher payment bands *

b) Apply a cap to the largest payments

c) Other (please specify)

- 3.1 The impact of reducing Direct Payments on the delivery of public benefits during the agricultural transition period will depend to some degree on how farmers engage with Pillar 2 schemes so Direct payments cannot be considered in isolation.
- 3.2 We agree in principle with the capping of direct payments and ending them in the future. However, we would urge Defra to **model the impacts of the different approaches to reducing direct payments on the delivery of public benefits**. On Dartmoor Direct Payments and Pillar 2 schemes are often equally important. Of great concern to the National Park is the potential for land to come out of agri-environment agreement during the transition period (see previous comments). If this were coupled with reductions in the Basic Payment Scheme it could threaten the viability of farms and delivery of environmental outcomes.
- 3.3 Money from the capping of BPS needs to be used for environmental management – to support the transition to payment for public benefits that the Government has clearly signalled. The modelling we are calling for needs to consider the need for this link to be at a farm level and in association with tailored advice on how to develop the farm business to combine environment and economic considerations. Not to do so creates a risk of policy and financial uncertainty.

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

- 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)**

- 4.1 There is a need to **retain cross compliance rules** but there is also room for simplification. We would argue that in some cases it needs to be strengthened e.g. ensuring EIA regs, Burning Regs are properly enforced. Other elements, such as punitive fines for missing ear tags in hill stock, should be reduced.
- 4.2 Funding for a retirement scheme should be considered to allow those who wish to leave the land to do so and let new entrants in.

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

5.1 We would suggest:

- Ensuring land managers take seriously the changes coming and start to act to re-align their businesses.
- Availability of payments for public goods. Farmers, particularly High Nature Value Farmers, need to be able to access funding for delivering environmental outcomes before Direct Payments are totally removed so that they can continue to deliver for

the environment and to make sure that some don't end up reversing environmental benefits they have been delivering in an attempt to stay in business.

6. How long should the 'agricultural transition' period be?

6. Agriculture, particularly in the uplands, is long term. Given businesses need time to restructure, we would recommend a **5-year transition** period.

Section 4 A successful future for farming

7. 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:

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)

7.1 NPE believes that:

- We need to create a 'thirst for learning' and this is best done through farmer to farmer. Experience from Dartmoor and Exmoor Hill Farm Projects shows that this approach does work often leading to new forms of collaboration and innovation as well as knowledge transfer.
- We should look at how 'continuing professional development' might be incentivised through conditions on future grants and loans.
- We need to trial an approach that combines environmental and economic advice at a farm business level.

7.2 Obstacles to investment include:

- The underlying profitability of the business.
- Lack of succession and /or security of tenure.
- Lack of appropriate courses/advice

7.3 National Parks are keen to pilot a system of integrated farm environment and business plans building on work done in the Yorkshire Dales and North York Moors National Parks. We believe that these plans could provide an essential tool for integrating environment and economy, identify the scope for environmental enhancement and the outcomes that can be delivered at a farm and potentially pan farm level.

7.4 NPE welcomes the emphasis on producing high quality food and environmental protection as the foundation of the new domestic agricultural policy. New entrants and young people seeking a career in farming and land management in National Parks will need skills in agriculture but also understanding of the principle of "public money for public goods" that will be the cornerstone of the new agricultural policy.

7.5 NPAs are in a good position to learn lessons from previous initiatives and develop programmes in partnership between farming networks, public agencies, and other stakeholders. The New Forest NPA, for example are supporting the upskilling of farmers and commoners through a Heritage Lottery Funded *Our Past Our Future* programme and apprentice ranger schemes and would like to do more in this area. Other NPAs have experience of apprenticeship and traineeship schemes and can provide examples.

8. 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)

8.1 NPE believes all of these are relevant.

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

9.1 Many people want to come into farming and land management, and there are a number of actions that can be taken to support them. These include:

- New schemes that empower farmers/land managers to deliver environmental protection, enhancement and high quality food production rather than a system of prescription.
- An integrated farm plan that identifies training requirements and opportunities linked to potential future management opportunities
- Tenancy reform to free up access to farms.
- Addressing the shortage of affordable housing in rural areas.
- Decent connectivity e.g. broadband and mobile phone coverage in rural areas.
- Providing retirement incentives.
- Increasing training requirements for receipt of public funding.
- Better integration of farming, forestry and environmental land management.
- A new entrant support scheme including access to finance, training, mentoring.
- Increase profile relating to the land management sector.

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

10.1 We believe it does and would benefit from significant reform.

11. 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:

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

11.1 There are a range of research priorities, but NPE believes **soil health (e), natural capital and ecosystem services** and how agriculture influences them are the most important.

11.2 We would support regional research from academic institutions and research syndicates for improved knowledge sharing.

12. 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)*

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

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

- a) Business / financial*
- b) Risk management*
- c) Leadership*
- d) Engineering*
- e) Manufacturing*
- f) Research*
- g) Other (please specify)*

14.1 NPE believes that there are **great gaps in traditional skills**, such as hedge-laying, walling etc. which are the skills that are needed to maintain the fabric of the landscape, particularly in the uplands. NPAs have come together to develop a Countryside Worker Apprenticeship and we would welcome Government support in promoting it.

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

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

15.1 No comment.

Section 5 Public Money for Public Goods

17. 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:

- 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**

17.1 We fully **support the direction of travel** of a clearer connection between the payment of public money for the provision of public goods and benefits. Future payments need to be for both **management (above the statutory minimum) and enhancement** of public benefits and not just for enhancement. There is a risk with an enhancement only focus that public payments 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.

17.2 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.

17.3 We **support the broad approach** to public goods and benefits outlined in the Command Paper and in the Secretary of State's speeches over recent months. Our [Farming in the English National Parks](#) paper advocates an approach focused on delivering multiple public benefits, not a narrow focus on one or two objectives.

17.4 We support the content of the public goods and benefits listed in the Environmental enhancement and protection section, particularly the recognition of the environmental **and** cultural value of our rural landscapes and traditional ways of life. Our National Parks are living, working landscapes that are the product of the interaction between people and nature over thousands of years. It is therefore important to integrate both natural and cultural capital in scheme design. NPE would ask that the new scheme give greater recognition to the role of agri-environment in the protection of our historic environment, both those 10% of the highest significance (Scheduled Monuments, Listed Buildings) and the 90% of historic features which contribute to landscape character and do not have any statutory protection (cross compliance). Thought will also need to be given to how to provide expert historic environment advice to farmers to better enable them to select options which conserve and enhance cultural heritage.

17.5 We are surprised that **water resource management** is not listed. We urge that it is added to this list. Reducing both flood and drought risk and increasing resilience to both are critical public benefits that farming, forestry and other land management have a key role in delivering. Natural Flood Management and "slowing the flow" are high on national and

local agendas, including in the Government's own 25 Year Environment Plan and should be recognised in the Command Paper. There is also a wealth of experience in the Catchment Sensitive Farming initiatives that should not be lost.

- 17.6 We support the Command Paper recognising the public goods and benefits of preserving rural resilience and traditional farming and landscapes. But we feel that this strand of **wider rural development** is still too weak and underdeveloped in the Command Paper. We welcome the Command Paper referring to Defra working with the Ministry of Housing, Communities and Local Government on the design of the UK Shared Prosperity Fund, as part of the Government's Industrial Strategy, to support rural businesses. The Command Paper is the perfect opportunity for the Government to signal a move towards integrated rural development bringing together environmental, economic and social aspects and supporting rural resilience; which would be a marked improvement to the silo-based approaches of recent Rural Development Programmes.
- 17.7 Whilst food production is not technically a public good, high quality, unique provenance food products are a key output from National Parks. The aim should be sustainable food production which works with the natural and cultural interests and which is in balance with the full range of public goods and benefits. Recognition of the role that improved productivity and competitiveness, and animal and plant health and welfare have to contribute to this is welcomed.
- 17.8 We welcome the recognition of **public access** being a public good and the importance of rights of way and tourism to rural economies. Ensuring quality public access is a vital means by which the public will be able to receive the benefit of the public goods that will be delivered by the new Environmental Land Management scheme.
- 17.9 We also urge **educational access** to be included in this. We know access to farms is important for raising people's understanding of farming, and the relationship between human activity, landscapes and wider environment. This is particularly valuable for our younger generations. This should be recognised as an explicit public benefit within the public access element of the new scheme. We also encourage the recognition and development of the public health and well-being benefits of access and recreation in the National Parks.
- 17.10 We welcome the recognition of the importance of NPs **visitor economies** to rural areas in and around NPs. These visitor economies depend on the multiple public goods and benefits, produced by good management of the full range of National Parks' public goods and benefits as outlined in the Command Paper.
- 17.11 Ranking of the environmental outcomes and other public good options by order of importance is unhelpful and doesn't recognise the **inter-related nature of the factors** that drive environmental and economic outcomes for rural communities. We feel strongly that the environment is about the connection between landscape, natural heritage, cultural heritage (including the historic environment) and the natural environment (habitats and species). NPE believes that in order to create and maintain a healthy environment, each element requires valuing and caring for. A better approach is to seek to deliver multiple benefits from a parcel of land - 'multiple wins' as many benefits can be co-delivered.

17.12 "[Farming in the English National Parks](#)" advocates an integrated, **place-based approach** to farming, land management and wider rural development. Delivering multiple public benefits requires an understanding of the geography of the place. NPAs are well placed to do this, working with farmers, land owners and managers, local businesses and communities, and visitors. A place-based approach is also more likely to support farmer collaboration, and greater environmental enhancement (for example for species recovery, catchment management, or public access) where work needs to be linked across farms. 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.

18. 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

18.1 We would identify priorities 'e' and 'f' from the list above. However, National Parks England would again reiterate that this approach is generating false choices. We are firmly of the view that these objectives are not mutually exclusive and that a **place-based approach** is far more likely to deliver multiple public benefits. Also, some public goods are best safeguarded through regulation (options a, b and c) and perhaps, time limited, grants to support the move to higher standards.

18.2 As mentioned above, ensuring **quality public access** is a vital means by which the public will be able to receive the benefit of the public goods that will be delivered by the new Environmental Land Management scheme. An indirect benefit of this is that it is likely to increase public support for the ELM scheme and through more healthy lifestyles lead to potential savings in other areas of public expenditure.

18.3 To deliver the greatest public access benefits requires a more integrated approach than implied by the Command Paper. Where this does not happen, the danger is that the existing access network becomes fragmented, or new routes do not link up effectively.

18.4 What is meant by public access should be clearly defined and could include new and enhanced rights of way, the creation of multi-use routes, new area access, and educational access. We would also like to see public access payments not just being limited to physical infrastructure but potentially extending to engagement with visitors, use of volunteers and social/health benefits of access. Payments should be more focused than under the Stewardship Scheme and provide access for a purpose rather than for its own sake. For example, payments could be made for routes which provide access to historic sites, visitor destination points, landscape features and habitats or improving the network for the use of local communities. 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 stone pitching, and surface improvements or maintenance where user pressure is great or to increase accessibility for those who are less-able.

18.5 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. However, it is also important that the scheme should show value; for example, there should be a presumption that the permitted access will become a permanent right of way after the agreement ends unless there are clear and evidenced reasons why not. To lose routes after only a few years would be a poor use of public money and give rise to adverse impacts on the public and their benefit from the use of these routes. This should involve a mechanism for paying for permanent public rights of way and a better process for assessing the public benefit for any permitted access proposal. Thought also needs to be given about how they are promoted/publicised and the length of agreements. Public access 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 and the impact on adjacent land and business activities.

18.6 Incentivising a number of farms in an area will 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.

18.7 Wherever possible, public access elements should align to Rights of Way Improvement Plans, Cycling and Walking Investment Strategies, and other local priority programmes.

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

19.1 We believe a place-based approach would allow for greater flexibility to deliver a wider range of public benefits. In addition to those public goods listed in the Command Paper, we would add:

- Large scale restoration of habitats and species
- Water and flood management
- Geo-diversity (or its clarification that this comes under Cultural Heritage)
- Genetic diversity – both in nature and farmed plants and animals
- Providing opportunities for recreation, health and well-being – so both nature and people are in health and harmony (as per the Command Paper's title)
- Production of high quality food, fibre and energy based on sustainable land management practices that deliver multiple public goods for society.
- Education and increased understanding. Making the countryside relevant to the urban-based population. Particularly engaging children so they have an understanding and therefore care about the wider countryside and rural environment. We very much believe in helping the public to understand what their money is spent on and wish to help demonstrate this.

Section 6: Enhancing Our Environment

20. 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:

- 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)

20.1 NPE firmly believes that all of these are important and that the Command Paper is asking the wrong question. Central to our future approach should be a system that seeks to deliver multiple public benefits from a parcel or parcels of land and incentivises collaborative action if this adds value. We must avoid a system of national prescription that prevents local flexibility. There should be a national framework that seeks to maximise the total value of public benefits but allows for local choice – what may need to be prioritised should reflect the characteristics and needs of local areas. National Park Authorities work with a range of land-owners, public and private organisations and individuals to develop **National Park Management Plans or ‘Partnership Plans’**. These statutory documents set out the long term environmental priorities of an area against national guidance – they could be a useful model for demonstrating how local priorities can be agreed and used to shape future land management schemes. AONB Partnerships prepare similar plans.

20.2 The focus for NPA’s activity is to deliver multiple public goods through multi-objective schemes. Landscape scale opportunity mapping plus local knowledge can be combined to great effect and NPAs continue to be well placed to support this sort of activity. This is recognised in the Government’s National Parks Circular 2010. By understanding the needs and motivations of the land manager; the environmental conditions of the wider landscape, and adopting a flexible integrated approach – it is possible to achieve more than through a narrowly prescribed model. We would highlight the need for current schemes to reflect this more integrated approach. This will make them more attractive to farmers and land managers. As part of this, NPE would advocate better integration of farming and forestry schemes.

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

21.1 NPE’s [Farming in the English National Parks](#) paper placed an outcome-based approach at the centre. We believe it should be a **fundamental underlying principle** for the

new ELMs. This means changing to a culture of positive reward for delivering environmental outcomes rather than compensation for loss of production.

- 21.2 There is a growing body of evidence collected by a range of organisations across Europe to show that outcomes-based approaches can deliver more effectively than more prescriptive based schemes. This evidence includes Defra's own research and the experience of agri-environment delivery bodies, including National Park Authorities.
- 21.3 Land managers that the NPAs have engaged with in National Parks generally prefer this approach because they are clearer about the outcome they are aiming for and are given more flexibility, autonomy and trust to deliver. Some are keen to be paid on results. We acknowledge that others are more nervous of this approach as there are risks, and this depends on the detail of scheme design.
- 21.4 Outcomes based schemes can be extremely motivational and lead to dramatic environmental benefits, but do require **investment in advisor/facilitator support**, especially in the early stages when land managers are still learning new skills; including monitoring their own performance. This should be seen as an investment in building capacity and knowledge that delivers better returns rather than a narrowly defined additional cost.
- 21.5 The RBAPs pilots which were undertaken in the Yorkshire Dales National Park are providing clear evidence of the benefits of the Results Based Approach. Further work is needed, particularly to develop the approach for whole farms to cover the full range of public goods. NPE very much hope Defra will provide resources to allow this vital work to continue and be expanded, including to other National Parks.
- 21.6 In order to progress this, it will be necessary to ensure that any new schemes are joined up and/or designed to work together with existing or other schemes. A farm/farmer centric approach will be needed to scheme design to ensure various measures actually work together in a practical way and are not just administratively convenient. There are existing models that demonstrate how this can work, for example, Dartmoor Farming Futures and the Northern Upland Chain Local Nature Partnership's vision for High Nature Value farming.
- 21.7 NPAs are in discussion with the team at Defra working on ELMs and looking forward to working closely with Defra and land managers within the National Parks to develop the thinking further. NPAs and the farmers in these areas have considerable experience of past agri-environment schemes, including participating in both Defra schemes and those run by some of the NPAs e.g. North York Moors which we believe will be valuable to Government.

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

- 22.1 Within National Parks and Areas of Outstanding Natural Beauty there is a ready-made vehicle for achieving this – **the National Park/ AONB Management (or Partnership)**

Plan. Together these already cover 24% of the country and already balance national and local priorities.

22.2 Dartmoor Farming Futures demonstrates delivery of national and local priorities, a focus on outcomes and empowering the farming/land management community to deliver these outcomes and monitor the results. It is one of a series of pilot/trial ideas submitted by NPAs to Defra to aid development of the new environmental land management system.

22.3 In addition to the above, we would recommend:

- Using National Character Area Assessments as a framework.
- More regularly updating the datasets currently used for targeting agri-environment scheme delivery.
- Enabling locally available information and knowledge to be used in conjunction with the national datasets (which are often incomplete and out of date).

22.4 Additional opportunity mapping work (such as that carried out in the Northern Upland Chain Local Nature Partnership, Exmoor National Park etc) is taking into account the full range of public goods, combined with local knowledge and ground truthing. This provides extremely useful material to judge willingness to manage for priority outcomes and could be used more regularly to help inform where public money could be channelled to deliver greatest benefits.

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

23.1 Long term work in Protected Areas, and more recent initiatives such as the Facilitation Fund Farmer Groups / Farm Clusters as well as other catchment-wide and landscape scale initiatives are beginning to show how it is possible for land managers to work collectively to deliver environmental outcomes, including flood management measures and biodiversity gains. It is evident from a lot of this work that a critical component is **trusted advisors** that act as intermediaries between individual land managers and between other agencies, organisations and those with specialist knowledge including researchers, consultants and others. **Ongoing funding for facilitation and advice** is going to be critical for the delivery of environmental outcomes in the future, especially with a shift towards natural capital and ecosystem services approaches which are new to many. To make it relevant to land managers and to maximise the opportunity for buy-in from land managers, integrated advice on a broad range of topics needs to be supported, including that related to farm productivity, health and welfare etc, not just pure environmental outcomes.

Section 7: Fulfilling responsibility to Animals

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

24.1 Yes. Regulation is clearly part of the delivery mechanism, but training, sharing of best practice and support for implementing it is also needed.

25. 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)

25.1 Yes (a). Consumers are generally very confused by current information on food packaging relating to welfare and environmental standards. Standards and labelling of them needs to be simpler and not only indicate welfare, but also environmental standards of production and food miles. Only by consumers understanding this will high quality British producers be able to compete with producers from other areas not producing to the same high standards.

26. 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.

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

27.1 No comment.

Section 8: Supporting rural communities & remote farming

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

- 28.1 Too often our approach to rural development has been focused on prescribing eligible measures through a national Rural Development Programme rather than considering the outcomes we want to support. Brexit provides an opportunity to address this and to forge a new approach that provides the flexibility for local areas to identify the outcomes they want to deliver to support their communities, economy and environment and to determine how best to achieve these outcomes. A system of 'rural deals' has the potential to deliver efficiencies, better outcomes and innovation. The National Park Authorities would be keen to trial such an approach.
- 28.2 NPE supports the opportunity to recognise and celebrate the wealth of public benefits that these areas provide, so turning 'Disadvantaged' into a 'rich resource' of natural and cultural capital; this fragile and challenging environment in the uplands requires sophisticated human skills sets to maintain the landscape in a traditional way. Many of these traditional skills have been used by the hill farming community for generations.
- 28.3 We welcome the reference to the Lake District World Heritage Site as a prime example of the importance of the "cultural landscapes" of the National Parks. The continuity of the **living cultural heritage** of much of the farming in National Parks is a public good in its own right and needs to be recognised and rewarded as such. Supporting the continuity of active farming families and communities is critical to maintaining and delivering the full range of public goods and benefits outlined in the Command paper.
- 28.4 It is agreed that compared to lowland farms, farms within Severely Disadvantaged areas have less opportunities for increasing sustainable productivity or diversifying into other forms of agriculture or other activities. If the agricultural transition is managed poorly and future environmental land management schemes are not sufficiently attractive, cultural and environmental assets could be lost, rural poverty could increase and these communities lost.
- 28.5 Supporting farming, land management and rural communities in the national parks and the uplands should continue without a break. The 25 Year 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.
- 28.6 We believe that the special circumstances of our upland National Parks demand special measures and would like to see a system that takes forward the thinking outlined in the report ['Farming in the English National Parks'](#).
- 28.7 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 and commoners, recognising the risks of land abandonment, rural depopulation and negative impact on the rural economy if these

farm units are unprofitable. A profit foregone model does not help incentivise environmental innovation and delivery when the profit you are ‘forgoing’ is, at best, minimal. We need to move towards an outcome-based approach that offers fair financial incentive for delivery of those outcomes. This is an area that needs further trialling and experimenting: building on the experience of the results-based scheme in the Yorkshire Dales but extending it to apply to the whole farm and delivery of multiple benefits.

28.8 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.

28.9 Finally, whilst we agree with the need to shine a spotlight on the uplands and develop effective support mechanisms in these (often) severely dis-advantaged areas. NPE would wish to seek reassurance, that the Government acknowledges the rich cultural heritage to be found in **protected lowland landscapes** – such as the drainage Mills of the Broads, or the system of Commoning in the New Forest National Park.

28b 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***

28.9 The challenges facing rural communities has been well documented. Rather like the need to adopt a place-based approach to delivering public benefits; the Government needs to adopt a **community-based approach** rather than see these challenges in isolation. Broadband coverage may be little consolation if there is no affordable housing for example.

28.10 Within National Parks, we would identify **poor connectivity and affordable housing** as key challenges for our communities. NPAs (and collectively through NPE), are keen to work with Government, the private sector and others to address these. In addition to the challenges highlighted in the Command Paper, we would highlight:

- the need to sell the story of the full range of public goods that this type of special landscape delivers so that there is consistent and continuing support;
- the need for a locally administered rural development scheme once the current LEADER programme ends in 2020;
- the high costs of accessing markets;
- rural crime;
- business viability; and

- aging population.

29. 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?

29.1 Much of our most highly valued environmental public goods are associated with low intensity, marginal farming in upland areas. A new ELMs is therefore a key part, but by no means the only requirement, for supporting environmental, social and cultural benefits in the uplands. Proper integration of environmental and socio-economic funding streams is required. We believe important lessons can be learned from previous ERDP programmes, and NPAs are well placed and keen to have a greater role in facilitating future rural development programmes.

29.2 To address the challenges facing rural communities, we would highlight:

- The need for rural communities to be able to access the infrastructure and services, including broadband and fuel, at **same costs** as elsewhere in country. This helps to bring the skilled labour in and puts the heart back in to communities.
- An appropriate level of **funding support** for rural areas, and National Parks in particular, needs to be **allocated and ring fenced**. The current estimate of public expenditure on farm/land management support within the English National Parks of more than £160m per annum (*£67m for agri-environment scheme payments (based on 2016 figures) and the £94m for Basic Payment Scheme (based on 2015 figures)*) plus rural development scheme grants will need to be exceeded if these special landscapes are to be enhanced in line with the aims set out in the 25 Year Environment Plan.
- Public investment in farming is essential for the economic sustainability of many National Park farms. Basic Payment Scheme and agri-environment agreement payments equate to over 90% of farm business income for LFA grazing livestock farms on average and 70% for lowland grazing livestock farms. Despite this investment many farmers in the National Parks, especially the upland National Parks, only just break even and breaking-even is not sustainable in the medium to long term. Farm operations and the environment requires **continual re-investment** to remain viable and ensure natural capital is not lost.
- The UK's forthcoming exit from the EU offers a real opportunity to rethink policy approaches. We recognise that the £3bn plus annual investment in farm support by the taxpayer will be under much closer scrutiny than ever before but it is essential that we sustain and improve the supply of public goods produced by our National Parks (including, high quality landscapes, biodiversity, carbon storage, water management, opportunities for public access, enjoyment and understanding). Public and private investment in 'high value farming systems' in the National Parks is essential to the maintenance of these treasured places: imagine the Yorkshire Dales without stone walls or barns; The Broads without grazing marshes; or Dartmoor and

the New Forest without the tradition of common grazing or the South Downs without chalk grassland?

- The statutory **National Park Management Plans** provide an important existing framework for integrated delivery which is place based, collaborative, integrated, and draws in public, private, NGO and community initiatives to shape these special places over the long term.
- **Lessons need to be learned from past funding programmes**, including ERDP programmes e.g. RES, PES, VTS, LEADER etc as well as EU LIFE, LIFE +. Initiatives such as the Sustainable Development Funds (SDF) that many NPAs administer show that by avoiding excessive bureaucracy it has been possible to reach deep rural communities that many other schemes have not, and to facilitate real changes and learning.
- Much vital support for rural development has previously come from European funding streams, so national schemes which support diversification, new businesses and development / expansion of existing businesses is needed. NPE believes funding is needed not only for capital investment, but also business advice, research, marketing, skills and training.
- A high proportion of rural business are **micro/small businesses**. It is therefore important that future-funding streams are available to businesses of this size, not just larger businesses.
- **Grants for some aspects of rural life**, particularly non-profit making elements relating to social and cultural benefits may need a higher grant intervention rate than 40-50%. The ability to provide (where appropriate) small grants offering up to 100% funding are extremely important as it can be harder to find match funding for deep rural communities.
- We welcome the **cross-departmental working** between Defra and DCMS with regard to rural communities and business. We would look to extend this to the contribution of cultural heritage to the resilience and wellbeing of these communities. Such cross departmental collaboration would also increase the success of the aspirations in the Command Paper regarding landscape, heritage and engagement.

Section 9 regulatory culture

30. 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)

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

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

30.1 We believe a robust regulatory framework is an important pre-requisite to the achievement of environmental enhancement. The regulatory framework should include public access (see response to section 5) and enshrine the polluter pays principle. It needs to be clear and transparent with a risk-based approach to monitoring and easy enforcement processes.

Section 10. Risk Management

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

a) Desire to protect themselves from general risks (e.g. – revenue protection)

b) Desire to protect themselves from specific risks (e.g. – flooding, pests or disease)

c) Provision of government compensation for some risks

d) Cost of insurance

e) Complexity and administrative burden of insurance

f) Availability of relevant insurance products

g) Other (please specify)

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

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

33. No comment.

Section 11 Protecting crop, tree, plant and bee health

36. 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?

36.1 NPE would urge the Government, in developing its strategy and future scheme to consider the needs of **all pollinators** and not just those of bees.

36.2 Given the threat posed by climate change and from invasive species, we believe there continues to need to be a role for central Government in addressing biosecurity. The Government needs to ensure biosecurity is embedded into new systems, right from the farm gate along the entire length of supply chains.

37. 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?

37.1 We believe there continues to need to be a role for Government especially during national crisis e.g. Ash Die back, Foot & Mouth both for research and control / enforcement. There may be a role for the new environmental monitoring agency here too.

38. 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?

39. ANM Group provides members and customers with the infrastructure, skills and systems needed to trade their livestock, goods and services openly and fairly. Profits are used to sustainably grow and develop the business.

38.1 No comment.

Section 12 Ensuring fairness in the supply chain

40. 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)?

41. What are the biggest barriers to collaboration amongst farmers?

41.1 From our experience of liaising with farmers over many years, we would identify a number of barriers to collaboration. These include:

- an independent mindset;
- competitiveness and lack of confidence;
- fear and suspicion;
- the average age of the majority of farmers in the uplands;

- past support mechanisms that negated the need for farmers to work collaboratively;
- lack of time to spend away from work on the farm because most farms have already cut back to the bare minimum of labour; and
- the challenges of marketing and access to markets.

41.2 NPAs have, been behind some **excellent initiatives to support farmer collaboration**, such as for example the Exmoor Hill Farm Network, Dartmoor Farming Futures, or the South Downs Farm Clusters.

42. 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?

42.1 The benefits of increased collaboration are many, but include increased knowledge, skills and trust with elements of the supply chain working together rather than against each other. It can help reduce the monopoly of supermarkets. At present, there are examples of livestock being reared in our northern National Parks that then have to be sent to abattoirs in Wales for killing and processing; before being packaged and distributed throughout the UK. This contributes to increased lorry traffic, pollution, and goes counter to increased animal welfare objectives.

42.2 The Government can help, by:

- incentivising local processing, adding value and point of sale rather than everything being centralised;
- more vigorously supporting training in developing, marketing and branding products, particularly those which can demonstrate provision of public goods as part of their creation e.g. beef from native breed cattle which create diverse grassland habitats, gin from juniper habitat creation etc.; and
- helping new entrants into the industry.

Section 13: Devolution

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

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

43.1 No comment.

Section 14: International Trade

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

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

46. 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?

44.1 No comment.

Section 15: Agriculture Bill

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

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

47.1 NPE broadly supports the proposed powers in the Agriculture Bill. In particular we support the principles of:

- Stripping out unnecessary bureaucracy and strengthening delivery.
- Protecting, conserving and enhancing the environment.
- Supporting rural communities.
- Ensuring animal and plant health.

47.2 As we have highlighted elsewhere in our response, NPE believes the Bill provides an opportunity to give greater emphasis on the protection of the broader rural landscape, its heritage and the skills needed to maintain these essential qualities.

47.3 It is essential that the Bill provides a framework for local delivery.

For Further information

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NPE
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