

A review of land management actions under Axis 2 of the Rural Development Plan for Wales 2007-13: Submission by the National Trust Wales

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Summary

The National Trust believes this review is an important opportunity to promote sustainable land management, and establish schemes which are better suited to the future challenges facing farmers, wider society and the environment.

Any change in scheme structure will require transitional support to minimise negative impacts, and support farm businesses to adapt.

Sources of financial support beyond Axis 2 are required to deliver the objectives of the Wales Environment Strategy and reward land managers for the public benefits they provide.

1. Introduction

1.1 The National Trust welcomes the opportunity to comment on the review of Axis 2 of the Rural Development Plan for Wales. The Trust owns 50,000 ha of land in Wales which it manages for the benefit of the nation. A majority of this land is farmed, either by the Trust or by one of our 200+ tenants. The Trust is also Europe's largest conservation organisation, managing natural and historic heritage for conservation and public access.

2. Sustainable Land Management

2.1 The National Trust believes it is essential for agriculture to practice sustainable land management in order to safeguard the natural resources on which the industry and wider society depend. We believe that a farm business should be able to secure an income for providing benefits to society in this way.

2.2 Sustainable land management seeks to maximise a range of benefits across an area of land. Experience from across our estate, and our research¹, demonstrates that it is possible to produce food and public benefits such as biodiversity in the same place.

2.3 To deliver sustainable land management, land managers who provide and protect environmental resources should be financially rewarded. The market does not adequately provide such rewards at present so alternative mechanisms are required. This is crucial as increasing food prices create a pressure to intensify production which risks making sustainable land management and conservation an unattractive business option.² The Trust suggests an integrated package of measures to support sustainable land management by making better use of existing income sources such as Axis 2 and securing new sources of income for land management.

3. Current Axis 2 Schemes

3.1 National Trust farms participate in the full range of Axis 2 Schemes, and we also work with a number of farm tenants who are in agri-environment schemes.

3.2 We are concerned that the ability to deliver environmental outcomes is at present restricted by the funding available for Axis 2. Demand for Tir Gofal outstrips supply; many of our tenants have faced lengthy delays in entering the scheme. The recently announced budget reallocation³ will further restrict access to agri-environment schemes and subsequently the environmental benefits delivered. The condition of many environmental resources is currently poor; investment is required to reverse this then maintain the improved condition. This will require income sources beyond the Rural Development budget. The National Trust believes a range of existing funding could be redirected to support land management.⁴

3.3 In our experience, agri-environment schemes have delivered multiple benefits, particularly by increasing farm biodiversity and helping conserve features of the historic environment. Whilst monitoring of schemes has latterly been introduced, it will take time for trends to be identified, particularly as habitats take time to respond to management changes.

3.4 However, the schemes were designed prior to the Wales Environment Strategy and the clear objectives it sets for the Welsh environment. Current schemes also fail to address key legislative drivers such as the Water Framework Directive and the challenge of climate change. We agree that the current land management schemes deliver only partially against the range of environmental objectives now identified.

3.5 Axis 2 is a unique facility for conservation of the historic environment given the huge proportion of Welsh land which is under agricultural use. Tir Gofal makes a vast difference to the historic environment because of the whole farm approach and potential to address a range of environmental issues.

3.6 At present, Tir Gofal and Tir Cynnal both include objectives for landscape protection and conservation of historic features. Our experience and anecdotal evidence convinces us that the schemes are delivering improvements to the historic environment. This has not been monitored and no data on the impact is available. There is an urgent need for historic environment indicators and outcome

monitoring.

3.7 Capital payments available through Tir Gofal have benefited the historic environment, especially through work on vernacular buildings. These buildings are a vital part of the landscape and lack the regulatory protection offered other historic features such as listed status. As well as enhancing the landscape, these buildings can deliver direct economic benefits when adapted for use as farm shops, business premises, processing facilities and tourist accommodation. We believe these capital payments should continue.

3.8 In response to consultation on the future of Tir Mynydd (2006) we accepted that although delivering some public benefits, the scheme has its limitations. We argued that high payment levels are unsustainable in the longer term, and called for a transition period to support farmers to adjust to the proposed reduction in payments. This period would also be used to devise a new, more environmentally focused system of support for upland farmers. We see the current review as an opportunity to deliver this change and to design a package of land management schemes with fully integrated rewards for upland farms.

3.9 We would highlight further weaknesses in the current package of Axis 2 schemes:

lack of flexibility with scheme prescriptions;

stop-start application process for Tir Gofal;

restricted access to Tir Gofal with demand outstripping supply;

the absence of a top-tier scheme to encourage cooperative action or landscape scale environmental enhancements;

lack of prescriptions targeting the full range of environmental impacts such as carbon and water.

4. Aspirations for future Schemes

4.1 We welcome the high level outcomes set out in the consultation document and broadly agree with WAG's assessment of the drivers for change. We welcome the intention to focus on delivering the objectives of the Wales Environment Strategy, and to introduce an ecosystems services approach to land management schemes. The National Trust is working to enhance the environmental services provided by land in our care. For example, the Upper Conwy Catchment Project is seeking to enhance water quality, carbon storage and biodiversity whilst reducing the environmental impact of farm practices.

4.2 It is not clear in all cases how the high level objectives would be delivered by the options presented. We will be keen to ensure that the detailed scheme design fully considers how to deliver the historic environment objectives.

4.3 Greater emphasis is needed on using the schemes to make the wider countryside more favourable to biodiversity. We are concerned that the current priority for designated sites leaves little scope for enhancing biodiversity on other farmed land, or to improve ecological connectivity which is essential for helping wildlife adapt to climate change.

4.4 We would urge WAG to ensure that the new schemes are designed to allow a greater degree of flexibility than is currently possible, allowing a scheme entrant to follow the prescriptions which are best suited to their farm, and which will deliver priorities for that farm environment. Project officers will be central to this, mirroring the approach the National Trust uses. Our specialist farm advisers work with tenants to help them identify opportunities to benefit both the farm business and the environment.

5. The Options

5.1 The National Trust believes that the structure of schemes outlined in Option 2 offers the best basis for the design of future Axis 2 schemes. It requires development and we do not agree with all elements of the proposal, but we recommend that this option be taken forward and developed with stakeholders into a detailed scheme design.

5.2 The advantage of this option is that it has a relatively simple structure, with its similarity to the current agri-environment pyramid offering a degree of familiarity. It offers the potential to address a wide range of environmental objectives and to target priorities in a particular location. We would expect this option to offer universal access to a land management scheme; this will be essential to ease the transition from the current support system.

5.3 It is not yet clear to what extent Option 2 would result in redistribution of funds, but any change in scheme structure will have repercussions. This is acceptable in order to achieve a more sustainable system, providing sufficient support is in place during the transitional period. We do not expect that there would be any need to introduce further changes to the scheme structure for the foreseeable future.

5.4 We expect WAG to model the impact of any proposed restructuring of Axis 2 to understand the impacts and plan measures to mitigate them. This should include advice and training to assist farmers in restructuring their business. Experience from England demonstrates that upland farms are particularly vulnerable to changes in financial support systems, and are likely to require assistance to restructure. WAG should consider how funding from other parts of the Rural Development Plan and Common Agricultural Policy can be used to ease the transition.

5.5 It will also be important to provide a path for those currently in agri-environment schemes to access new schemes. This will ensure that those farmers who have already embraced sustainable land management can continue to do so, whilst ensuring that environmental improvements secured to date are not lost. In our experience, training, skills development and advice are essential in supporting land

managers to deliver a range of objectives.

5.6 We welcome the intention to test climate change adaptation methods through the advanced element of option 2. Research commissioned by the Trust and endorsed by the Pitt Review confirms that land management can beneficially contribute to reducing flood risk. At a small catchment scale (less than 100 km²) land management has a quantitative impact on runoff and can be used as part of an integrated approach to flood management and defence. Our research found that the observations which show that land management does have an affect on runoff, are applicable to 97% of England and Wales.⁵

5.7 The advanced element could usefully target activity on common land. We recommend WAG consider how the new scheme can improve the management of designated sites on common land, and work to ensure that this is not impeded by delays in implementing the Commons Act.

The National Trust Wales

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1. 'Green Spaces - Measuring the Benefits' University of Essex for the National Trust 2008 <http://www.nationaltrust.org.uk/main/w-green-lungs.pdf>
2. Sustainable Farming and Environment- Action Towards 2020, Vision 2020 Group 2007
3. Ministerial Statement 22 October 2008 <http://new.wales.gov.uk/news/latest/081022organicfarming/?lang=en>
4. Nature's Capital, The National Trust Wales 2008
5. Land Management and Flood Risk Evidence for the Pitt Review 2008, The National Trust 2008