

Defra consultation: Implementation of CAP reform in England

Landscape Institute response, 28 October 2013

The Landscape Institute

The Landscape Institute is the Royal Chartered body for the landscape profession. As a professional organisation and educational charity, we work to protect, conserve and enhance the natural and built environment for the public benefit. The Landscape Institute represents 6,000 landscape scientists, planners, architects and managers. We champion multi-functional and sustainable landscapes of both town and country. We believe that through careful and appropriate planning, design and management, it is possible to deliver a wide range of environmental, social and economic benefits.

The Landscape Institute, in accordance with the European Landscape Convention, uses the term 'landscape' to refer to "...an area, whether outstanding or degraded, whose character is the result of the action and interaction of natural and/or human factors." It is an all embracing term that covers a wide range of landscape types, including green spaces, civic squares, housing development, coastlines and agricultural land.

The Landscape Institute response

We welcome the opportunity to respond to this important consultation on the implementation of Common Agricultural Policy (CAP) reform in England. We believe that the current reforms provide a real opportunity to reassess our approach to the countryside and deliver improved outcomes for the economy, the environment and wider society.

Our response is divided into two parts. The first outlines a number of strategic observations and recommendations that fall outside of, but are highly relevant to, the questions contained within the consultation document itself. These are intended to be constructive and help contribute to related Government objectives such as those detailed in the Natural Environment White Paper. The second part details our responses to the specific consultation questions.

The Landscape Institute response – strategic comments

a. Transparency for the taxpayer and a Vision for the Countryside

We welcome the Government's commitment to transparency for taxpayers, as articulated in paragraph 1.9 of the consultation document. However, despite huge investment into farming by all layers of government, there is no clear articulation of what that investment is seeking to achieve. Successive governments have failed to provide an overarching Vision for the Countryside, despite a fragmented 'plan' existing by default, as a result of various public interventions already in place which influence significantly the way our land is managed.

The Landscape Institute believes that the new greening objectives outlined in the CAP reform proposals represent such a significant shift from current practice in the farming industry that an overarching plan, or Vision for the Countryside, is necessary.

We recommend that such a Vision should be based upon the National Character Areas map for England – work undertaken by Natural England to divide the nation into 159 distinct areas. As stated on Natural England's website:

“Each [character area] is defined by a unique combination of landscape, biodiversity, geodiversity and cultural and economic activity. Their boundaries follow natural lines in the landscape rather than administrative boundaries, making them a good decision making framework for the natural environment

“As part of its responsibilities in delivering the Natural Environment White Paper, Biodiversity 2020 and the European Landscape Convention, Natural England is revising its National Character Area [NCA] profiles to make environmental evidence and information easily available to a wider audience.

“NCA profiles are guidance documents which will help to achieve a more sustainable future for individuals and communities. The profiles include a description of the key ecosystem services provided in each character area and how these benefit people, wildlife and the economy. They identify potential opportunities for positive environmental change and provide the best available information and evidence as a context for local decision making and action.

Our recommendation for a Vision for the Countryside, founded upon the National Character Areas map for England, is driven by a number of factors:

- Enabling delivery of the ‘landscape-scale’ approach, as articulated in paragraph 5.25 of the consultation document which states that:

“...our approach will be to look for the maximum opportunities to achieve multiple benefits through the same investment, for example, investments in water quality that will also benefit biodiversity, or landscape scale projects that deliver multiple benefits. Through such an ‘ecosystem approach’ the new scheme will be better focused on those areas which offer the better opportunities to secure these outcomes.”

- Land use planning is treated separately and differently for urban land and the countryside. For urban land, and the urban fringe, the public agenda is set out spatially having undergone extensive public consultation and involvement. For the countryside there is an agenda but it is fragmented across numerous ‘portals’ and is only partially spatial, for example, protected landscapes such as National Parks. The process for defining and setting the agenda is not clear and the mechanisms for achieving the agenda are dispersed across several interventions, for example, through regulation by numerous bodies, through tax relief, through conditioned incentives and advice. This is not an efficient way of planning for the way our land is used and managed.
- There remains a gulf in understanding between the general public and the farming community, the lack of clarity in what the public investment into farming is trying to achieve only exacerbates the negative relationship between these two communities. Our Vision for the Countryside would be designed to guide delivery by both the public and private sectors and would enable scrutiny by the taxpayer.
- The National Character Areas map has failed to attract the attention it deserves because it is frequently, and incorrectly, assumed that it only concerns the visual aspects of land. There is a widespread failure to appreciate the direct link between landscape character and sustainability. National Character Areas map records the residue of the resulting landscape which has evolved from the interaction between natural systems and farming. The ‘residue’ is left over from farming before the industrialisation of the industry including the radical introduction of agricultural chemicals. These systems have had the power to generate even rates of food production whatever the variations in natural characteristics. They have often worked against

natural systems at huge cost to the quality of the countryside. There is plenty of evidence that adequate production levels can be achieved through an ecosystems services approach to agriculture. The National Character Areas map draws together areas of similar baseline characteristics and could provide the framework for setting a new vision for sustainable farming, a framework for public intervention and a framework for the farming industry to respond. By drawing together areas of similar natural characteristics the targeting of policy and action would be very efficient, and highly relevant to local landscape character.

- A Vision for the Countryside, rooted in the National Character Areas map, would demonstrate a strong and lasting commitment by the Government to its obligations under the European Landscape Convention (ELC). In particular, the approach we advocate would go a long way towards delivery of the following articles of the ELC:
 - Article 5 (b) To establish and implement landscape policies aimed at landscape protection, management and planning through the adoption of the specific measures set out in Article 6;
 - Article 5 (c) To integrate landscape into its regional and town planning policies and in its cultural, environmental, agricultural, social and economic policies, as well as in any other policies with possible direct or indirect impact on landscape'; and
 - Article 6 (e) To put landscape policies into effect, each Party undertakes to introduce instruments aimed at protecting, managing and/or planning the landscape'
- Such a Vision for the Countryside, if found on the National Character Areas map, would contribute significantly towards achieving some of the aspirations set out by the Rt Hon Owen Paterson in a speech delivered at the Policy Exchange on 20 November. The Secretary of State spoke about the need to work with the 'grain of nature and society'. This is precisely what landscape character, and the National Character Areas map, is about – the interface between natural and human systems.
- A new approach to the countryside, with landscape character at its heart, would help protect and enhance valuable tourism assets, important components of the rural economy. It would also help retain and enhance social stability and a sense of place, given the strong connection between rural economies and their local landscapes.

b. Public subsidy

The Landscape Institute recognises that the Government is clear that it wants to see "...a competitive farming industry that faces less red tape and is less reliant on public subsidy." (paragraph 1.6 of the consultation document). However, we are seriously concerned that allowing market forces to drive decision making could have detrimental impacts on the quality of our countryside. We suggest that until the Government is able to quantify, in financial terms, the value of the full range of ecosystem services to be derived from the countryside, we cannot run the risk associated with a market driven countryside. Consequently the Landscape Institute supports ongoing public intervention with an emphasis on collaboration and financial support with regulation to act as a back stop. Government must remember that one of its overarching, and laudable, commitments in the Natural Environment White Paper:

"The Government wants this to be the first generation to leave the natural environment of England in a better state than it inherited."

c. All Farms

Under the title 'A New Environmental Land Management Scheme' the Government announces its intention to scrap the universally available Entry Level Environmental Stewardship Scheme. You will recall that the Entry Level came out of the principles set out by Sir Don Curry when he pointed to the need for a broad/shallow scheme to cover as many farms as possible, the published target was achieved at 70%. See page 9 paragraphs 1.17 and 1.18. The Landscape Institute accepts that ELS needs improvement and proposes that its public benefits align with '*positive environmental change*' as set out in the National Character Areas map framework. The new scheme will reach between 35-40% by focussing on SSSIs or on specific targets, the Government is drawing back from targeting the wider countryside. In principle the Landscape Institute wishes to state very clearly that all land should be managed sustainably and in accordance with sound environmental principles. If there are environmentally based funding streams available, designed to support positive management, then all land should be able to access it. The Landscape Institute supports the reference to operating public intervention at a landscape scale.

d. Administration

The public administration of the countryside is very complex including the European influence, various Government departments and their agencies, such as the Rural Payments Agency, Natural England, Environment Agency and English Heritage, administering national policy alongside a variety of departments from local government. Over the years local government have inherited numerous responsibilities such as food standards, animal health, animal welfare, rights of way, biodiversity and the historic environment. There is both duplication and conflicting objectives within the current system of administration. The number of public bodies and agencies do lead to a lack of clarity for the public sector, the farming community and the wider public as to who is doing what and what they are trying to achieve. A clear statement of intent by the Government, focussing policy outcomes objectives on specific areas of land is an essential start to streamlining the current administrative systems.

The Government ought to clarify the relationship between the existing cross-compliance conditions under the Single Farm Payment – GAEC and SMR with the new conditions being introduced under the Greening programme.

e. Greening and sustainability

In 2011 the Landscape Institute responded to the consultation announcing the Review of the CAP and in its closing remarks urged the Government to ensure that Europe placed a new emphasis on sustainable systems of food production. It is disappointing that the Review of the Common Agricultural Policy by Europe has failed to acknowledge the need to reposition the industry to being more sustainable. On page 10 of this consultation there is reference in paragraph 1.20 to resilience and elsewhere support is given for nitrogen fixing plants. Although sustainability is implied there is no clear directional change in support of sustainable systems. The Landscape Institute wishes to re-emphasise the need to adopt systems to support the farming industry to become more sustainable. Since the last review of the CAP the Government have placed energy security high up on the agenda emphasising the need to keep the lights on and retain our level of mobility at the same time reduce our reliance on fossil fuels and carbon emissions. Although food security is now firmly on the agenda the extent to which farming is reliant on fossil fuels is not being flagged up as an issue. We need to remember that almost all the nitrates we use in agriculture emanate from natural gas. Biodiversity intervention systems often focus up the food chain to birds, there is very little emphasis given to the biodiversity of our soils and there is plenty of evidence to suggest that agricultural development

such as chemical stimulants and oppressors have abandoned the natural replenishment characteristics of our soils. An audit of the carbon content to our soils will point to a further weakness at a time when mechanistic systems for carbon sequestration fail to meet expectations pointing to opportunities for soil related natural systems to provide one of the answers. Greening of Pillar 1 needs to concentrate on improving the biodiversity of soils and move agricultural systems to being more sustainable, we welcome the measures set out in the consultation on this topic however they appear fragmented and lacking conviction.

The Landscape Institute response – responses to consultation questions

1. Do you support the principle of moving to more equal rates of payment across the three payment regions?

- **Option 1: No change in the current regional distribution;**
- **Option 2: Uplift in upland direct payments (with modest reductions to lowland direct payments); or**
- **Another option**

The Landscape Institute support the increasing share of direct payments to the uplands.

2. Do you support our preferred option that we should apply the minimum level of reduction possible? If not, what level do you think should be applied?

- **We should apply the minimum level of reduction possible (5% on receipts over €150,000);**
- **We should apply a higher rate of reduction but less than 100% (please explain what reduction you favour); or**
- **We should make €150,000 the most any farmer can receive – this is the maximum reduction possible.**

The Landscape Institute supports the Government's preferred option. The Landscape Institute rejects the concept of reducing subsidy across the board because too many of the products of farming cannot be adequately valued in traditional cost benefit analysis terms and the farming industry needs to move towards a more sustainable system of land management.

3. Do you support our preferred option that we should not implement salary mitigation? Please explain your response.

- **We should not adopt salary mitigation;**
- **We should not adopt salary mitigation, provided that the rate of reductions is applied at the minimum rate of 5%; or**
- **Salary mitigation should be allowed.**

No response.

4. Do you support our preferred option not to implement redistributive payments as an alternative to reductions?

- **We should implement redistributive payments; or**
- **We should implement redistributive payments instead of reductions.**

No response.

5. Do you support our preferred option not to extend the list of ‘negative activities’ forming part of the active farmer test?

- ***The negative list should not be extended; or***
- ***The negative list should be extended.***

The Landscape Institute supports the policy of not extending the negative list of activities. The Active Farmer test will need to avoid penalising non-farming organisations such as the RSPB, Wildlife Trust and the National Trust where the bulk of income comes from membership, not farming. In its negotiations with Europe the UK Government ought to consolidate support for farming, not the farmer, support for whoever undertakes the farming. The detailed financial arrangement between the land owner, the tenant or contractor or partner will vary the final receiver of such payments.

6. We must set a limit on the number of entitlements that can be claimed under the Young Farmers Scheme which must be between 25 and 90. What do you think should be the ceiling that can be claimed by an applicant to this scheme?

- ***A limit of 25 entitlements (the lowest possible limit);***
- ***A limit of 54 entitlements (the average farm size in the UK);***
- ***A limit of 90 entitlements (the highest limit possible); or***
- ***Another option.***

Our preferred option is not to require those seeking to participate in the Young Farmers Scheme to meet additional eligibility criteria. Do you agree?

- ***We should not add additional criteria; or***
- ***We should add additional criteria.***

Do you have any other comments you would like to make on the issues addressed in this section on the implementation of direct payments.

No response.

7. The Government is not minded to take up the option to implement greening through a National Certification Scheme containing additional, equivalent measures. Do you agree with this approach or do you see a case for a National Certification Scheme and, if so, on what grounds?

The Landscape Institute supports transforming the agricultural industry to become more focussed on being sustainable. A national change is needed and the Landscape Institute proposes a clear vision for the countryside and sustainable food production, articulated at a landscape scale and responded to by the farming industry in the long term by an individual Whole Farm Plan for each holding. In the short to medium term for that response to be set out briefly in two pages of A4 prepared by the farmer.

8. Do you agree that this approach to the implementation of greening in England strikes the right balance between environmental benefit and administrative cost, in the context of our approach to the CAP Reform package as a whole?

Making available the full list of proposed Ecological Focus Areas (EFA) options would include the EFA requirement to be met without the need for additional action. However, individual EFA options may realise differing levels of environmental benefit. Which selection of EFA options do you favour?

There is a particular interest to see benefits of pollinators arising from the implementation of greening. Are there any practical EFA options, or enhancements of these options, which could easily be adopted, have a high likelihood of uptake and which would be particularly beneficial for pollinators? Would these options be deliverable within the approach set out in the direct payments Regulation or would they need to be implemented through a National Certification Scheme?

We note that the Government has decided that greening should adhere to the direct payments Regulation but fails to state if these are to be revised. If they are not then the opportunity for the new greening element to the CAP to bring any significant improvement will be lost, and this would in our view be unacceptable. These new measures are very significant to the public interest and they earmark considerable funds. As such, there is a need for the UK Government to restructure the current relationship with the farming industry by clarifying the public agenda at the landscape scale and this should involve a requirement for a Whole Farm Plan to form the basis of a contractual undertaking for delivery of public goods and services, including sustainable food production.

With regards to crop diversification, it is not clear from the consultation whether integrated crop management systems could be taken as two crops, a main crop and a nitrogen-fixing crop. It could be argued that they are separate crops because in most cases the main crop draws on the previous year's nitrogen-fixing plants. In which case there would be huge environmental benefits including non-use of fossil fuels and gains for invertebrates.

With regards permanent grassland, Natura 2000 sites are already protected so greening should accept this and direct protection to Sites of Importance for Nature Conservation which are of national importance but have no statutory protection.

With regards to Ecological Focus Areas, there is a possibility that 5% of all existing arable farms are already not being cultivated because of existing features such as hedges, woodlands and verges. The Government should be seeking a net gain as a result of this new greening measure and should direct the options to comply with what is appropriate to each landscape type.

9. Are there any current GAECs that you think should not be carried forward and included from 2015? If so, what are your reasons and evidence for this? Are there elements within any GAEC that you think should or could be changed, implemented better, or excluded? If so, why?

No response.

10. What lessons can be learned from the current Rural Development Programme? How can we build upon its successes?

When offered by the programme there is a widespread commitment from the farming community to engage in environmental management of the wider countryside, with a 70% uptake in Environmental Stewardship. The new programme should set a new target of 90%.

11. Are there any key areas we have missed in our assessment of need to support the new Rural Development Programme? Are there any further sources of evidence of social, economic and environmental need in rural areas for England that have not been captured?

There is a new imperative to transform food production to being more sustainable by harnessing the power of natural systems, in particular the restoration of the biodiversity of soils to become less reliant on fossil fuels.

12. Are the areas we outline for support under the new Rural Development Programme set out above the right ones? How can we best target investment under the new Rural Development Programme to help gain maximum value for money for UK taxpayers?

Priority for investment through the Rural Development Programme ought to include Priority 5 – Promoting resource efficiency and supporting the shift towards a low carbon and climate resilient economy in agriculture, food and forestry sectors.

13. How might we make the process for applying the Rural Development funding simpler or less bureaucratic? How might this be balanced against the need to ensure clear accountability for public funds?

No response.

14. What are your views on the structure of the proposed new environmental land management scheme, in particular the new 'landscape-scale' approach?

We strongly support the new 'landscape-scale' approach to the environmental land management scheme, and urge Government to make best of the work undertaken by Natural England on Landscape Character Areas (see pages 1 and 2 of our response). This should provide the strategic framework for administration of the scheme and should be open to anyone to apply but could also include by invitation. However, we do have the following comments on the proposals:

- We believe that the proposed scheme is far too narrow, given that it is aiming at 35-40% of land. The aim should instead be to include more than the 70% currently within the Environmental Stewardship programme;
- We also believe that the scheme should not be confined to targeting SSSIs but should include Sites of Importance for Nature Conservation (SINCs) as identified by the Local Plan process;
- The scheme should include supporting the elements of the landscape that make up the character of that part of the countryside, including boundary treatments, trees and woodlands;
- The scheme should actively support the capital changes to encourage a return to mixed farming;
- Agreements should run for 10 years or preferably longer, not the 5 years being proposed;
- The new environmental land management scheme should be targeted at specific National Character Areas;
- Advice and guidance should be provided by Natural England but include the development of online guidance. These scheme could include an element of capital grant for the paying of professional fees;
- The schemes entry requirement should be above statutory obligations as enforced through GAEC and the SMR conditions.

A good example of the need to work schemes at a landscape scale with reference to water – the initiative to transform the agriculture industry to produce clean water is welcomed, however there are examples where agricultural processes have caused the water companies to import water to dilute drinking water because of nitrate leaching into aquifers – an example are the coastal urban conurbations adjacent to the South Downs National Park. Millions have been spent on the infrastructure to enable the blending to occur. Water rate payers have had their charges increased

to fund this infrastructure. Clearly it would have been more cost effective to pay farmers to produce clean water as a result of their farming techniques. Again this intervention is better funded annually and not through short term agreements or capital funding. A shift in perpetuity is needed.

15. Do you agree that we should not be prescriptive about how groups of farmers or land managers could be brought together to deliver landscape-scale agreements under the proposed new environmental land management scheme? How could we help facilitate landscape-scale approaches under the proposed new environmental land management scheme?

The Government should not be prescriptive about how groups of farmers could be brought together but it must be clear, spatially, what the public sector vision for the countryside is. Clarity in the vision for a multi-functional countryside, including a more sustainable food production system, set out within the National Character Map framework to which the private sector is encouraged to respond is the best way of helping to facilitate a landscape scale approach.

16. Should we offer a capital only grant as part of the proposed new environmental land management scheme?

No, capital grants are needed for one-off capital works but for on-going management incremental annual payments are essential. We welcome the proposed capital grant scheme for the wider countryside. We recognise that the consultation proposes capital grants in support for shifts towards a low carbon economy, and we welcome this. However for such a shift to be sustained it must be mainstreamed through Pillar 1, through annual per hectare payments.

17. Do you agree with the principle that five year agreements should be the norm under the new environmental land management scheme? What approach should we take to targeting the new environmental land management scheme?

No, sound environmental approach to land management has to be secured for the long term. The current system of a 5 year break clause maybe necessary but a public sector commitment of at least 20 years will give the farming community the confidence that the Government is in it for the long term.

18. With the exception of the highest priority sites, is there a case for making advice and guidance available increasingly online or through third parties under the new environmental land management scheme?

As far as possible the aim should be to empower the farming community to access the best advice electronically, however the Landscape Institute suggests that Natural England staff should be available to help, within limits, as the farming community moves towards becoming more sustainable and committed to higher environmental management standards.

19. Where should we set the scheme entry requirements (i.e. above the legal baseline) for the proposed new environmental land management scheme?

Entry to the scheme should be above the legal baseline. However a review is needed to ensure that the balance between regulation and incentives is about right, the overall objective of collaboration through agreement rather than heavy weight regulation being enforced is supported. Banishing regulation to a safety net status is preferred.

20. Have we identified the right areas of support under the new Rural Development Programme to help improve the competitiveness and efficiency of the farming, forestry and other land-based sectors? Are there any other areas which could be supported? What activities to support the farming, forestry and other land-based sectors under the new Rural Development Programme would provide the best value for money for the UK taxpayer?

No response

21. How should we support advice and skills for the farming, forestry and land-based sectors under the new Rural Development Programme?

The Government should set out a Vision for the countryside to demonstrate its ambitions for a multi-functional and sustainable approach to land management, to set out what financial capital support is available to assist the private sector in achieving the vision.

22. How can we ensure any advice provided to the farming, forestry and other land-based sectors and through the new environmental land management scheme is integrated and linked with advice provided within the industry in light of the Review of Advice and Partnership Approaches?

The Government should set out a Vision for the countryside to demonstrate its ambitions for a multi-functional and sustainable approach to land management, to set out what financial capital and revenue support is available to assist the private sector in achieving the vision.

23. How do we ensure innovation is considered across the breadth of the new Rural Development Programme? How could we develop proposals for an England specific European Innovation Partnership to support this?

No response.

24. How can we strengthen LEADER's contribution to delivering jobs and growth in rural areas? How can we make the LEADER approach more effective and deliver better value for money?

No response.

25. What role could loans or other financial instruments play in delivering the Rural Development Programme?

No response.

26. Should we transfer funding from Pillar 1 to Pillar 2? If so, should we transfer the maximum 15% or less? If less, what should the Rural Development Programme fund less as a result?

- **Environmental land management;**
- **Rural economic growth;**
- **Farming and forestry competitiveness and productivity; or**
- **Other, please specify**

RDP funding can improve the rural environment, improve the competitiveness of the farming sector and productivity of the forestry sector, support growth in the rural economy, and

strengthen rural communities. What priorities should we spend RDP funding on? What proportion of RDP spend should we apply to:

- ***Environment – agri-environment and forestry;***
- ***Farming competitiveness and forestry productivity; or***
- ***LEADER***

Transfer of 15% of Pillar 1 to Pillar 2, argued on the basis that Pillar 2 delivers public goods in a way that direct subsidy under Pillar 1 cannot, is an admission that we are not spending £2bn a year through Pillar 1 in the best way possible. If the Government restructured the administration of Pillar 1 to quantifying the desired outcomes to be delivered through a Whole Farm Plan supported by direct subsidy then Pillar 1 would be less onerous administratively than the current system under the Rural Development Programme.

Each review erodes Pillar 1 and as the pot becomes smaller so the significance of the income to the farmer reduces and there will come a point that might see farmers opting out of the scheme which will result in the loss of leverage to influence the way land is managed. Pillar 2 is seen as the best mechanism for delivery of public goods, however this is largely due to the way the UK has chosen to administer the two funding sources. If, as we have suggested previously, there was a clear Vision for the Countryside drawing together the plethora of conditions and articulating them spatially to enable the farming community to see clearly what is being asked of them and to prepare a Whole Farm Plan as their response on which the Single Farm Payment is paid then this would be the optimum mechanism. It would be clear to the public, it would provide ongoing annual payments in support of income and it would be cheaper to administer as it could be done through one government agent rather than the layers of public bodies that are involved today.

The Landscape Institute does not agree that environmental outcomes are best delivered through Pillar 2. We believe that mainstreaming sustainable farming and environmental standards into Pillar 1 is a priority, supported by targeting of special areas under Pillar 2. The Landscape Institute proposes that the UK Government establish a plan for each National Character Area, on which a great deal of work has already been undertaken by Natural England, where the new greening provision requires individual management plans for each farm forming the basis of a public goods delivery contract in exchange for annual per hectare payments. However such plans need to be specified in such a way that empowers the farming community to write the management plan themselves, starting in the first instance, by setting out the relevant objectives and what will be done on two sides of A4 paper.

Areas of Focus under the new Rural Development Programme – Priorities 4 – Restoring, preserving and enhancing ecosystems related to agriculture and forestry and 5- promoting resource efficiency and supporting the shift towards a low carbon and climate resilient economy in agriculture, food and forestry sectors, as set out in annex C, ought to be mainstreamed into the Greening of Pillar 1 rather than banished to compete with social and economic funds within the Rural Development Programme.

27. Do you agree that we should not introduce a requirement for written contracts between producers and processors/distributors at this stage? Do you agree that we should not make it possible for producer organisations and inter-branch organisations to be formally recognised in additional sectors of agriculture? Do you have any comments on this approach or any of these assumptions?

No response.

28. Do respondents agree with the main conclusions of the analysis in the CAP reform evidence paper and in the RDPE Impact Assessment? Are there any important impacts of the CAP implementation package that have been overlooked? Are there any key inputs or assumptions where better evidence is available?

No response.

Closing Remarks

The Landscape Institute appreciates the complex challenge being faced by the Government in meeting the objectives of the reform of the Common Agricultural Policy. However we believe that the Reform creates an opportunity to help reposition the farming industry to become more sustainable and to rise to the new imperative for achieving a multi-functional countryside for the wider public benefit. It is also an opportunity to reconnect the wider public with farming by removing suspicion and uncertainties that currently create unnecessary tensions between the two. It is also an opportunity to simplify the level of public administration and intervention systems.

The Landscape Institute would welcome the opportunity to develop further the ideas put forward in this response, in particular our recommendation concerning the development of a Vision for the Countryside, based on landscape character and the framework provided by the excellent National Character Areas mapping work undertaken by Natural England.