

Health and Harmony: the future for food, farming and the environment

Response from the Landscape Institute

8 May 2018

Introductory comments

The UK's departure from the Common Agricultural Policy represents a major opportunity to improve our landscapes and people's relationship with them.

There is much in the command paper that is very positive. We support the essential principles underpinning this work, most especially that public money should be spent on delivering public goods.

However, it is essential that the level of ambition on funding and coverage remains high. This means:

1. The UK's exit from the EU should not lead to a reduction in the overall financial envelope for the achievement of positive environmental outcomes, at least for the period of the 25-year Environment Plan.
2. The new scheme(s) must have the ambition to improve a much greater extent of land than currently, and therefore to target investment where it will deliver the greatest benefits. This will mean ensuring that the scheme is open and appealing to anyone who owns or manages land, and increasing uptake amongst smaller farms, particularly in areas fringing towns and cities.
3. That any transition period begins with a fixed end date, after which point no public funds will support farming practices that lead to a decline in the quality of the natural environment.

We support the proposed transition period to move from the existing system to the new. The UK¹ must use this period to test, design and deliver the best system for improving our agricultural landscapes. Whilst there must be ongoing refinement after this period, the

¹ Although agriculture is a devolved policy, in this response we refer primarily to 'UK' rather than 'England'. This recognises that the principles set out here will inform the creation of parallel national schemes, and that the precise devolution of powers that will shape those schemes is still being determined as part of the withdrawal process.

underlying principles should be put on a long-term statutory footing, to ensure there is no erosion of the standards on public money for public goods.

Key recommendations

These recommendations relate to the outline of the programme contained in the command paper. Further responses to specific chapters/questions are in the section below.

- It is **not possible to select a ranked list of environmental outcomes** at the national level, and government should not attempt to use the findings of this consultation to do so. The consultation questions at Chapters 5 and 6 create a misleading impression that environmental outcomes are discrete and unconnected. A blanket national approach can only cover the most fundamental compliance rules; payments for outcomes must have a more nuanced system for deciding priorities.
- Although it is unhelpful to rank them in this way, this does not mean that all of the listed environment outcomes are equivalent. All the listed outcomes are interlinked, and **priority should be given to those with the greater causal effects**. For instance: soil health underpins the achievement of many other outcomes and would rightly be a priority in many areas. Existing causal frameworks (e.g. the Millennium Ecosystem Assessment) can provide evidence to set priorities.
- Any new Environmental Land Management (ELM) scheme(s) should **take a localised landscape-led approach**, which can target the achievement of different outcomes in different areas, towards the improvement of landscapes as a whole. This will not only be the best use of resources, but also enable a greater degree of local ownership and public accountability. An enhanced landscape, in its holistic sense, is not a discrete outcome like clean water, healthy soils, etc. but rather the *result* of those outcomes. Landscape is the combination of natural and cultural factors, which together form the recognisable character of a place and to which people connect. Articulating the programme at this scale will be vital for public buy-in.
- The targeting of environmental outcomes should be achieved sub-nationally through a **landscape-led spatial framework**, and must rely upon existing arrangements where they exist. The main architecture for this should be the National Character Areas (NCAs), developed and published by Natural England. These set the context for local, partnership-based delivery, and the existing Statements of Environmental Opportunity (SEOs) ought to be used as a starting point for local conversations, for instance with Farm Clusters. The NCAs can be grouped into broad landscape types where it makes more sense to work at a larger scale, and likewise disaggregated where there are existing functional designations and partnerships: e.g. National Parks or AONBs. Other models, like Joint Advisory Committees, Conservation Boards, Catchment-based Approach Partnerships, Local Nature Partnerships, Local Economic Partnerships, etc., provide examples of how this can work in practice: but the approach must be landscape-led.

- Any new ELM **investment within protected landscapes** should have a clear link to the policies set out Management Plans, and – eventually – vice versa. Our designated landscapes cover 23% of the countryside² and will play a key role in the facilitation of environmental outcomes at a landscape scale. The administrative bodies have a statutory responsibility to produce Management Plans, and these must carry weight if they are to be meaningful. The recent approach set out by Exmoor National Park³ is an example of good practice which ought to be piloted as part of a transitional period.
- A proactive approach must be taken to **addressing skills gaps**, which are not limited to those in the farming community, and not limited to those needed to run a farm business. The level of ambition described in the command paper will not be met without investment in skills related to land management.
- The current system of licensing/regulation for **chemicals use** is insufficiently strong, and government should explore the opportunity to address this through future incentives schemes. Ultimately, a more rigorous framework is needed, in order to understand the unintended environmental consequences of large-scale chemicals use, and how these can be managed at a landscape scale.⁴ Until then, incentives schemes must encourage best practice. Public money ought not to support the use of pesticides and inorganic fertilizers which have not been robustly tested for mass-market use, and which threaten the pollution of our air, soil, water and wildlife through widespread use. A transition period (e.g. 10 years) is an opportunity to work with farmers to set higher standards and establish a ‘precautionary principle’ basis for future spend. The work undertaken at EU level on the sustainable use of pesticides must not be lost,⁵ and the UK National Action Plan must be updated and continue to carry weight once we leave the EU.⁶
- Finally, the success of any incentive scheme must not be undone by poorly-aligned **policy in other areas**: planning, wildlife regulations, chemicals licensing, etc. For instance, national planning policy must strike the same balance between environmental enhancement and agricultural resilience: ensuring that farmers can reliably plan for new buildings where they are needed, but making sure that these are sensitive to their surroundings. A more-nuanced approach to Use Classes is needed, for example, which draws a clearer line between industrial and agricultural buildings, and is more attuned to the potential landscape impacts.

² Natural England, Designation Strategy, 2012, <http://publications.naturalengland.org.uk/file/2635576>

³ Exmoor Ambition, 2018, <http://www.exmoor-nationalpark.gov.uk/living-and-working/info-for-farmers-and-land-managers/exmoor-ambition>

⁴ Professors Ian Boyd and Alice Milner have outlined a proposed framework of chemicals licensing for agricultural use in the UK, here: <http://science.sciencemag.org/content/357/6357/1232.full>. ‘Towards pesticidevigilance’, Alice M. Milner and Ian L. Boyd, *Science*, 22 Sep 2017:

⁵ Directive 2009/128/EC, https://ec.europa.eu/food/plant/pesticides/sustainable_use_pesticides_en

⁶ UK National Action Plan for the sustainable use of pesticides (plant protection products), 2013, https://ec.europa.eu/food/sites/food/files/plant/docs/pesticides_sup_nap_uk_en.pdf

Response to consultation questions

Where we have specific comments in response to the consultation questions that have not been addressed as part of the above recommendations, these have been put below.

2. Reform within the CAP

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

The changes made to the current Countryside Stewardship programme will need to lead the way towards a future longer-term approach. We favour the four options outlined: there must be significant simplification of the administrative processes, and a greater use of automated and online processes.

A key aim of this transitional period must be an improvement in transparency and clarity on outcomes for the public. A simplified system will support this. The system would benefit from a clear process of establishing the outcomes locally, long term agreements (e.g. 10 years), and a single point of contact representing the public agenda. The contracts with landowners must be two-way, and ensure that both landowners and government are transparently accountable for failures to deliver on the promised outcomes.

Existing learning from the evaluation of past Countryside Stewardship/Environmental Stewardship programmes is still current, and must be part of this process. Some key insights from those evaluations include:

- The need for better landscape advice and targeting at the local level to achieve landscape objectives
- Stronger targeting of some very rarely used options (e.g. in-field trees, pasture, orchards, ponds, hay meadows)
- The need for better connectivity of options, in swathes/zones/clusters (at the landscape-scale and across clusters of farms)

3. An 'agricultural transition'

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

We support the principle of applying reductions to Direct Payments as part of a transition period.

One of the ultimate aims of any future programme must be the protection and improvement of the UK's landscapes. This necessarily means paying more per hectare. Whilst there are some economies of scale, the largest landholdings will therefore require the largest payments as a result. The profile for reducing direct payments should be directly related to the speed at which a satisfactory alternative system can be implemented, and any cap must ensure that it does not compromise the ultimate aims of the programme.

4. A successful future for farming

What are the priority skills gaps across UK agriculture?

It is disappointing that the skills gaps listed within this chapter do not encompass a broader range of skills linked to land management. Achieving the ambition of this command paper will require investment in skills beyond those managing farm businesses, and in a much broader range of skills linked to land management and other landscape professions.

There is opportunity for sectors to work together on greater provision of skills development, as well as guidance and signposting. For instance, guidance produced by our organisation, and others such as the Forestry Commission, has been used to support the delivery of outcomes under the existing Countryside Stewardship schemes: but rarely has any of this guidance been written specifically for this purpose. The government could usefully bring sectors and organisations together on this and play a brokering role.

5. Public money for public goods

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

Our key recommendations on the proposals in Chapters 5 and 6 are set out above.

Not all of the items on the list of environmental outcomes will be appropriately addressed through incentives: some are better addressed through regulation. However, most will require a combination of approaches. We would urge against a crude hierarchy of environmental outcomes that are either 'in' or 'out' of an ELM system, and which do not take account of broader impacts upon landscapes as a whole.

We would caution against a reliance on the word 'beauty', which can have a specific meaning in other policies (e.g. planning, designation) and be limiting in its application. The more appropriate term is 'character'. The UK's designated landscapes (e.g. AONBs) are protected partly on the basis of 'natural beauty', for instance, but the goal must be to seek improvements across *all* landscapes, most of which will not meet the criteria for natural beauty.

6. Enhancing our environment

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

Outcome based payments ought to be the ultimate aim of any new ELM. However, the existing methodologies and tools for measuring these outcomes are still nascent, and are not yet at the stage where they could lead the development of a programme. It is not yet possible to measure all the listed outcomes to the same level of confidence – and this should not inhibit payments towards those outcomes.

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

Using landscape as the framework for investment ought to ensure that public interest and local ownership are strengthened. For instance: investment into planting new hedgerows, , ought not to be made where there is a significant negative impact upon the landscape character, for instance where it blocks valued sightlines into the countryside from the public realm: footpaths, settlements, etc.

9. Changing regulatory culture

How can we improve inspections for environmental, animal health and welfare standards?

We support the options listed. Particularly, we believe that greater use of earned recognition (e.g. standards, kitemark schemes, etc.) provide a real area of opportunity and potential cost savings. There are landowners whose practices are consistently well above the regulatory baseline, and there ought to be commensurate rewards for this: one of which may be a lighter-touch enforcement system. There are other potential benefits of this, including increased consumer awareness and marketing opportunities.

11. Protecting crop, tree, plant and bee health

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

We believe government should play an active role in all the options listed.

14. International Trade

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

The changes to domestic policy on international trade in agriculture, and any future agreements, represent perhaps the biggest risk to the ambitions laid out in this document. Government must be fully committed to ensuring high standards of food, social and environmental standards in any future trade agreements.

Who we are

The Landscape Institute (LI) is the royal chartered body for the landscape profession. As a professional organisation and educational charity, we work to protect, conserve and enhance the built and natural environment for the public benefit. The LI represents 5000 landscape managers, planners, architects, designers, and scientists, working across urban and rural areas.