

Agriculture (Wales) White Paper Consultation Response Form

Data Protection
<p>The Welsh Government will be data controller for any personal data you provide as part of your response to the consultation. Welsh Ministers have statutory powers they will rely on to process this personal data which will enable them to make informed decisions about how they exercise their public functions. Any response you send us will be seen in full by Welsh Government staff dealing with the issues which this consultation is about or planning future consultations. Where the Welsh Government undertakes further analysis of consultation responses then this work may be commissioned to be carried out by an accredited third party (e.g. a research organisation or a consultancy company). Any such work will only be undertaken under contract. Welsh Government's standard terms and conditions for such contracts set out strict requirements for the processing and safekeeping of personal data.</p> <p>In order to show that the consultation was carried out properly, the Welsh Government intends to publish a summary of the responses to this document. We may also publish responses in full. Normally, the name and address (or part of the address) of the person or organisation who sent the response are published with the response. If you do not want your name or address published, please tell us this in writing when you send your response. We will then redact them before publishing.</p> <p>You should also be aware of our responsibilities under Freedom of Information legislation.</p> <p>If your details are published as part of the consultation response then these published reports will be retained indefinitely. Any of your data held otherwise by Welsh Government will be kept for no more than three years.</p>

Confidentiality
<p>Responses to consultations may be made public on the internet or in a report. If you do not want your name and address to be shown on any documents we produce please indicate here <input type="checkbox"/></p> <p>If you do not want your response to be shown in any document we produce please indicate here <input type="checkbox"/></p>

Name :	Landscape Institute
E-mail:	policy@landscapeinstitute.org
Are you responding as an individual or as an organisation?	Organisation – Chartered Membership Organisation

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.

Introductory comments and Foreword Response

The UK's departure from the Common Agricultural Policy represents a major opportunity to improve our landscapes and people's relationship with them. We agree that it also presents challenges to the Welsh rural community and farming.

There is much in the white paper and previous policy statements (Sustainable Farming and our Land) that is very positive. We support the essential principles underpinning this work, especially that public money should be spent on delivering public goods and the frameworks of Sustainable Land Management.

The initial focus of the system is to replace subsidy for farming as we leave the EU; however, we must not lose the wider ambition set out in the Environment (Wales) Act. The Sustainable Land Management system can be the main delivery framework for transforming all land through investment and sustainable resource management. Wales now has an opportunity with SLM to develop a world-leading scheme that is far more ambitious than previous agri-environment schemes, and to transform the way we manage land. Getting SLM right is vital to achieve conservation goals but also to restore the natural processes upon which the production of healthy food, timber, and other goods relies. The new Sustainable Land Management system should focus on delivering a resilient and functional natural environment, that works in harmony with sustainable food production.

We welcome the Minister's comments recognising the importance of landscape to Wales, providing tourism, promoting heritage and social capital. It is important, therefore, to ensure that policy evolves to secure the continuation of sustainable and resilient agriculture which can continue to provide the public goods to wider society and protect and enhances Wales' unique landscape.

We have only responded to areas within the scope of our organisation and its members.

Regulatory Reform

1. What are your views on:

(a) The proposed approach to the creation of the National Minimum Standards?

(b) The need for flexibility to amend the National Minimum Standards where necessary? Are there any further considerations which are needed?

Please provide comments to support your view e.g. potential benefits and impacts.

a) We agree with proposed approach within the white paper. Streamlining and consolidating the disparate legal and regulatory frameworks under one central banner is an important first step for the new system.

The new regulatory regime must be supported by appropriate enforcement and encouragement of best practice. Solely raising standards will not lead to improved outcomes for the environment.

b) We agree with the need for flexibility to account for future changes where necessary; however the standards must be founded on a principle of non-regression – i.e. that future environmental standards must not be lower than those that the UK .

2. What are your views on:

(a) How advice and guidance can effectively support farmers to understand the National Minimum Standards; and

(b) The further considerations needed for advice and guidance? For example, what form guidance should take, who should provide it, the scope of guidance and how farm advisory services may support farmers.

Please provide comments to support your view, e.g. potential benefits and impacts associated with the considerations.

Access to appropriate advice is critical, both beforehand and in ongoing monitoring and management of SLM. Competent, professional advice and project management is vital in transitioning to the new system - and to meet other best practice standards and environmental targets. Advice must be accessible to all, appropriately funded, accredited, and supported by government (e.g. with clear guidance). The professional bodies should be involved where possible.

The importance of access to environmental and landscape advice, from competent professionals, cannot be overstated. Given that intensive advice to every scheme will not be possible, there is a need to improve the quality of advice that is given to land managers. Government should consider how accreditation and training requirements for advisors can be provided to raise the standard and consistency of advice. This could include the identification of appropriate third-party standards and the accreditation of private sector advisers by professional bodies. Professional bodies are already set up to accredit professional competence, deliver Continuing Professional Development (CPD), provide a home for best practice guidance, etc. SLM could make better use of this.

SLM – Future support

3. What are your views on the proposed purposes for funding in support of the delivery of SLM? Are there other purposes which you feel should be considered?

Please provide comments to support your view e.g. potential benefits and impacts.

We agree with proposed purposes underpinning the delivery of SLM. The fundamental idea of providing public money for public goods is vital.

We believe that one purpose of the SLM must be to protect and enhance landscapes. This could be delivered in a number of ways:

- Direct investment within designated landscapes. With designated landscapes already playing a major role in providing public goods, any increased investment to support existing Management Plans would directly support the Government's ambition.
- Provide funding for partnership working at a landscape scale. Working effectively at this scale is vital for addressing climate change, restoring and connecting ecosystems, protecting landscape character (e.g. for tourism), or conserving cultural heritage
- Funding to provide dedicated training. Ultimately, the greatest determinant of success in delivering environmental outcomes is the skill, knowledge, and approach of the person(s) delivering it. Government should work with the existing professional bodies to ensure that the various professionals involved in delivery are highly-skilled and capable, and have access to the tools and training to do their job well. Professional bodies are already set up to accredit professional competence, deliver Continuing Professional Development (CPD), provide a home for best practice guidance.
- Trees and woodland in and around our towns and cities represent a key part of England's network of green spaces. With 65% of Wales' population living in urban areas SLM could stretch to these areas. In England the Forestry Commission is carrying out an urban-focused Environmental Land Management System (ELMS) Test and Trial to help assess how the new ELMS grant system will work for these areas specifically.
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Forestry and woodland

4. What are your views on the proposed amendments to forestry legislation?

Please provide comments to support your view e.g. potential benefits and impacts.

We support the intention to provide funding through SLM to plant and manage woodlands. Trees and woodlands provide obvious benefits in terms of timber, landscape, biodiversity, access, health and wellbeing and carbon management.

It's important that land managers and those who would not typically join planting schemes are included in support. A good example is tenant farmers who are typically barred from tree planting on rented holdings. Rural landscapes and communities are not made up of only one type of stakeholder- there is a range from smallholders, to large estates. Enabling these stakeholders to participate in tree planting schemes will better support a landscape scale approach to tree planting. Such an approach can truly unlock the value that woodlands can provide for people place and nature.

Payments must be linked to more than just woodland numbers- targets for native woodland planting, hedgerow numbers and natural restoration could be prioritized by preferential funding.

Expanding urban and peri-urban forestry should be a priority as these spaces could greatly benefit from and contribute to increased tree, hedgerow and woodland cover.

5. What are your views on how the Welsh Government can support landowners in Wales to benefit from carbon markets for planting trees?

The current [Woodland Carbon Guarantee](#) scheme in England is a good example of how to develop a domestic market for woodland carbon sequestration. The Woodland Carbon Guarantee provides long term certainty for participants. It provides landowners with a guaranteed price for the carbon credits, set at the level required to make the investment worthwhile.

The guaranteed price, coupled with the index-linking can significantly reduce the financial risk associated with the long-term investment.

Encouraging participation in a market at a large landscape scale market would be preferable – for example encouraging all landowners in an AONB to enter a market – would allow superior spatial planning, ensuring that the right trees can be planted in the right places. Isolated planting schemes are less effective in several ways for example in providing wildlife corridors and, maintaining landscape character.

Any other comments

6. We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:



A large, empty white rectangular area with a thin black border, intended for providing additional comments or answers to the questions listed above.