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Brexit and our Land: Securing the future of Welsh farming  
Consultation response from Friends of Pembrokeshire Coast National Park  
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## Overview

The Friends of Pembrokeshire Coast National Park (FPCNP) is an independent voluntary charity which helps to protect, conserve and enhance the Pembrokeshire Coast National Park for all who live, work or visit here, to enjoy now and in the future.

We are pleased to contribute to this consultation with the aim of providing the very best outcome to bolster and improve the long term health and success of our National Park.

Brexit has provided this once in a generation opportunity to design a new Land Management Programme for Wales which is capable of addressing the rapidly changing pressures on our landscape, natural resources, economic resilience and social health.

National Parks have very clear purposes and duties which have been scrutinised and evaluated in recent years through the Designated Landscape review. This process has now been concluded and a direct set of priorities have been clearly defined and articulated via the Valued and Resilient statement in July 2018. The long standing purposes, updated through the recent review process and underpinned by the Environment Act (2016) and the Well-being of Future Generations Act (2015) provide a very clear foundation from which to create a progressive land management system in which National Parks can play a pivotal role.

In addition a robust, well-resourced regulatory structure is key to securing public support and confidence in a rapidly changing sector. Public attitudes are changing with an increasing interest in the state of our natural resources and a desire to see regulations updated and environmental targets met.

## 1. Chapter 4

### Land Management Programme

**We propose a new Land Management Programme consisting of an Economic Resilience scheme and a Public Goods scheme. Do you agree these schemes are the best way to deliver against the principles? If not, what alternatives would be best?**

The two schemes provide a logical starting point for providing alternative funding streams suitable for addressing the complex pressures on land use which exist in our rural areas and particularly in our designated landscapes. Farming has been the driving force behind the creation and maintenance of these iconic, nationally and internationally recognised landscapes and should ideally remain the primary vehicle for delivering the future outcomes that are of huge importance to Wales and to our three National Parks.

## **2. Chapter 4**

### **Land Management Programme**

**Does Welsh Government need to take action to ensure tenants can access new schemes? If so, what action would be best?**

Tenant farmers clearly need to have access to new schemes. Perhaps with specifically designed options given the limited potential within restricted timescales to deliver lasting benefits. Land use could change considerably with a growth in land available for rent if existing owner farmers choose not to continue without the support of the Single Farm Payment. Without access to credible elements of the Public Goods scheme tenanted land would be likely to be rapidly intensified to achieve commercial returns. This kind of unanticipated environmental consequence should be anticipated.

## **3. Chapter 5**

### **Economic Resilience**

**From your experience of current programmes, what do you feel would work well for the future?**

There is no widespread version of an Economic Resilience scheme currently in operation so it would be hard to comment meaningfully. The range of potential areas for support outlined in the consultation is extremely wide, from diversification into tourism to large scale renewable energy.

The infrastructure and expertise required to assess, roll out and monitor such a diverse range of commercial ventures does not currently exist at scale. Analysis of existing schemes and their ability to deliver successful results would be fundamental to deciding how deeply the Welsh Government feels it can become involved in such a broad range of commercial activity.

We would like to see investment by Welsh Government aimed at securing the long term health and resilience of ecosystems, reducing pollution and investing in intelligent productivity and skills rather than funding conventional, productivity-driven intensification.

## **4. Chapter 5**

### **Economic Resilience**

**Do you agree with the focus of the Economic Resilience Scheme being on growing the market opportunities for products from the land throughout the supply chain, rather than restricting support to land management businesses only?**

Yes. This recognises the importance of a wider rural economy and the role food production must play in the future economy as opposed to purely commodity production. Emphasis should be placed on the structures and mechanisms through which an ER scheme integrates and aligns with a wider rural economy.

## **5. Chapter 5**

### **Economic Resilience**

**Are the five proposed areas of support the right ones to improve economic resilience? Are there any areas which should be included but currently are not?**

Producing and selling high quality food will remain central to ensuring a stable, balanced rural economy.

However each of the five areas proposed must support the vision of Welsh land as a multi-functional asset that provides food and public goods simultaneously within the framework of the WBFGA and the Environment Act. We support the intention to support a transition which backs viable business plans which will in turn improve the use of natural resources, reduce a business' carbon footprint and move to a more circular economy. A dash for short term cash to fill the gap left by the withdrawal of existing payments should be avoided.

## **6. Chapter 5**

### **Economic Resilience**

**Of the five proposed areas for support, which are the priorities, both in terms of funding, and the sequence of delivery? For example, are certain measures needed in advance of others?**

Support should be based on what is required in a particular place. National Parks have a set of purposes and duties which have been scrutinised and clarified in great detail. The recent set of WG priorities (Valued and Resilient, July 2018) could be delivered via the ER schemes given appropriate resources and will. The priorities include halting the loss of biodiversity, decarbonisation, realising the economic potential of landscape, exemplars of sustainable management of natural resources, thriving Welsh language and others. Operating a farm or business within a National Park should be a benefit rather than a cost and driving up quality and standards through the ER scheme could be a successful way to deliver against the priorities.

## **7. Chapter 5**

## **Economic Resilience**

**Should we be investing in people, for example to bring in new ideas, skills and people into land management and the supply chain in Wales? If so, how should we look to do this?**

Investing in people is obviously the key to much of this. High quality advice and improving skills throughout the sector must be a priority. National Park Authorities in particular have expertise in many of the proposed areas of reform and have experience of recruiting and training skilled land managers from scientists through to apprentices. Long term professional relationships and locally based advisers are regularly recognised as the most effective way of getting things done.

National Parks have been tasked with collaborating and acting as exemplars and this seems an obvious opportunity to draw on their experience and skills.

## **8. Chapter 6**

### **Public Goods**

**We have set out our proposed parameters for the public goods scheme. Are they appropriate? Would you change anything? If so, what?**

Given the evidence of previous schemes we would support the approach of an outcome-based scheme that is capable of rewarding actual results rather than compensating for input costs.

National Parks already provide many of the proposed PG benefits and have long term experience and evidence which should be used to pilot and develop some of the proposals. Working with National Parks to test new schemes and build on existing projects is in keeping with NP priorities.

We believe that the maintenance and enhancement of landscape character and quality should be included as a public good – particularly within designated landscapes. Valued and Resilient (July 2018) points out that ‘These are landscapes of national importance with designation conferring the highest status for the conservation of landscape. Millions of visitors enjoy these special qualities every year.’

The effective delivery of the PG scheme will require a thorough review and comprehensive upgrade of the regulatory framework that will underpin the changes.

## **9. Chapter 6**

### **Public Goods**

**This scheme is meant to offer land managers the opportunity to access a significant new income stream as the BPS comes to an end. How could we improve what is being proposed to attract land managers whilst still achieving our vision and objectives?**

Due to the scale of change, a clear, gradual and easily understood transition from BPS to PG scheme will be vital. A sense of continuity where successful environmental schemes already exist and a flexible and customised approach which focuses on local conditions. Knowledgeable, on the ground advisers with experience of local conditions. An early clear indication of payment rates should be prioritised. Retaining the best of the existing schemes, particularly those which involve groups of individuals working together should be encouraged.

## **10. Chapter 6**

### **Public Goods**

**Are there any other public goods which you think should be supported? If so, why?**

As stated in Q8 the maintenance and enhancement of character, beauty and distinctive qualities of our landscape should be a public good included in the PG scheme. These characteristics are central to success of our National Parks and contribute to local and regional economies.

Registered common land requires a common-specific scheme that enables them to operate within a very specific set of parameters.

## **12. Public Goods**

**A collaborative approach to delivering public goods may in some instances provide better value for money than isolated activity. How could the scheme facilitate this approach? How could public and private bodies contribute to such partnerships?**

National Parks have wide experience of working with land managers and running land management schemes. Pembrokeshire Grazing Network and Conserving the Park both have years of experience and data which could inform new schemes.

Some public goods, such as flooding or nitrate pollution control, can only be dealt with on a catchment basis with all unit managers contributing. Any scheme should recognise this and provide specific support to coordinate activity. This investment would be the only way to unlock the potential of resources and reap the benefits of scale. Designated Landscapes are well placed to coordinate such large scale schemes. Whilst these may be complex to run, requiring expert staff in the field, it would lead to the realisation of the full potential of individual units and of the public benefits they can provide. National Parks and AONBs are being implicitly asked to achieve this in the recent priorities statement.

### **13. Chapter 6**

#### **Public Goods**

**Some actions can deliver multiple public goods in the same location. For example, peat bog restoration can have benefits for carbon sequestration and flood risk reduction.**

**However, some locations could be suitable for multiple public goods from different activities. For example, one location may be suitable to either plant trees for carbon sequestration, or to revert to wetland for biodiversity. How could locations for single, multiple or competing benefits be prioritised?**

National Park Management Plans are designed to identify, manage and deliver multiple benefits and they provide an existing template on which to build. These plans set the vision for the Park where single, multiple and competing benefits can be identified and addressed in partnership with others.

### **14. Chapter 6**

#### **Public Goods**

**Given that support for the delivery of public goods will be a new approach in Wales, there will be a requirement for a significant amount of training and advice for the sector. How best could this training and advice be delivered? Which areas of the sector need the most attention?**

A focus on retaining existing, trusted advisers would be crucial through any transition and beyond. Effective communication of these new schemes throughout the sector would be best delivered on the ground. Peer to peer networks and investment in locally based field officers would prove efficient in terms of take up and design of schemes. Anecdotally, previous reductions in accessible advice from locally based officers has hindered the take up and attitude to schemes such as Tir Gofal and Glastir. The vision needs to be 'sold' to the community rather than imposed.

### **16. Chapter 8**

#### **Transition, delivery and legislation**

**What are your comments on the phased transition period and our ambition to complete the changes by 2025?**

The Basic Payment Scheme has been the major part of the majority of farm business incomes for many years. Managing the transition period carefully and achieving a balance between the two schemes will be important. An immediate imbalance between take-up of the two schemes could throw the programme off course. Phasing and piloting schemes will help inform this risk. National Parks would provide ideal areas for testing ideas given the existing structures and skills available.

### **17. Chapter 8**

#### **Transition, delivery and legislation**

**What is the most appropriate way to phase out the Basic Payment Scheme to start implementation of the new schemes?**

Again, real life testing and piloting could start as early as possible and be rolled out pragmatically. Splicing together the existing agri-environmental schemes with new systems should be a top priority in order to avoid losing existing environmental benefits

### **19. Welsh Language standards**

**Will the proposed land management programme have any effects (either positive or adverse) on:**

- **opportunities for persons to use the Welsh language;**
- **treating the Welsh language no less favourably than the English language?**

Welsh language and culture remain strong in the agricultural sector, so the schemes should be aimed at protecting the social, linguistic and cultural benefits in line with the WBFGA. Providing high quality jobs in the advisory and administrative roles will help maintain strong links between the language and the land management sector.

Prepared by Gus Stott, Chair of Policy, Friends of Pembrokeshire Coast National Park. October 2018

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conserve and enhance the Pembrokeshire Coast National Park for all to enjoy  
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