



## SUBMISSION TO ENVIRONMENTAL AUDIT SELECT COMMITTEE

### Written evidence submitted by Cotswolds Conservation Board

#### Executive Summary:

- High farmer participation in agri-environment measures is essential to conserve and manage the Cotswolds Area of Outstanding Natural Beauty (AONB) to the standards national designation demand;
- The current first pillar cross compliance and 'greening' measures are blunt instruments that should cease once Brexit permits.
- Instead, more effective and suitably targeted new agri-environment schemes should be introduced to conserve and enhance outstanding landscapes in targeted areas such as the Cotswolds.
- In particular, stand-alone capital works programmes such as within the current Countryside Stewardship scheme should be developed further to accommodate specific national priorities and also locally identified priorities such as those within protected landscape statutory management plans;
- As bodies legally responsible for *creating* statutory, landscape scale, management plans, the National Parks and AONB Conservation Boards should be trusted to *deliver* the agri-environment schemes that help implement those plans;
- If general agricultural support payments are reduced, some rewilding may result - with benefits to landscape conservation, ecological networks, and habitat blocking (ie biodiversity offsetting) - but the potential is probably not great in the Cotswolds AONB, where the quality of the landscape and biodiversity depends crucially on suitably incentivised land management.

#### Introduction

This submission is made by the Cotswold Conservation Board, which was established by Parliament in 2004 and has two statutory purposes:

- to conserve and enhance the natural beauty of the AONB; and
- to increase the understanding and enjoyment of the special qualities of the AONB.

This submission has been prepared by the Conserving and Managing sub-committee of the Executive Committee. This sub-committee focuses on land management and natural resources.

The summary responses below address the questions set out by the EAC within the framework of sections:

1. CAP funding/new policies
2. Current schemes
3. Devolution
4. Rewilding

Whilst the questions are focussing on CAP and biodiversity, the Board would like to make the point that CAP and agri-environment is also important for landscape conservation and management and for influencing land management practice for the benefit of a wide range of services such as water quality, flood management, soils, access, historic environment and climate change. It is vital that a future agricultural policy targets and supports these important themes. These themes in turn support the local economy. Tourism, for example, is by far the largest economic sector in the Cotswolds worth £1 billion compared to a farm gate income of £111 million.

## 1. CAP funding/new policies

### ***Do any of your initiatives to support biodiversity in the UK depend on CAP related payments?***

The implications of leaving the EU for UK biodiversity are considerable. Much of the current UK legislation protecting biodiversity is from EU directives, either directly such as the Habitats Directive or indirectly such as the Bathing Water Directive. It is essential this legislation is retained after the UK leaves the EU.

CAP agri-environment schemes have had an essential role in the conservation and enhancement of the natural beauty of the Cotswolds AONB for nearly 25 years. CAP has secured and enhanced elements of biodiversity, landscape and access and to some extent supported business development enabling business diversification and the development and uptake of more environmentally sound farming which in themselves has helped to conserve and enhance the AONB landscape and biodiversity. The CAP has, however, failed to halt the decline in biodiversity and elements of landscape character such as dry stone walls and unimproved grasslands.

There is, however, much more that a successor to CAP could achieve, particularly the in face of intensifying agriculture, lack of productive woodlands and the threat of disease and climate change.

The Cotswolds AONB has been a targeted area for successive agri-environment schemes including the Cotswold Hills ESA with its particular focus on limestone grassland and dry-stone walls. More recently farms have transitioned into the Environmental Stewardship schemes with high uptake of the Higher Level Scheme aided by the focus provided by the highly successful Cotswolds Farmland Bird Project which was developed in a partnership between the Cotswolds Conservation Board, Natural England, the RSPB and others. Within the new Countryside Stewardship scheme, key environment resources and enhancement potential are targeted within the AONB (predominantly mapped in the Cotswolds National Character Area), but at present a high proportion of high value nature land remains in the previous HLS scheme.

Within the AONB, funding from agri-environment has benefited, for example, a very high proportion of statutory protected (SSSI, SAC) and non-protected species rich limestone grassland. A very high proportion of all new and repaired farmland associated drystone walling has also been supported by capital funding within agri-environment schemes.

### ***If we could start again with a UK agri-environment policy what would this look like?***

- *Are there any risks?*
- *How would you solve these?*

### ***How should future support for UK agriculture be structured in order to ensure there are incentives for environmentally-friendly land management?***

There has been a recognised imperfect start to the new Countryside Stewardship in England, with particular concerns surrounding administrative issues and its perceived and increased complexity. However the direction and increased focusing on targeted support to the most appropriate features and geographic locations is an essential pre-requisite within a budgeted scheme and a logical progression if we are to accomplish increased and additional environmental improvements. This is especially relevant to maintaining and increasing farmland biodiversity which continues to show species and habitat declines. There are individual and isolated good examples of the benefits of agri-environment support, but there is a recognised need to promote smarter landscape scale

conservation with these resources. The creation of the Countryside Stewardship facilitation fund to promote conservation synergy within adjoining land holdings is an example of such an approach.

There is now the opportunity – and a general and building consensus – to start again with an agri-environment scheme outside the parameters of any EU obligatory framework. As indicated above there is a lot right with the amended direction of the new Countryside Stewardship with a greater emphasis given to landscape scale conservation. Concurrent with this approach is an acceptance that many farms do not and cannot provide high levels of conservation benefit and provide poor value for money in agri-environment participation. There will need to be a more honest and candid conversation with the landowning sectors in this regard.

Such a scenario inevitably creates a large proportion of UK farmland that is unable to access any conventional publicly funded agri-environment scheme. The Pillar 1 payments have been assured until 2020 and any accompanying cross compliance and greening measures that apply. There is little support from environment groups for its continuation and there is little evidence of any traction within government and political ranks. An assumption can be made that the Single Farm Payment will effectively cease and with it the leverage attached to cross compliance including the greening measures where applicable. As a continued rationalisation for paying Pillar 1 support payments to farmers and landowners they have been successful, but the environmental and other public gain derived from these measures is not significant. Cross-compliance and greening measures as we currently operate will not continue in the attempts to offer and encourage some degree of environmental standards in those areas not targeted for agri-environment funding. The approach indicated accepts that many/most farmers will not be able to access an area based agri-environment scheme, and that an effective two tier countryside would be more evident. At a basic level therefore, compliance with a range of environmental standards will rely more heavily upon existing and any developed regulatory mechanisms including legislation and measures linked with food and farm assurance schemes. Advisory and policing levels and flexibility will need to be increased.

Any new scheme should ensure adequate reward for managing land and environmental assets, providing public goods and services. The new scheme should also be less prescriptive and be focussed more on achieving outcomes. Looking back over the past 25 years, the best agri-environment agreements and their optimum delivery on the ground has been with support of advisers who have a good working relationship with the agreement holders. This important element has been lost in recent years as has the ability to police the delivery of agreements on the ground.

Whilst there is the need to target schemes, future agri-environment schemes should not be too narrowly focussed and offer a full suite of options including the historic and cultural landscape

One of the main risks is undoing what has been achieved by successive agri-environment schemes over the past 25 years. For example, we have seen the loss of arable reversion after 20 years of public investment as the holding is not eligible to enter the new Countryside Stewardship scheme resulting in the loss of public goods such as biodiversity and water quality as well as wasting large sums of public money. When the grant ends, activity stops!

Consequently an element of continuity between schemes is important. Within the Cotswolds AONB agri-environment schemes have been well supported by the farming community. However, cynicism can easily creep in if there are frequent changes of direction by Government. Where the farming community are supportive of schemes, they are likely to put more of their own time and resources into it, providing additional public benefit.

Language and definition of terms in any new scheme taking a natural capital, ecosystem services and public benefit approach will be vital. Many farmers assume public benefit means access which is not the case. Also, many farmers and landowners are not clear what natural capital and

ecosystem services are and this will need some explanation. The same occurred with the introduction of 'biodiversity' which, several years on, is a widely understood term.

## **2. Current schemes**

### ***What are the positives/negatives of current schemes (e.g. Countryside Stewardship) that should be retained/avoided?***

As indicated in the previous section, there have been some good and recognised successes in maintaining and enhancing the environment with agri-environment schemes. There is considerable experience in the development and costing of conservation management options within existing agri-environment schemes, and these can be broadly relied upon and built on. Although initially attractive both politically and economically, payments based on more complex and developed forms of Payment for Ecosystem Services (PES) remain a continuing challenge. The 'green box' baseline of income forgone with the added flexibility of additional incentivisation will remain more appropriate and pragmatic.

However, it is likely that to increase biodiversity benefits for example, greater targeting of resources at ecological networks and at the landscape scale is required. The suggested bilateral approach to a more focused targeting of agri-environment funding might indicate the need and rationalisation to re-introduce a version of the Entry Level Stewardship, but evaluation of their impacts has shown limited additionality and overall poor value for money. However, field boundaries, pollinator conservation measures, and water quality measures are recognisably both widespread and of particular importance. With further development such measures could and might can be accommodated within a standalone capital works programme analogous to that now operating as part of the new Countryside Stewardship scheme.

Conservation schemes can provide and promote better environmental improvements with associated good advice. Where high quality and trusted advice is provided free at the point of delivery (such as Natural England project officers linked to HLS), good relationships between the provider and participant are evident and results and potential results can be more effective. Parallel with increased targeting of agri-environment schemes will be the targeting of associated advisory sectors. There will remain a need for a policing element but the differentiation that has been created between this and the advisory and implementation teams has not been helpful and will need to be addressed further.

### ***How should future UK agri-environment support be administered, and what outcomes should it focus on?***

On a broader level of administration of an equivalent agri-environment scheme – there is the opportunity to develop a more truly local dimension, which will also allow the opportunity to reduce administrative overlap. Working within a national (and devolved) framework, this would include established and credible organisations taking responsibility for agri-environment. These would include National Park Authorities and Conservation Boards, (for example, Snowdonia NP involvement in the piloted Tir Cymen scheme in Wales and a more recent partnership between Natural England and the Cotswolds Conservation Board to deliver a targeted HLS initiative).

With locally derived and regularly reviewed statutory Management Plans, AONBs and National Parks are ideally placed to prioritise and deliver schemes at a genuine landscape scale.

However the agri-environment is administered, it can retain its multi-functionality but its focus must be on attaining and increasing additionality. The strategic focus upon biodiversity and water

resources within Countryside Stewardship can and should be maintained. And the differential management above expected regulatory requirements adequately addressed within payment structures.

### 3. Devolution

#### ***What are the prospects and challenges for future environmental stewardship schemes in the devolved administrations?***

There is an understandable need to allow for variability within agri-environment between the devolved countries. And the continuation of such variability concurs with the appreciated need to develop local dimensions. However this also creates and maintains higher transaction costs that might otherwise be reduced. The previous and existing schemes across all four devolved countries share far more in common than they differentiate. Attempts to differentiate payment rates emphasise the consistent and greater differences that exist between agricultural and land use sectors, rather than between geographical regions. There is thus a significant opportunity to benefit from a more common framework. Any developed agri-environment framework can work within a local dimension as indicated and outlined in the above section.

#### ***How much divergence in policy between the nations of the United Kingdom is likely? How can divergence be managed?***

No response

### 4. Rewilding

#### ***What are the future risks and opportunities to innovative land practices, such as managed rewilding?***

- *Are there any risks?*
- *How would you solve these?*

#### ***What role can rewilding play in conservation and restoration of habitats and wildlife?***

The concepts of wildwoods and rewilding has been a potentially exciting opportunity and challenge for many years, with an added resurgence in more recent values surrounding landscape conservation, ecological networks, and habitat blocks (ie biodiversity offsetting). In particular with decoupling of agricultural payments and the assumed and probable reductions or abolition of these payments subsequent to the EU exit, these artificial barriers to very significant land use change are reduced. Such changes also merit development of alternative ways to support private land conservation and opportunities for synergy with other funded mechanisms. Such instruments include cooperative mechanisms, creative use of property law including covenants, and smarter involvement of volunteers.

The latest edition of England Natural Environment Indicators (Aug 2016) shows that bird and butterfly indicator species for woodland habitats in the UK are either stable or increasing, whereas those for farmland continue to be in serious decline. Re-wilding, by definition, seeks to recreate wild habitats such as native woodland and wetland. Where re-wilding is at the expense of important semi-natural habitats, such as species-rich limestone grassland, hay meadow, traditional orchard, or untreated arable field margins, there is a likelihood that farmland indicator species would suffer significant harm

Natural and semi-natural ecosystems are complex, and there is no simple prescription for avoiding harms through re-wilding. But in general, it makes sense to promote re-wilding on intensively farmed arable land which has low existing levels of biodiversity. A precautionary approach should be taken in areas which have either retained high levels of farmland biodiversity or else have the potential to extend and link neighbouring areas of high wildlife value.

Whatever systems can be developed, it requires a mindset change not only within the farming and land owning sectors who are generally fearful at being 'park keepers', but also within the conservation sectors. There are significant benefits to provide ecosystem services and to increase habitat types and associated biodiversity. Some habitat types and biodiversity within targeted areas may need to be re-prioritised, but the net gains to biodiversity alone can be very significant.

There will be challenges rather than risks that may need to be rediscovered or relearnt from international experiences including aspects of wildlife management, public access, education, insurance etc. By the nature of the aim to rewild, there can also be significant savings in resources given over to management.

As with other elements described in earlier sections, the crucial element in rewilding is the targeting of appropriate sites and in adherence to principles outlined in the Lawton Review<sup>i</sup>, ie to improve, enlarge and to join up. As an essentially managed landscape much of the Cotswolds might not be an appropriate location for re-wilding.

***Have you been incentivised to take part in rewilding schemes as part of new land management policies?***

No response

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<sup>i</sup> Making Space for Nature: A review of England's Wildlife Sites and Ecological Network. 2010. Report to Defra