

## ***Sustainable Farming and Our Land***

### **Consultation Response by the National Association for AONBs on behalf of Wales' Areas of Outstanding Natural Beauty (AONBs)**

#### **1. Introduction: AONBs and the future of sustainable farming in Wales**

The National Association of Areas of Outstanding Natural Beauty (NAAONB), is the collective voice of the AONB Partnerships and Conservation Boards and represents the AONB Network on issues of strategic national importance. Representing the five Welsh AONBs in particular, we welcome this opportunity to contribute to this important Consultation: *Sustainable Farming and Our Land*.

AONBs and National Parks have critical roles in the unfolding climate and biodiversity crises. The 'landscape' approach embedded within the management of these Protected Areas (PAs), is crucial to understanding the complex social, economic and ecological causes, consequences and solutions of these crises. The value of AONBs in this regard has been recognised by two recent reports: In Wales, the 2018 report *Valued and Resilient: The Welsh Government's Priorities for Areas of Outstanding Natural Beauty and National Parks*:

<https://gov.wales/written-statement-valued-and-resilient-welsh-governments-priorities-areas-outstanding-natural>

and, in England, the 2019 *Landscapes Review* [Glover Report]:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/833726/landscapes-review-final-report.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/833726/landscapes-review-final-report.pdf)

The potential for AONBs to positively contribute to ambitious targets in these areas was recently signalled at the NAAONB's 2019 Annual Meeting, where the Colchester Declaration was agreed:

[https://landscapesforlife.org.uk/application/files/7815/6326/2583/The\\_Colchester\\_Declaration.pdf](https://landscapesforlife.org.uk/application/files/7815/6326/2583/The_Colchester_Declaration.pdf)

AONBs, through their discreet spatial designations, their diverse partnerships and their broad management plans (encapsulating cultural, ecological, social and economic elements of landscape character) are very sensitive to changes and challenges in the rural environment. The plans and perspectives outlined within the *Sustainable Farming and Our Land* consultation document are therefore of interest to the AONB family in Wales.

Over the last generation scientific evidence and political consensus have recognised the central importance of farming practice within the rural elements of the climate and biodiversity crises. These interrelated crises have been negatively affected by the productivist elements of agricultural intensification that were encouraged through the Common Agricultural Policy (CAP) over the same period.

In addition to (but linked with) the impact on climate change and biodiversity, the rapid changes that have occurred within farming have also carried significant impact on landscape character, culture, Welsh language and community resilience.

Any attempts to encourage farmers to at least partially adopt practices that are concerned with intergenerational and ecological interests are to be welcomed. The philosophy, ambitions and aspirations

embedded within *Sustainable Farming and Our Land* are a step in the right direction. The scheme being developed is an improvement on previous attempts to provide environmentally sensitive farm support. However, the loss of area-based payments post-Brexit will challenge the farming sector and the livelihoods of farming families who have depended on simpler support and payment regimes. The need for empathy cannot be overstated, especially since many farming families under CAP often found themselves as the *objects* rather than the *subjects* of change within the farmed environment.

With careful attention to scheme design, empathy in roll-out, and consistency across the objectives for Sustainable Management of Natural Resources (SMNR) we are hopeful that an effective scheme of farm support will prevail, consistent with Wales' leading role in sustainability policy. To that end we offer the following commentary to the Consultation and would welcome an opportunity to work with Welsh Government and stakeholders on the design and delivery of this initiative.

## 2. *Views on the Sustainable Land Management (SLM) Framework*

**The SLM framework provides a clear logical model linking Benefits, Outcomes and Actions.** It is a useful expression of Sustainable Management of Natural Resources (SMNR) principles. For the framework to become most effective, there needs to be an integral process of monitoring and evaluation that allows for continual improvement. In that respect, over time, Actions will need to be adjusted to adapt to external factors and internal dynamism. The necessary flexibility is not yet presented within the framework. Benefits, Outcomes and Actions in the real world are not merely linear but reciprocal in their interrelationships.

The framework appears to assume a level of scientific certainty and consensus. This does not leave much space for those areas of SLM that would need to be covered by the 'precautionary principle'.

**The broad contributions of farmers, foresters and land managers have been covered at a generic level.** However, the major issue of soils (degradation, compaction and loss) would benefit from explicit mention under 'environmental' benefit. An ecological approach towards environmental issues (as implied in SLM) would justify placing soils on par with the listed areas of biodiversity, water and atmosphere.

Social benefits and outcomes have likewise been covered at the broad level. However, non-instrumental benefits should also be included (even if they are difficult to quantify). Some mention of 'intrinsic worth' would be welcome from a Protected Areas perspective at the very least (scenic beauty and other aesthetic and moral values reinforce wellbeing Outcomes particularly in the areas of mental and physical health).

**SLM Outcomes have been described well overall.** But (as noted above) the report has focused on instrumental and quantitative Outcomes. Non-utilitarian elements of value are conspicuously absent. An outline discussion of general qualitative Outcomes (a sense of scenic beauty, inspiration from nature and the ensuing emotional response) is necessary if artistic, aesthetic and moral values are to be brought to the surface.

It is right to focus an income stream on **environmental outcomes**, but there are some assumptions made in respect to normal market function that need further thought. For example, the statement that "some aspects of SLM are already rewarded by the market; in particular food" (3.26) glosses over the tendency for markets - particularly where international - to be dominated by monopoly and corporate interests, and for trade policies to be set by hegemonic actors within markets through scale-of-economy advantages, reduced costs of production or greater political power. In effect, markets can 'crowd out' necessary SLM elements of long-term sustainability in food production in favour of short-term profitability and its beneficiaries.

SLM implies market intervention through its emphasis on rewarding inter-generational and non-monetised Outputs. In that respect, inclusion of specific environmental food production techniques - such as agroecology, organic and permaculture that are currently placed at market disadvantage by their higher unit costs and lower levels of research and development - ought to be considered for inclusion under SLM-based farm support mechanisms. This adjustment to the categorisation of 'food production' in a public goods and SMNR discussion could result in significant adjustment to the **policy framework** that would enhance efficacy of this scheme and maintain Wales' international position as a leading agent of sustainable policy.

### 3. *Views on the proposed Sustainable Farming Scheme and Advisory Service:*

**The proposals for Farm Sustainability Reviews (FSR) and the Farm Sustainability Plans (FSPI) are very welcome and are improvements on previous forms of farm support.** However, the ambitious aspirations for this scheme require application of a very comprehensive, multi-disciplinary and strategic approach towards these initiatives and the subsequent deployment of farm support funds.

In particular, the role and professional accreditations of any FSR practitioner need careful thought for enhanced proportionality. If FSR practitioners are to cover all the relevant areas of SLM assessment (environmental, economic and sociocultural) then some form of training and formal accreditation would be desirable to push the function beyond the limited scope of 'land agent' or 'farm advisor'.

Through the direction of an Advisory Service, FSR practitioners would require a very wide skill set to cover all areas equally. Alternatively, FSR general advisors could be brought in for an Expression of Interest (EoI) stage, with a pool of specialist advisors and technicians being selected and brought in to enable fuller development of the FSR and FSPI.

From the perspective of landscape resilience (a subject of concern to National Parks and AONBs) some form of strategic and spatial planning for FSRs and FSPs would be desirable. Explicit reference to other areas of Welsh Government and NRW work (eg NRW Area Statements) should also shape FSRs and FSPIs. Individual farmers will have their local concerns, but no farm holding operates in isolation and their functionality across the spatial elements of SMNR need to be assessed. It would be worth tailoring specific FSR interventions within the AONB and National Park network so that farm support is consistent with relevant Management Plans and the broader aspirations of SMNR in these coherent and established landscapes. Wales' AONBs would welcome a discussion on how this could be achieved, and how Protected Areas can support and illustrate the benefits of this vital scheme.

In respect to the Sustainable Farming Payment (FSPy) proposals, multi-year payments to minimise volatility are welcome. As is the recognition that Welsh Government needs to underwrite payments where Outcomes have not been realised because of issues external to the farm or where Activities have not led to Outcomes.

The proposed EoI phase is important but needs some thought. Farmers' priorities may be more narrow than societal, landscape or SMNR needs. For the scheme to be effective, these broader elements need to be introduced from the outset.

**For the Sustainable Farming Scheme to succeed, there is a very clear need, as outlined, for an official Advisory Service.** For the sake of consistency, ease of and strengthening of regulation, and to maintain independence from the shorter-term winds of political change across Welsh Government, the **Advisory Service** could be housed within, or alongside, the independent statutory body Natural Resources Wales

(NRW). As such, NRW could oversee Advice directly, or via strategic partners whose specialisms lie in elements of SMNR.

#### 4. On the 'Evidence of Causality' and the depth of approach

When faced with the multiple and sometimes competing objectives embedded within sustainable development, it can be tempting to aim for simple solutions and 'quick-wins'. The emphasis placed on 'Evidence of Causality' in this report is very important in that respect.

The climate and environmental crises are complex, and the prescriptions embedded within the Sustainable Farming Scheme should acknowledge this. Apparently simple measures (such as mass tree planting) can compromise other elements of sustainability (such as the fragile biodiversity of Grade 4 and 5 agricultural land), and even contradict other approaches to carbon sequestration (such as conservation of peat uplands). Platitudes like 'right tree; right place' are industry standard, but care should be taken to ground truth the Farm Sustainability Plans to avoid conflict, and to provide a concrete basis for 'Evidence of Causality' to be established during monitoring and evaluation of this scheme.

Attempts to positively intervene in the farmed environment through targeted support is consistent with Wales' broader policy context (notably the Well Being of Future Generations Act (Wales) 2015 and associated Environment Act).

Without knowing the resource allocation that will support this scheme, a fine-grained and reflective process of development and roll-out would be welcomed. Quick, dirty and (relatively) cheap assessments of need are probably not viable – after a generation of encouraged 'diversification' and serious episodes of economic and disease crises there are probably not many "simple farm plans" in existence in Wales. As such, a process of prioritisation may be necessary as the many honourable aspirations of the Sustainable Farming Scheme come face to face with resource realities. In that environment the strategic and tactical targeting of resources will prove as important as the act of support itself. Designated landscapes, such as the AONBs, where coherent partnerships and spatial rationales already exist, could play a vital role in resource prioritisation across all elements of SMNR, and in support of the SLM framework outlined.

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***A WELSH LANGUAGE VERSION OF THIS CONSULTATION RESPONSE IS IN DEVELOPMENT***