

CONSULTATION QUESTION SECTION

ABOUT YOU SECTION



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A few more details on the Cambrian Mountains Society (CMS)

CMS was formed in 2005 with the following objects:

- *To promote, for the benefit of local communities, and of the wider public, measures which will sustain or enhance the landscape, natural beauty, biodiversity, archaeology, scientific interest, and cultural heritage of the Cambrian Mountains.*
- *To advance the education of the public in the landscape, natural beauty, biodiversity, archaeology, scientific nature, cultural heritage and geodiversity of the Cambrian Mountains.*

CMS is a registered charity (number 1113037) and at present has a membership of around 300. At the heart of the Society's work is that the glorious landscape of Cambrian Mountains might be better protected probably by joining the Welsh family of Protected Landscapes. This could be either as Wales' 4th National Park (NP) or 5/6th Area of Outstanding Natural Beauty (AONB).

CMS is aware that this consultation exercise is to aid in the design of a unique policy for a new Land Management Programme for the whole of Wales but in this response the Society will concentrate on how such a scheme might benefit the Cambrian Mountains. Here the Society defines the Cambrian Mountains as that area outlined in the 1972/73 Cambrian Mountains National Park Designation Order.

Initial Observations. CMS does not see this initiative by WG as a threat to Welsh farming but more as a different vehicle for farmers, and others in rural Wales, to receive support for how they produce food and in addition receive support for providing a mix public goods.

The predominant land use in the Cambrian Mountains (some 85%) is agriculture based and thus CMS views this consultation paper as vital as the Country probably moves away from the European Union and, as a consequence, CAP. In the Cambrians, traditional farming methods are a major building block of the landscape, as well as the mainstay of the rural economy. CMS considers it important that farming, especially nature friendly farming, continues to be financially supported but

the Society also believes that any new scheme to replace CAP must also take a more holistic view of these rolling hills at the heart of Wales. If WG is to address its own criticism of the Basic Payment Scheme (BPS) in that, –

“It is also not designed to realise the full value of Welsh land to the people of Wales.”*

then a new payment scheme should include not only the farming community but also other countryside managers. These might include; native woodland managers, wildlife trusts, historic landscape managers, and fisheries managers. In the future support might also be extended to individuals/groups whose focus is to restore natural processes to relatively large areas within uplands like the Cambrian Mountains. Doing things differently should help to maintain and enhance the unique landscape, biodiversity, amenity value and rich culture of the Cambrian Mountains.

Of course the arguments that CMS puts forward here might well be applied to other rural areas, especially upland areas of Wales.

[*Brexit and our land summary consultation document, page 2, para 2.](#)

GENERAL QUESTIONS

Please indicate whether you are responding as:

a. On behalf of an organisation

Please indicate which of these best represent you or your organization

a. Third sector

Question 1 of 20

From 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?

1. Yes, with caveats

If NO, what alternatives would be best?

1. Whilst CMS have no objection to the two schemes it considers that there should also be a third scheme namely, **Ecosystem Health Scheme**. One could argue that this is encompassed in the Public Goods Scheme but with a 56% decline in Welsh biodiversity over recent years it is important that this issue is addressed in its own right.

2. Land Managers in Protected Landscapes (NPs & AONBs) and also those that manage areas such as SSSIs, Local Nature Reserves and Local Wildlife Sites might attract enhanced payments from the proposed schemes.

3. Alongside the above land managers in areas such as the Cambrian Mountains and the Radnor Forest, prospective areas for Protected Landscape status, be looked upon favourably by the proposed schemes so as to ready them for designation.

4. The economic resilience, public goods (and ecosystem health) schemes must be of equal standing.

Question 2 of 20

From Chapter 4: Land Management Programme

Does the Welsh Government need to take action to ensure tenants can access new schemes?

1. Yes

If YES, what action would be best?

Tenant farmers and small holders can be as important to the health of their holding, if not more important, than their (potentially absentee) landlords. WG should maintain a database of both tenants plus landowners and negotiate with both over payments.

Question 3 of 20

From Chapter 5: Economic Resilience

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

In 1973 the Secretary of State for Wales refused to sign off the designation for the Cambrian Mountains National Park. WG, through NRW, now hold the devolved powers to reverse this decision. Bringing these hills, at the very heart of Wales into the Protected Landscape Family, alongside areas such as Snowdonia NP and Gower AONB, will greatly improve their economic resilience.

Whilst CMS is cognizant of the proposed Programme being divided into two schemes (and that the Society has now proposed a third scheme) the Society is of the view that without full integration of the Public Goods and Economic Resilience Schemes then the overall well-being of upland areas like the Cambrian Mountains are under threat.

Question 4 of 20

From 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. Grazing practices in the Cambrian Mountains, and probably other upland areas, have for many years done little for their mosaic of delicate habitats. In promoting a mix of high quality products, with a distinct provenance, stock numbers might be kept at a level whereby these habitats can be repaired, and at the same time produce a sustainable income for the farmer. For an example of this see; <http://www.cambrianmountains.co.uk/>

Decisions on type, and reduction of numbers, of stock to be reared will also have a

positive effect on a number of ecosystem services (public goods) provided by that land for example – less soil compaction leading to greater water holding capacity and reduced flood risk.

Question 5 of 20

From Chapter 5: Economic Resilience

Are the five proposed areas of support the right ones to improve economic resilience?

1. Yes with caveats

Are there any areas which should be included but currently are not?

Again CMS sees the close tie between economic resilience and public goods/ecosystem services as important. Attaining, and sustaining, good ecological health of a landholding leads to economic resilience.

CMS is wary over the Improving Productivity area of support. The drive for competitiveness must not be done at the expense of the landscape and its biota.

CMS would advise caution with one aspect of the Diversification area of support – renewable energy provision. Already swathes of the Welsh uplands are covered in wind farms and it is now acknowledged by many that these factories have a deleterious effect on; landscape, habitats and hydrology, as well as tourism (a component also promoted in this key area). Diversification into other forms of renewable energy provision such as solar parks and micro-hydro schemes should also be subject to careful consideration as they too can have damaging consequences similar to those with wind farms.

Question 6 of 20

From 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?

A combination of "Knowledge" and "Diversification".

Through this combination, 'new' methods of nature friendly farming can be introduced into the Welsh uplands. A recent example of this is the shepherding methods being trialed by the National Trust in Snowdonia. See:

<https://www.nationaltrust.org.uk/craflwyn-and-beddgelert/features/conservation-shepherding-at-hafod-y-llan>

Question 7 of 20

From 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?

1. Yes

If YES, how should we look to do this?

Greater investment in agricultural colleges, university agriculture faculties and agricultural apprenticeships.

Also consider such schemes as the National Trust's Farming Scholarships <https://www.nationaltrust.org.uk/craflwyn-and-beddgelert/features/llyndy-isaf-farm> as a model for bringing young people, with fresh ideas, into hill farming.

Question 8 of 20

From Chapter 6: Public Goods

We have set out our proposed parameters for the public goods scheme. Are they appropriate?

1. Yes, with caveats

Would you change anything?

1. Yes

If YES, what?

All of the parameters are appropriate but in addition include Landscapes within Public Goods , Parameter 1). CMS suggests that advice on this is taken from; NRW's GIS system 'LANDMAP' and also the same organization's 'Area Statements.' (This links in with parameter 3 Opportunities for action.)

Why should Landscapes be included within public goods? The Society suggests that in addition to their Area Statements that NRW's Landscape Character Map for Wales is reviewed, the introduction to which states,

– "Shaped by nature and people over time, landscapes form the environmental settings in which we live, work and enjoy life. They contribute to our quality of life, prosperity and well-being. By recognising landscape character, and the natural resources and cultural heritage that defines them, we can better understand how to shape our future."

For example, the above map delineates the Cambrian Mountains as a character area –an area not too dissimilar to the NP designation of the 1970s.

The above takes us back to the Society's response to Q1. – that land managers in Protected Landscapes, SSSIs etc. as well as prospective PL areas might attract enhanced payments.

In addition to the Resilient Habitats and Ecosystems (public goods, Parameter 1) CMS would add Biodiversity, especially if Ecosystem Health is not taken on as a Scheme in its own right as CMS suggests in Q1.

As stated earlier Wales is suffering from a 56% decline in biodiversity with many species at risk of extinction. Projects such as the Welsh Pine-marten project <https://www.pine-marten-recovery-project.org.uk/> and the Precious Pearls project <http://www.montwt.co.uk/what-we-do/projects/precious-pearls> need support. Landowners/tenants, large and small, could be incentivised to participate in these and other species recovery projects.

Moving on to Parameter 5, Additionality- a focus on active land management. Returning to the Society's Initial Observations toward the start of this response there may in the near future be landowners/tenants who wish to follow low intervention techniques to restore natural processes. Under parameter 5 they would attract no payment and yet they will be potentially delivering a range of public goods from their land.

Question 9 of 20

From 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

Try to arrange a series of open days hosted by landowners who use nature friendly farming methods. The Pontbren farmers may be interested in joining in with this? <https://www.preventionweb.net/publications/view/36141>

You could also include other organisations such as the Montgomeryshire Wildlife Trust who have already put in place a range of ecosystem services in their 'Pumlumon Project.'

<http://www.montwt.co.uk/what-we-do/living-landscapes/pumlumon-project>

Question 10 of 20

From Chapter 6: Public Goods

Are there any other Public Goods which you think should be supported?

1. Yes

If YES, why?

Looking to Scotland, Scottish Government has recently introduced, within their planning legislation, a series of wild land areas (WLAs). See link below, <https://www.nature.scot/professional-advice/landscape-change/landscape-policy-and-guidance/landscape-policy-wild-land>

These areas, distributed across Scotland, demarcate some of the best wild landscapes in the Nation. Whilst CMS is aware that Wales does not have the expanses of wild land that Scotland has, it does hold some of best wild land South of the Border. WG should consider a similar approach in Wales and collectives of

landowners whose lands are brought into a WLA should be supported through the Public Goods scheme.

Question 11 of 20

From Chapter 6: Public Goods

A number of public goods could potentially take several years, sometimes decades, to be fully realised. E.g. carbon sequestration through broad leaf trees. To deliver on these, land managers may need to enter into a long term contract. How do you see such agreements working? What do you see as the benefits or disadvantages to such agreements?

Public Goods such as Carbon Sequestration, 'Soft' Flood prevention and Soil Health have long term goals and landowners cannot be expected to put measures in place to achieve these goals without long term contracts. Monitoring of the measures put in place by landowners will be necessary if they are to retain contracts and Public Goods payments. Society as a whole has to acknowledge that care for the environment is a long term fix, it cannot be sorted in a day.

Question 12 of 20

From Chapter 6: 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?

CMS suggests that WG looks at such schemes as;

the Pontbren Project, the Carneddau Project, the Pumlumon Project, the Elan Links Project, and the recently launched Summit to Sea Project

All of these involve collaborative approaches to delivering public goods in upland settings.

Question 13 of 20

From 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?

A dedicated team in NRW should be able to develop a rational for these scenarios, which will no doubt be common. In the case of multiple Public Goods being provided by the same site a multi-factorial scale for payment could be developed.

Question 14 of 20

From 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?

Again NRW should have within it the skill set for both training and advice. If not then NRW should be given the resources to recruit further experts in ecosystem services.

Question 15 of 20

From Chapter 6: Public Goods

Private investment in the purchase of public goods is already happening, but at a relatively small scale. How could the new scheme promote greater involvement from the private sector? What are the barriers to this type of investment?

CMS is not sure if private investment is a reliable source of funding for Public Goods. To paraphrase – “**public** money for public goods” (CMS emphasis).

Question 16 of 20

From 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 farming community needs time to readjust to this new payment scheme which will no doubt involve it in different ways of working, including ‘paperwork’ but to have the changes completed by 2025 seems fair.

Question 17 of 20

From 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?

Very complex, but WG should beware of implementation such as that of ‘Universal Credit’ by Westminster.

Question 18 of 20

From Chapter 8: Transition, delivery and legislation

How can we simplify the current administration and delivery of the Basic Payment Scheme during the phased transition period?

No comment other than the response to Q17.

Question 19 of 20

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?

Much of Rural Wales uses Welsh as its first language, CMS sees no reason why this land management programme should effect this, providing those implementing the programme are sensitive to this, both in 'paperwork' and 'in the field.'

Question 20 of 20

Do you wish to make any further comments?

Not at the moment but CMS would like to join in with any further consultation on the consequences of BREXIT, with the aim of helping to secure the future of Wales' rich mosaic of landscapes.