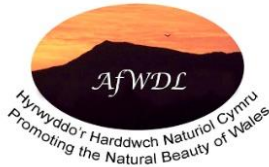


Alliance  
for  
Welsh Designated  
Landscapes



Cynghair  
dros  
Dirluniau Dynodedig  
Cymru



Economy, Trade and Rural Affairs Committee  
Senedd Cymru  
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11<sup>th</sup> November 2022

### **Agriculture (Wales) Bill Stage 1 Scrutiny**

#### **Joint response from Campaign for National Parks and the Alliance for Welsh Designated Landscapes**

*The Alliance for Welsh Designated Landscapes champions the stewardship of Wales' designated landscapes. AWDL brings together the expertise of local and national organisations working as advocates for the protection and management needed for Areas of Outstanding Natural Beauty and National Parks to deliver their purposes and flourish.*

*Campaign for National Parks is the independent national voice for the 13 National Parks in Wales and England. Our mission is to inspire everyone to enjoy and look after National Parks – the nation's green treasures. We have been campaigning for over 80 years to ensure that our National Parks are beautiful, inspirational places that are relevant, valued and protected for all. We bring together a wide variety of people and organisations to address issues affecting National Parks and take action to keep these beautiful places safe. We draw on a large pool of experts among our members, many of whom are actively involved in designated landscapes and their communities, across Wales and England and further afield.*

We are grateful for the opportunity to respond to this consultation.

We note the leadership which Welsh Government, guided by the scrutiny of the Senedd, has provided on issues including transport and climate change in recent years. We hope and believe that the same commitment to meaningful change is now being applied to work on biodiversity and landscape.

We recognise the priority which sustainable land management is receiving from Welsh Government, again with the underpinning of an informed Senedd. A landscape perspective is helpful in bringing thinking about people, nature, and natural resources together, while addressing these issues at a landscape scale is essential.

**We warmly welcome** the opportunity for urgently needed change that comes with the Agriculture (Wales) Bill.

Urgency comes from the recognition of the nature emergency and the climate emergency as twin existential threats.

Evidence is irrefutable that 70 years of policy and support systems for agriculture – including both production subsidies and more recently area-based payments – have proved environmentally unsustainable<sup>1,2</sup>. Previous production subsidies led directly to externalised costs on an immense scale – pollution, depletion of biodiversity, landscape damage. Current area-based payments are economically and socially inequitable; an inverse means-tested benefit, with greater means giving access to greater benefit.

Impacts of past policies and payments include; wholesale depletion of nature; degrading the functioning of ecosystems; diminishing the integrity and cultural inheritance of landscapes; damage to the standing of farming which needs to be redressed.

The big opportunity is to change course.

Agriculture and land management offer the greatest single sectoral opportunity for Wales to respond effectively to the nature and climate challenges outlined above. We need a new approach and new structures, to support farmers and land managers to reverse the impacts of past choices by politicians and policymakers.

There is an opportunity to democratise the relationship between people and land management, ensuring that the mechanisms that support farmers and land managers also benefit the Welsh people and environment. Wales needs more opportunities for ordinary people, including those not blessed with land themselves, to feel connected to their landscape, their *milltir sgwar*. Those opportunities include responsible access, where it is compatible with the needs of nature and of land managers. Bold actions, such as developing a National Nature Service, could bring people and farmers together, to help with land management, monitoring and planning. There is scope for a bold vision for farming, conservation and communities to work on a common prospectus, one which contributes to our collective prospering.

We can choose to support distinctive diverse local landscapes, where communities flourish, with a rich heritage of people, places, language, land-use and wildlife. It's time to choose.

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<sup>1</sup> <https://naturalresources.wales/evidence-and-data/research-and-reports/state-of-natural-resources-report-sonarr-for-wales-2020/sonarr2020-bridges-to-the-future/transforming-the-food-system/?lang=en>

<sup>2</sup> <https://nbn.org.uk/wp-content/uploads/2019/09/State-of-Nature-2019-UK-full-report.pdf> p.19

## Objectives for Sustainable Land Management

Designated Landscapes currently cover 25% of the land area of Wales, and this figure is likely to rise with the proposed designation of a new National Park for northeast Wales.

Designated Landscapes are rightly expected to be at the forefront of delivery on nature recovery and climate. For this potential to be fully realised, designated landscape bodies and partnerships will need to align their strategies and their work with Sustainable Land Management (SLM) objectives and seek to maximise their implementation through mechanisms such as the Sustainable Farming Scheme.

Sustainable Land Management should be designed and targeted to drive change in our Designated Landscapes, recognising the special qualities and special challenges in these places. This is critical to ensure Welsh Government meets its commitments to protect 30% land for nature by 2030. We encourage Welsh Government to use this opportunity to set out a clear vision for agriculture and land management within Designated Landscapes. This should include integrated support, rewarding farmers and land managers for work which:

- furthers the statutory purposes of these Designated Landscapes
- delivers nature recovery
- implements nature-based climate solutions
- conserves and enhances the landscape and historic environment
- manages better and greater public access

This alignment of Designated Landscape work should be enabled by ensuring that in relevant parts, including the objectives for SLM, the definitions in the Bill refer specifically to 'landscapes' and/or 'Designated Landscapes' as appropriate, in addition to 'land'. Highlighted in red below - example references to landscape in SLM definitions:

*'The fourth objective – To conserve and enhance the countryside, **its landscapes** and cultural resources and promote public access to and engagement with them, and to sustain the Welsh language and promote and facilitate its use.'*

We urge you to ensure that the Bill provides the vision and framework required in these areas:

1. The Agriculture (Wales) Bill, and the support and payment schemes derived from it, must deliver Sustainable Land Management (SLM). To do this **Sustainable Land Management must be properly defined, in terms clearly aligned with the definition of Sustainable Management of Natural Resources used in the Environment (Wales) Act**. To deliver SLM, the Bill needs to make provision for indicators and targets for:

- Provisioning ecosystem services – clean air, clean water, healthy soil
- Nature recovery - key species and habitats of local and national significance
- Protection and enhancement of distinct traditional landscape features and forms
- Sustainable management of carbon, nitrogen, phosphate, herbicides and pesticides.

2. The Agriculture Bill should actively support viable and sustainable rural communities. Provisions are needed for tenant farmers, enabling them to fully engage with delivery of SLM and other objectives. This is in recognition of the fact that tenant farmers have historically been disadvantaged in terms of access to support and payment schemes, with negative consequences for the environment and rural communities. Similarly the Bill should make new provision for progressive forms of land ownership, where they contribute to environmental and social objectives of rural areas, and specifically including objectives for the Welsh language. Lessons from work on common ownership in Scotland and elsewhere in Europe are likely to be useful here.
3. The Agriculture (Wales) Bill should enshrine the polluter pays principle. Welsh Government should not pay to meet regulatory standards, existing elements of cross-compliance or basic good practice. Instead, these should be pro-actively enforced, including through payment eligibility and penalties.

The Bill should use payments and support schemes to restrict the area of land which is owned 'at a distance' and used in ways which prevent it from contributing to the objectives of the Bill. This would, for example, restrict the wholesale purchase of land for unsustainable forms of carbon offsetting. The Bill should seek to disincentivise the use of land for purposes which are not consistent with:

- Sustainable Land Management
  - restoration of nature
  - support of viable and sustainable rural communities
  - Existing government objectives for the Welsh Language
4. The bill should enable responsible (permissive and contractual) access to increased areas of suitable land, where such access is consistent with the needs of nature and of land managers. We do not propose a general presumption in favour of access to all land in receipt of payments. Access should not be granted where it will result in significant disruption to land management operations. The sensitivity of habitats and wildlife to disturbance should also be an identified constraint, which will require proper assessment.

Enhancements to public access must be incorporated **as an option** into all strands of payments derived from the Agriculture (Wales) Bill. This should include funding for improving the accessibility of existing public rights of way, creating new access on land through payments for missing links in the network, routes at the urban/rural fringe, off-road paths to local amenities and otherwise inaccessible points of cultural and natural interest as well as access to water where that is consistent with nature objectives.

Farmers and land managers should be given the option to decide which enhancements best suit their circumstances, but actions must be informed by local needs, deliver clear benefits for the public. They must be supported with adequate guidance and advice.

The identification of suitable areas could be carried out by land managers working with field officers, with reference to local stakeholders and with an independent mechanism for review of areas included or excluded. The opportunity is to develop a mechanism for a more constructive dialogue and understanding between landowners and the wider public.

Accompanying new access, we suggest there should be a balancing requirement of responsible behaviour by the public. This could include enhancements of benefit to both farmers and wildlife, such as a requirement to keep dogs on leads at all times.