

Environmental Land Management – Consultation Response – Dartmoor Hill Farm Project

1. Do you want your responses to be confidential? If yes, please give your reason.

No

2. What is your name?

The Dartmoor Hill Farm Project (HFP)

3. What is your email address?

hfp@dartmoor.gov.uk

4. Where are you located? North East/North West/Yorkshire and The Humber/East Midlands/West Midlands/East of England/London/South East/South West/Remote

We are based on Dartmoor in the south west of England

5. Who are you? Internal to Defra/Defra arm's length body (ALB)/Lobby group/Other government department/Parliamentary group/Land manager/Other (please specify)

The HFP is a standalone body with its own terms of reference and a steering group made up predominately of farmers with representatives from the Duchy of Cornwall and Dartmoor National Park Authority. Its role is to support the broad range of Less Favoured holdings on Dartmoor from the valley fringes to the high moorland focussed primarily on livestock systems. This is a landscape populated by traditional family farms which underpin local communities and represent 30% of the employment in the National Park. The project fulfils its objectives through a combination of training, project work and advocacy. We currently have over 300 farms on our circulation list which are responsible for delivering the majority of land management on Dartmoor.

6. Do you have any comments on the design principles on page 14? Are they the right ones? Are there any missing?

Clearly the design principles are broad headings and we recognise the need to ensure the scheme meets national objectives linked to climate change, value for money and environmental gains. We welcome the desire to deliver a simpler more flexible scheme that builds on lessons learnt from the past and allows farmers and landowners to have ownership over outcomes.

We feel an additional principle should be added to ensure that ELM dovetails with other programmes of work and investment flowing out of both the Agriculture and Environment Bills. Programmes of investment such as the Countryside Productivity Grants and the Growth Programme all have a role to play in positioning a farm business to deliver ELM and maintain viability. Our hope is that careful thought is given as to how funds can be matched to design in opportunity both at the business and landscape scale. It would-be helpful to see better co-design between departments so that wider issues such as supply chains, technology and animal welfare are all considered in designing a delivery framework.

A key concern for Dartmoor farmers and landowners is the transition between the current support framework and the new world of public payment for public goods. This is both a financial and intellectual challenge at a time of climatic (weather patterns 2019/20) and societal challenge (covid19). Accordingly, either within the ELM programme or the Agricultural transition we would like to see both financial and advisory support to help with this step change. In our view this should reflect the challenges faced by the sector and in addition to transitional payments advice could be provided

at the local level. The PCF Farm Resilience Programme is a good example of a model that could be adapted and offered at scale.

We have the following observations under each of the stated principles:

A Uptake – the uplands are an area of predominately permanent grassland with extensive areas of semi natural vegetation much of which is under-pinned by reserves of peat. These areas already store significant amounts of carbon and are overlain by extensive livestock systems. Clearly there are opportunities to further our contribution to the national targets but we hope that the new scheme will acknowledge and reward existing best practice as well as driving forward carbon capture through specific programmes of work. It would be useful to understand how ELM will relate to other streams of funding such as the Nature for Climate Fund?

B Objectives – Dartmoor lies within a National Park and farmers within the boundary already face additional challenges in administering their businesses as a result of tighter planning controls and the core purposes of the national park authority. We would wish to see the farming community engaged in determining how local priorities might be shaped and determined. An example might be the adoption of local management plans which may have a lower level of participation from the forestry and farming sectors in comparison to other interested groups such as NGOs.

C Advice – The early iterations of Agri-Environment schemes were simpler and take up was good. Recent CS programmes are complex, bureaucratic and offer little ongoing support or guidance. We welcome a more effective scheme delivery but feel that ‘value for money’ for the taxpayer needs to be balanced with a reasonable level of incentive for the farmer. Designing a scheme to save money will not deliver outcomes or meet the aspirations of ELM to deliver targets such as those set out in the 25 Year Environment Plan

D Recognition – The uplands due to its unique physical and environmental constraints requires a bespoke offer in order to design in opportunities for farmers and landowners to participate. Current schemes such as Mid-Tier CS actively discourage engagement through poor design so we feel strongly that this principle needs careful thought. The past 30 years has seen a move to bring commons into Agri-Environment as a form of ‘collaborative’ working and this has introduced specific challenges around finance and allocation of funds. It will be important that ELM is able to encourage collaboration at a spatial scale both for commons and in-by systems and embrace different forms of land tenure and delivery (pls. see comments on ‘Tenure’ implications under Q.8 below)

E Reward – We welcome this principle but it needs to be embraced across the scheme, design including areas such as the contract design. Monitoring and evaluation and access to advice. Due to a lack of resources past schemes have involved little liaison or review between the two parties and we see this relationship as key to securing outcomes (see advice below). We would like to see existing environmental ‘values’ rewarded (see payments) to support those businesses that have invested in previous programmes of work.

F Priorities – The ESA scheme cost about 4% to administer and recent schemes are closer to 25%. We support this principle but wish to see a balance struck between efficiency and outcome. Our preference would be to see some resource retained for on farm liaison during the lifetime of the agreement and less money spent on systems and processes.

G Clarity – Technology is to be welcomed where it is supported by infra-structure and investment in skills training. On Dartmoor many farms are handicapped by a lack of a good broadband connection and also by the confidence to engage with the emerging digital world. Alongside ELM we would wish

to see programmes of co-related work to ensure upland farms are not disadvantaged in a paperless scheme.

H Enforcement – We would like to see a high take up of ELM which therefore requires confidence in the scheme from potential applicants. Clear objectives, responsibilities and apportionment of risk are important alongside advice and support. We feel these are the ingredients we think will unlock its potential if it's also backed up by a realistic payment structure.

7. Do you think the ELM scheme as currently proposed will deliver each of the objectives on page 8?

We feel there needs to be greater emphasis on 'maintaining' the positive achievements of the past 30 years of agri-environment where substantial investment has been made in key habitats and species. Whilst not everything has worked we have seen some significant enhancements of particular habitats and species in which framers and landowners have invested considerable time, energy and enthusiasm.

A positive opportunity within ELM is to recognise and endorse good practice and to incentivise landowners by rewarding performance. Too often in the past schemes have excluded those who have done the right thing in favour of those who have ranched or abused their holdings. An example is boundary restoration in the uplands where a large ring fenced farm may benefit from restoration grants to the disadvantage of multiple smaller family farms. The latter being excluded because of the quality of their maintained walls or hedges.

The current narrative talks of 'nature recovery areas' but we feel that on Dartmoor the emphasis should be on 'improvement'. ELM talks about attracting a very high percentage of active farms and in order to do so we would like to see the first objective amended to positively recognise 'maintenance' as well as securing environmental benefits. Perhaps the objectives should read 'Maintain and enhance positive environmental benefits, prioritising between environmental outcomes where necessary'. Since the ESA there has been a high take up of schemes on Dartmoor and it's important to recognise the legacy of programmes to date.

Although ELM talks of culture and heritage there is no reference to this within the two objectives. Dartmoor has a rich archaeological landscape and in previous schemes investment has secured enhancements alongside environmental gains for habitats and species. We feel this should be recognised alongside specific practices such as commoning and the maintenance of locally distinct livestock breeds. The insertion of the word 'cultural' after environment could address these points.

The second objective talks of prioritisation and we understand that focus and resource allocation are key to achieving progress within ELM. We would however like to see these apportioned across different sectors from arable to upland to ensure that they are SMART and deliverable. On Dartmoor we have a very high percentage of common land and these large landscapes are managed by a relatively small and diminishing number of active graziers. It would be helpful to have some national dialogue and input to what the focus should be for upland areas particularly when large investments are being made in peat and forestry. It would also be helpful if the objective addressed co-related issues such as access. In designated landscapes this can create additional pressures both on environmental quality and livestock based systems. We would like to see the objective amended to state 'To help tackle some of the environmental challenges associated with recreation, culture and agriculture focusing on how to address these in the shorter term'.

The design of the scheme is clearly in its infancy and we hope that the test and trials will inform this further. In order for ELM to achieve the objectives we have the following observations:

- Take Up – delivery will be closely linked to participation levels. It's therefore important that Tier 1 is widely accessible to all upland farmers and that the options are relevant, attractive and deliverable. Similarly, Tiers 2 and 3 need to embrace specific upland habitats and pastoral systems and in particular common land
- Flexible – participants should be able to engage at all three Tier levels if they have appropriate features and spatial relevance
- Collaboration and Reward – the scheme will only deliver against the objectives if it can do this at scale and incentivise collaboration. This will require a combination of advice, support and realistic financial reward
- Ownership – engagement of upland farms in determining 'outcomes and priorities' of the two objectives will help in ensuring ownership and participation in ELM
- Rural Economy – in order to deliver the scale of ambition it will require resource and skills and this will need to come in part from the rural economy. Alongside ELM it would be helpful to see other programmes of work such as skills training and capital investment aligned to support key areas

8. What is the best way to encourage participation in ELM? What are the key barriers to participation, and how do we tackle them?

Encouraging participation requires the scheme to be attractive on a number of levels from financial reward to administrative burden and apportionment of risk. It also needs to be well promoted, widely accessible and relevant to the range of upland and less favoured farms.

Our thoughts on an accessible scheme include:

Eligibility – we feel the scheme should be predominately focussed on farmers or land managers and that some form of eligibility criteria should be applied. This should not discriminate against smaller holdings but should try to separate those who receive significant public funding for environmental delivery from other sources i.e. charities, HLF etc. Clearly ELM should be a voluntary scheme.

Tenure – this is a potential barrier to participation and for tenants the current schemes require landlord consent and a period of security over which to deliver outcomes. This presents issues for those on modern FBT's which tend to be short term and offer little security. It also represents a barrier for new entrants operating on other forms of tenure such as grazing licences and seasonal lets. On Dartmoor 48% of the land is tenanted which is way above the national average at 35%. Landlords also reserve certain aspects of the farm which are therefore not available to the land manager as part of a scheme or indeed for blended finance. This may cover trees and woodland as well as public goods such as peat and water which might also form the backbone of collaborative landscape scale agreements.

New entrants face major challenges in establishing their businesses where they often have multiple landlords with little security of tenure operating on grass let's or very short term FBT's. This not only impacts on their ability to enter CS but also other grant streams such as the Growth Programme.

In order to overcome these barriers ELM will need to consider tenure and who is the 'active manager' carefully. Ultimately both the landowner and the tenant will have some interest in any financial remuneration but the balance and apportionment of funds and responsibility will clearly influence take up of the scheme. It would be helpful to see DEFRA considering some form of national discussion with landowners on what are key issues if uptake targets are to be achieved for ELM.

ELM Administration – this should be in the form of a simple contract between two parties which sets out clearly the objectives, outcomes and their roles and responsibilities. The agreement holder should be able to simply identify options applicable to an upland farm and have the confidence to deliver them, or know how to ask for help if required.

As the aspiration of ELM is more of an ‘outcome’ based approach there is clearly an issue of confidence and risk associated with delivery. This may be a significant barrier to participation if the level of penalties and assessment is such that the applicant feels exposed. There needs to be an acceptance that nature is complex and things may not be right first time. To reduce the risk of failure we support a system like the Irish Pearl Mussel Project <https://www.pearlmusselproject.ie/resources/video-resources/pmp-supporting-actions.html>. where advisors are able to support or nudge behaviour as part of the assessment framework. It’s also important that the burden of process is significantly reduced and that external risks to performance are properly assessed and covered in the contract. Examples on Dartmoor include permissions to extend or change stocking calendars and the impact of wild fires.

The contract should be fair and equitable for both parties and the RPA should be accountable for missing deadlines in the same way the agreement holder is. It should also cater for succession or the adoption of the contract by a spouse or partner without bringing the whole agreement into question.

Payments – this is critical to participation and needs to incentivise beyond the traditional payment calculations. Clearly WTO rules place some restrictions but the government will need to be creative to attract the projected levels of participation. In the uplands farm income levels are critical with most holdings unviable without BPS and the Agri-Environment payment yet they deliver huge environmental and landscape benefits. Calculations need to look at income forgone, additional costs, opportunity costs, and the full cost of management and transaction costs. In situations where farmers collaborate there should also be some form of bonus payment to reflect the degree of collaboration. If ELM is seen as rewarding ‘public goods’ then we also need to acknowledge that the uplands have existing natural capital values which should be rewarded. These can be grown and incentivised over time through ELM but should be accounted for in any contractual agreement. In the PBR model this allows a condition to be scored and valued rewarding those who have invested in their natural resource.

We would also like to see support that reflects the contribution of small family farms by the consideration of a weighting. Payments should reward existing standards and incentivise progression. Payments should be paid quarterly or ideally by BACS on a monthly basis to even out the market bias of annual payments.

Flexibility – the scheme should allow flexibility both to enable ‘tweaks’ to the original options and the ability to add or amend new actions. This should be available throughout the programme but specifically for those farmers collaborating or working across a landscape. Giving farmers the confidence to experiment will be central to delivery and this requires greater flexibility within the scheme. An example is upland hay meadows which have a very prescriptive cutting date and restrictions on management. As a result, everyone cuts at the same time and in the same way resulting in peaks of activity and a homogenisation of the landscape and flora.

It’s also feasible that to develop spatial applications people may join over time with different agreement start and end dates. The scheme needs to allow for this and to work with other funders programmes to facilitate access to blended finance.

Inter-Face – ELM should be able to work with other sources of funding and to be seen as part of a whole farm approach to the business allowing planning of other investments to fulfil potential.

9. For each tier we have given a broad indication of what types of activities could be paid for. Are we focusing on the right types of activity in each tier?

As set out above we feel that the scheme should allow applicants to move between tiers and therefore it's less about the structure and more about the options available particularly in Tiers 1 and 2. If DEFRA is to keep to its position of offering initial engagement through a menu of options then we would hope to see the needs of upland areas addressed within the broad scope of the offer. Whilst some sectors have embraced simplified Wildlife Offers there has been reluctance to enter into these in the uplands in part due to restrictions (over SSSI etc.) but also the limited capital works options which has acted as a disincentive. We would hope that payments for capital works will be made available across the three tiers or the payments rates significant enough to cover these investments over the lifetime of the agreement.

The examples given in the consultation for Tier 1 tend to focus on more intensive lowland systems and don't necessarily embrace the extensive pastoral system of the uplands. We would like to see a package for soils, grassland and livestock which is more specific and supports the farming systems and habitats on Dartmoor. This might offer incentives around traditional field boundaries (hedges and walls), small field systems, native breeds of livestock, natural flood management, moorland etc. The offer should be accessible and link to traditional and modern approaches tailored to the landscape. This might look at hay meadows and herbal leys as well as cover crops linked to low input establishment techniques. There is also a need to address neglected farm woodlands and place higher values on small scale tree planting and natural regeneration. Current schemes discriminate against group applications and impose high minimum thresholds for planting. The new scheme should seek to enable and not obstruct delivery. It would be helpful to look at animal health and welfare in Tier 1 again tailored to local issues which might link to delivering environmental outcomes. This could include issues such as tick borne disease, worm resistance and delivery mechanisms such as hefting.

We feel that Tier 2 and 3 would be applicable to Dartmoor at different spatial scales. The examples given could be expanded to illustrate upland habitats which are often a mix of open heath and moorland with more discrete areas of species rich grassland, woodland and valley systems. These could again be set within local priorities so areas such as rhos pasture, upland bog and mire systems can be targeted within catchments or at landscape scale. We would expect to see collaboration being rewarded not just at the habitat and co-design phase but also through delivery. This might cover a range of topics from scrub and swaling plans to education, access and animal welfare. Water, peat and carbon clearly feature strongly but to incentivise participation there needs to be clarity between landlord and tenants over access both to payments and natural capital markets. It may also require a joined up approach to local targeting so that participation is incentivised from the top to the bottom of the catchment. We welcome the inclusion of geodiversity and heritage asset management in the upper tiers particularly where this unlocks the potential for capital investment. Items such as the ¹HAP under the older HLS were invaluable in funding works which otherwise would not have been viable for upland farms to consider.

We feel that issues such as species re-introductions requires careful thought and that the scheme should focus primarily on 'recovery' unless there is a clear and well supported case at the local level. Experience elsewhere has demonstrated the cost and challenge where problems with reintroductions

¹ Heritage and Archaeological Feature Protection Grant

arise. If this Tier is designed for all land managers, then the degree of specialist input and scrutiny is likely to require additional resource.

Common land is central to the uplands and requires special attention. The test and trial on Dartmoor is looking at a number of issues that link the home farm and common. Whilst many commons have entered agri-environment schemes it can be challenging to gain consensus and to administrate agreements with various interests and levels of engagement from active to non-graziers. As a dynamic system determining outcomes can be challenging and we feel it requires a different approach to traditional HLS / CS schemes with ongoing advice, support and dialogue between parties. If ELM wishes to reach its targets for participation this needs addressing and may require legislative change alongside financial incentives.

We feel that broader areas such as urban green space and parks should remain outside of ELMs which should be funded through existing sources

10. Delivering environmental outcomes across multiple land holdings will in some cases be critical. For example, for establishing wildlife corridors or improving water quality in a catchment. What support do land managers need to work together within ELM, especially in tiers 2 and 3?

We feel collaboration is applicable across all three tiers.

A successful collaboration is usually farmer owned and led and requires a clear vision and clarity around roles and responsibilities. Inevitably this often includes the services of a trusted advisor (or facilitator – the two are not necessarily mutually exclusive) and potentially professional input from relevant agencies dependent on the scale and level of ambition. Ultimately to encourage collaboration ELM will need to finance this at a sufficient scale that rewards those who go beyond the farm boundary. Given the nature of rural communities not every neighbour will wish to engage in this process so the scheme needs to allow programmes of work to come forward that will evolve over time. This might allow farms to 'slot into the jigsaw' by using complimentary options but they may forgo the collaborative payment if they chose to remain independent. There is also a case to be made for collaboration of 'minds' that isn't spatially constrained but allows progression within a specific strand of ELM related target.

As stated above common land is a model of collaborative delivery that has the potential to unlock 30% of England given its extensive coverage of the uplands. However, the Common Agricultural Policy failed to address the existence of commons and subsequent regulation has compounded this. National legislation around commons is only now beginning to catch up after the 1965 CRA and only a few areas such as Dartmoor have their own private members bill to bring in specific legislation. Our recommendation is that ELM should seek to embrace an upland commons model with the engagement of landowners, Commoners Councils and Commoners Associations. This should take the lessons from the Dartmoor Test and Trial and those being run by the Foundation for Common Land and ensure that future schemes are designed to embrace the outcomes from ELM and the emerging natural capital markets.

The cost of commoning is often under represented and on Dartmoor processes are in place to try to evaluate more accurately these figures. Developing a clearer idea of the cost of delivery should inform the payment calculations for ELM and provide an incentive for graziers to continue to engage with the common. We feel ELM could also provide a dedicated payment and support for new entrants onto the common so we can enable transition and future proof delivery of ELM within the next generation.

11. While contributing to national environmental targets (such as climate change mitigation) is important, ELM should also help to deliver local environmental priorities, such as in relation to flooding or public access. How should local priorities be determined?

ELM will need to be a combination of strategic national priorities which are then interpreted within the local area.

Setting priorities at the local level should be a process that involves farmers and landowners working with other agencies and interested parties. On Dartmoor this would be specifically the National Park Authority as well as key players such as the Environment Agency. (EA) There is already a large number of strategies and documents that have been produced on Dartmoor and previously used for targeting schemes such as the National Character Areas. We are concerned that Local Nature Recovery Strategies may well constrain opportunity if they are narrowly drawn. We would prefer to see Dartmoor categorised as a Nature Recovery Area (NRA) in its entirety. This would then allow projects to come forward from collaborative groups that can be assessed and evaluated against local priorities. Agencies such as the EA and the FC already have well developed plans and knowledge of Dartmoor and are currently planning future programmes of work. The adoption of existing generic models for spatial prioritisation may not have the degree of scrutiny, ownership or input from the agricultural sector. The current Test and Trial on Dartmoor is discussing with farmers what role can National Park Authorities play in shaping, facilitating and delivering ELMs?

Farmers on Dartmoor are already exposed to high degrees of public access and there is a general feeling of fatigue as illustrated in our recent comments on the draft Dartmoor National Park Management Plan. There may well be further opportunities for permissive access but we would be concerned that local strategies should dovetail with ELM and NRA's when setting targets. There is a potential conflict between some of the outcomes farmers may be tasked with achieving and existing levels of public access. On Dartmoor waders and ground nesting birds are subject to recreational disturbance and this may well have had direct impacts on some key species such as Curlew as part of a complex picture. If a farmer or a collaborative group is tasked with achieving an outcome recreational impacts need to be factored into evaluation of any contract. It would be helpful to see some form of national approach to policies which work with ELM and NRA's to support outcomes.

We are positive about the role that farmers can play in educating the public on the production of public goods and how their food is produced. Past schemes have provided some incentives for educational access but these have been limited and constrained by budget. It would be helpful to see a more creative approach to this topic that might link to Tier 2 and 3. As an example a group of collaborating farmers could use a mobile classroom for delivery across a landscape or technology to link their farms with a network of local schools. ELM needs to work with other investment streams that provide capital funds (diversification) linked to educational outcomes.

In setting local priorities due consideration should also be given to the regional variations and limiting factors. As an example what could be deemed as species rich grassland on Dartmoor might not meet the current CS matrix but may be locally significant. Making sure targeting, qualification thresholds and payment levels reflect this will be key to designing a successful ELM scheme.

12. What is the best method for calculating payments rates for each tier, taking into account the need to balance delivering value for money, providing a fair payment to land managers, and maximising environmental benefit?

The calculation of payment rates is critical to the success of ELM and the future viability of upland farms. Unlike lowland equivalents the opportunity to venture into alternative markets or to diversify is limited within the tighter planning controls of the National Park. DEFRA's latest figures clearly show the vulnerability of the hill unit and with the removal of BPS it will be essential that ELM realistically rewards farmers for delivering public goods. In the 'new world' the uplands potentially have significant resources of public goods which require investment.

We need to see a calculation which goes far beyond income forgone and includes all costs (additional costs, opportunity costs, the full cost of management, advice and transaction costs). This should be based on the cost to the business of delivering the agreement year round where livestock are kept to achieve an outcome. An example would be where cattle are kept to graze specifically for an HLS agreement for a matter of 3-4 months but need to be kept and paid for year round. We would also like to see advisory services to support outcomes either covered within payments or provided free of charge from external agencies. The experience of other Agri-Environment models has reinforced the importance of ongoing advice and support in achieving outcomes. In situations where farmers collaborate there should be an attractive bonus payment to reflect the degree of collaboration.

We would like to see ELM explore options for Payment by Results using stepped models that reflect existing habitat quality and incentivise enhancement. This rewards the farmer for their efforts and provides guidance and encouragement within a clearly understood framework of assessment, scoring and advice. A number of farmers from Dartmoor have visited the Burren <http://burrenprogramme.com/impact/outputs/> to look at a PBR scheme and were impressed by the feedback from participants and the delivery model. There are however clearly risks associated with this approach which needs to be based on habitat quality and requires some local moderation to determine scoring levels. There are also issues over collaborative agreements and the sharing of risk. An alternative model for group agreements would be to pay against farm level performance and then to consider scores for a collective group bonus which could then be allocated against commitment and outcomes. We feel that most Dartmoor farms should have the opportunity to sit within Tier 2 and 3 of the scheme as outlined.

The Dartmoor Test and Trial is exploring what a payment by results system which works for both 'home farms' and the commons look like? Experience on Dartmoor has highlighted the challenges of payments on commons which can introduce an adversarial element to a communally shared space.

We do not feel that reverse auctions are a way forward for upland farmers to deliver environmental outcomes. These usually involve a race to the bottom and do not necessarily deliver value for money for the tax payer. DEFRA should be prepared to pay farmers a realistic rate for delivering outcomes and the prime motivation should be quality and not the cheapest bid. It would be helpful if the system reflects the important role of the family farm and considers weightings that may help maintain the viability of smaller units.

The HFP would like to see a working group established to assist DEFRA in these calculations and would be willing to participate along with other bodies such as the Foundation for Common Land.

13. To what extent might there be opportunities to blend public with private finance for each of the 3 tiers?

We have concerns over blended finance as the markets are not well developed and experience on Dartmoor has failed to build confidence in some of the best used examples i.e. water companies. The Dartmoor Test and Trial has been looking at the question of whether there is a role for private finance within ELMs at a local level.

With respect to water we feel it would be beneficial if the EA were able to offer revenue streams alongside its natural capital works as it moves towards environmental solutions for flood alleviation. This would provide the farming community with greater security and confidence that agreements would be honoured. It may also stimulate engagement and participation in ELM. A key barrier to blended finance is financial security as highlighted by the impacts on the market place caused by covid19.

Currently there are limited options available for blended finance and many of these only work at a collaborative scale. In the case of small upland farms emerging markets for woodland carbon are unrealistic given the scale of establishment and the species choice which may be restricted by the landscape designation. There are also issues over compatibility with other sources of funding and length of tenure which is further complicated by the landlord often retaining trees and woodland in hand. It will require some form of rationalisation between agencies to ensure agreements are accessible and that measures such as the Woodland Carbon Code work effectively within or alongside ELM.

There is however some potential for emerging markets for carbon based on peat and this is a habitat which has and is likely to see significant investment in the short to medium term. Much of this resource lies on common land and again this requires agreement between the owner of the carbon and the right holders in order to unlock any potential markets. It would be helpful if ELM might consider revenue payments for active graziers where the common is part of an ELM agreement and allow the landowner to test the open market? Ultimately we are concerned that this market place may be chaotic and difficult to regulate with varying payment methods and some of the outcomes falling to the next generation to deliver. In areas such as national parks development levels are low and unlikely to generate sufficient 'net gain' revenue streams to be of value. Given that most LPA's will want to see funds spent in their own areas options for investment will be further limited. There is also evidence on Dartmoor of farmers unwilling to 'off set' bad behaviour by taking funds from those who are yet to adjust their business practices whilst they can access this endorsed market place.

In summary we are concerned that until markets have developed this option is difficult to access and potentially unreliable for the average upland farm. We would hope to see this work stream piloted in order to build confidence in future markets.

14. As we talk to land managers and look back on what has worked from previous schemes, it is clear that access to an adviser is highly important to successful environmental schemes. Is advice always needed? When is advice most likely to be needed by a scheme participant?

We feel advice has a valuable role to play in ELM and most farmers already have an established network of support and advisors. Dependent on the need this might be an ecologist, a land agent or it could be a vet so the applicant needs the discretion to appoint the most suitable person to fulfil the role.

Experience has shown that recent iterations of Agri-Environment are so complicated that the applicant finds it challenging to understand their agreement and to interpret the outcome. In essence they are disengaged by the process of FEP's, FER's and lengthy prescriptions with reams of do's and don'ts! In theory Tier 1 agreements in ELM should be accessible to most farmers with a degree of experience from previous schemes and should require no or limited advice. It would be good to see simple clear guidance available to all and in the initial stages some form of training and mentoring for farmers and advisors. On Dartmoor we have talked about developing focus farms where interested parties can meet and discuss practical management on the ground. In the case of Tiers 2 and 3 these will be by their nature more complex and may involve multiple landowners. In these cases, advice is likely to be required and may be needed from more than one individual to design, model and deliver the scheme over a period of years. We feel these costs should either be covered in the ELM payment or be provided through a Government body or third party at no cost to the landowner. It would be appropriate given the scale of the Government's ambition for the scheme if advisors could be accredited and attend regular CPD as ELM evolves.

We feel that the budget should be prioritised for the farms and that the advisory and administration costs need to be carefully managed. That's said the quality of the outcomes will be influenced by the design and delivery of the scheme. It's in the Government's interest to ensure that performance is maximised and one way to achieve this is to develop better frameworks to provide support and guidance.

15. We do not want the monitoring of ELM agreements to feel burdensome to land managers, but we will need some information that shows what's being done in fulfilling the ELM agreement. This would build on any remote sensing, satellite 35 imagery and site visits we deploy. How might self-assessment work? What methods or tools, for example photographs, might be used to enable an agreement holder to be able to demonstrate that they're doing what they signed up to do?

ELM will be a substantial investment for the Government and we recognise that the scheme requires a monitoring and evaluation framework. The new ambition to move towards results or outcome-based approach is a step change for the industry and the applicant will need to understand what good average and poor looks like? In this respect some of the tools developed by the PBR pilots in Ireland and England are worth reviewing as they provide basic score cards and resources that should be accessible to most farmers and if required their advisor. These also give guidance as when to monitor and electronic reminders could be issued to agreement holders (habitat or species based) as a prompt to ensure they look in the right place at the right time.

Technology has a role to play where it is user friendly and alternatives are provided for those with low ICT skills. This sector is evolving but often costs of equipment or software are high and therefore not viable for individuals or even group approaches i.e. digital trackers for cattle on commons. We would like to see support in ELM to unlock these techniques particularly where the data gathered can be used to evidence delivery of actions or outcomes. In the past there has been too much 'greyness' about interpretation of agreement performance and we welcome a framework that is clearer and accountable for both parties. Perhaps ELM needs to work with partners across Government to look at issues such as internet access and also consider partnerships with phone providers to look at 'app's designed to support the scheme.

We welcome the approach of using digital images to confirm actions or record outcomes. This may be all that is required for Tier 1 agreements but we would anticipate a higher degree of scrutiny for Tier

2 and 3. In these instances perhaps payments should include an element for specialist advice which might support any inspections or monitoring requirements? Our hope is that any new system will acknowledge the pressure and strain placed on farmers by inspections and will be based on the regulator supporting the farmer as opposed to a punitive and bean counting approach. Any enforcement should likewise be measured and proportionate and both parties should be clear from the outset as to what this framework looks like and where and how to seek advice if needed. It also needs to take into account factors outside the control of the agreement holder. In the uplands this might cover issues such as wild fire and weather events all of which should be considered under the 'force majeure' scope.

It would also be useful if the Government agencies can work together to reduce the need for on farm time by sharing information and data. An example would be CTS being able to confirm registered native breed animals are alive and on a holding linked to a specific outcome. There may be some value in looking at links to accreditation schemes although this could disadvantage those that are not currently participating.

16. Do you agree with the proposed approach to the National Pilot? What are the key elements of ELM that you think we should test during the Pilot?

We are supportive of the national pilot and we hope that some farmer groups from Dartmoor will apply to participate continuing some of the work through the Test and Trial process. As well as the systems that support the scheme we would like to see practical actions on the ground. These should include what an agreement looks like, the role of advice and how collaborative agreements can deliver on a landscape scale. We would envisage the pilot taking place both on upland in byre and common land.

17. Do you have any other comments on the proposals set out in this document?

We welcome the opportunity to comment and wish to extend our interest in continuing to input and participate during the evolution of the scheme. The Steering Group see ELM as pivotal to the survival of upland farms and it's therefore imperative that both the scheme and its incentives are designed to meet the needs of our community.