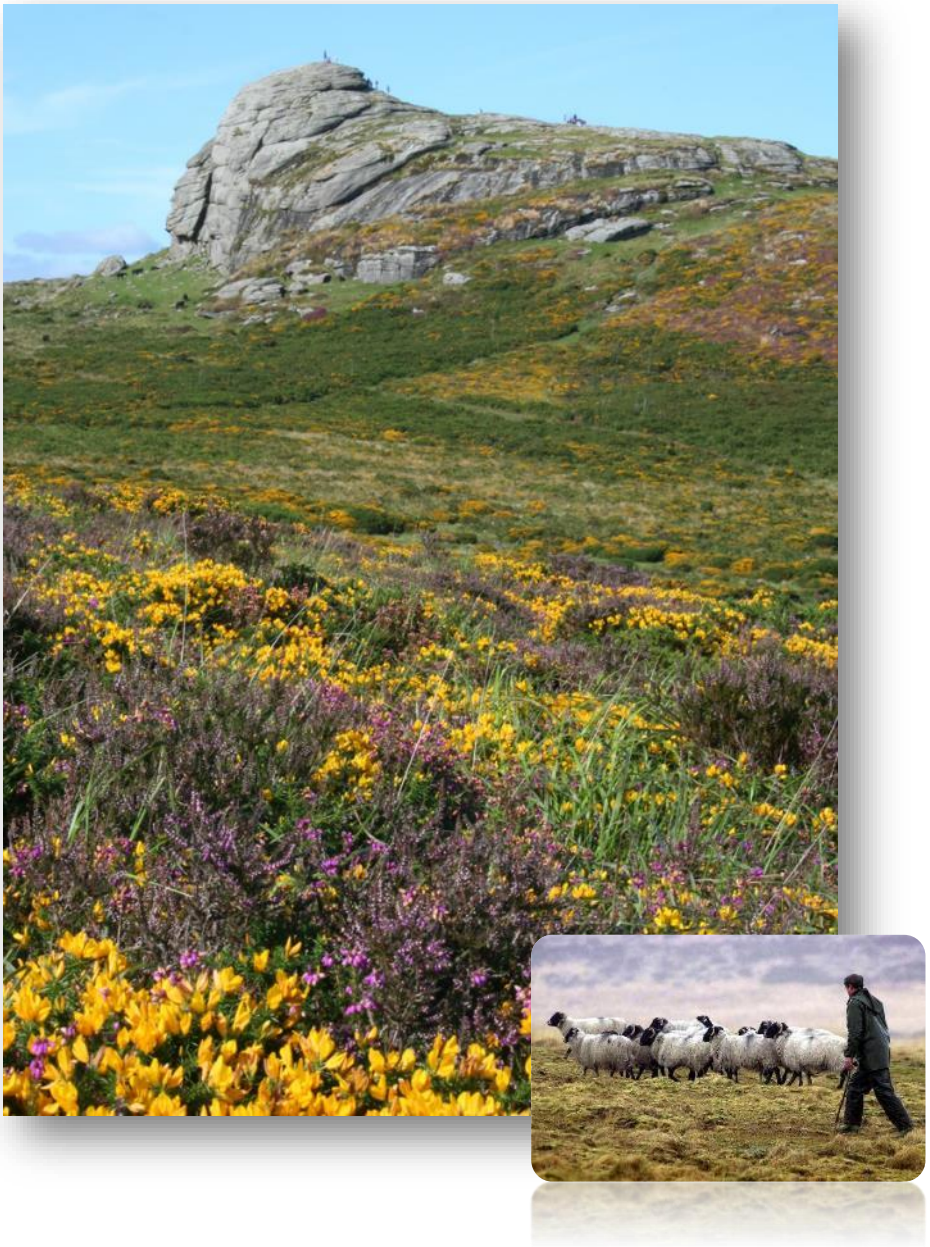
Independent Evidence Review of Protected Site Management on Dartmoor



The Dartmoor Hill Farm Project

Evidence Submission

The Dartmoor Hill Farm Project (DHFP) exists to contribute to the viability and continuation of farm businesses on Dartmoor and where applicable help sustain the special qualities of the National Park.

The DHFP is sponsored and supported by Dartmoor National Park Authority (DNPA), The Duchy of Cornwall Estate, The Royal Countryside Fund and by Farmer contributions through a Contributors Scheme.

The Steering Group is constituted as follows:

- 9 representatives of the Dartmoor farming community
- 2 next generation representatives
- 1 representative of the Dartmoor Commoners' Council (nominated by the Commoners' Council)
- 1 farmer representative on the board of the GD LEAF
- 1 representative of the Duchy of Cornwall Estate
- 1 representative from an agricultural industry professional
- 1 member of DNPA (appointed by DNPA)
- The DNPA Head of Conservation and Land Management
- The DNPA Director of Conservation & Communities or DNPA Chief Executive by rotation

This paper is submitted on behalf of the Steering Group membership.

Russell Ashford

Chairman of the Steering Group

Background to Dartmoor

Farming along with forestry make up almost all the National Park's land uses and are the bedrock of the local economy. Within the defined area 86% (82,313 ha) is utilisable for agriculture and 12% (11,242 ha) is woodland (11.8%). A majority of the agricultural area is unenclosed moorland and rough grazing (49% of the National Park) and the remaining 37% is enclosed farmland, mostly permanent pasture. There are 842 farm businesses on Dartmoor in 2021 the majority privately owned with an employment level of roughly 1900 people. Of these 503 are Less Favoured Area livestock units with 266 at 50 Ha or more in size and 576 below 50 Ha.

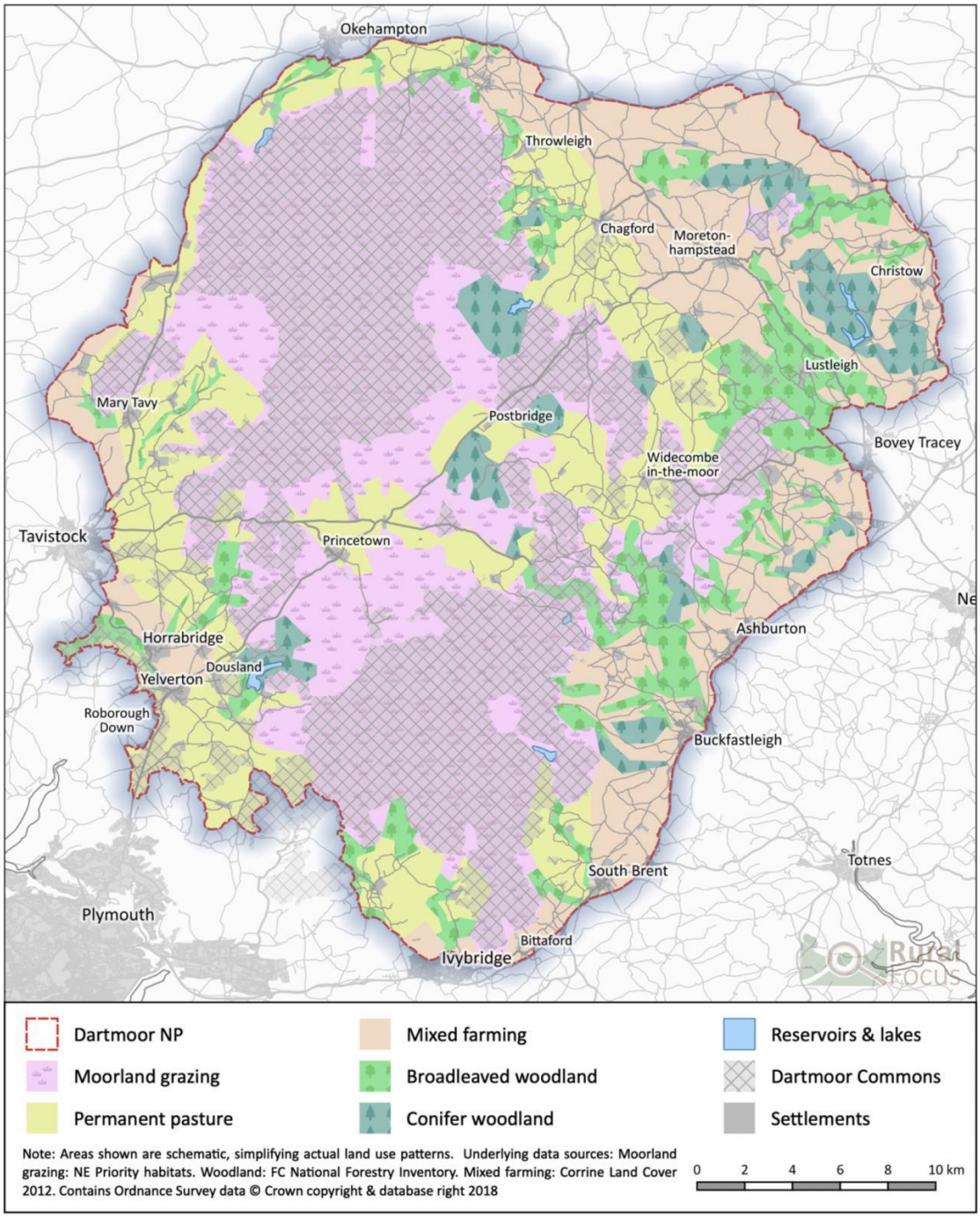


Figure 1: Land Use in Dartmoor National Park

Unenclosed and rough grazing, consisting of heather moorland, mire, grass moorland and rough pasture, is the main agricultural land use, covering around 46,000 ha. This occupies the central swathe of land in the National Park. Enclosed permanent pasture makes up most of the rest of the farmed land, at 39,780 ha (2021). Other farmland consists of temporary grassland (3,233 ha in 2021), arable crops (2,324 ha in 2016) and horticultural crops (110 ha in 2021). As shown in Figure 1, these land cover types are dispersed in the north east and down the eastern edge of the National Park.

There is a right of open access on foot and horseback to 35,200 hectares of common land on Dartmoor under the Dartmoor Commons Act (1985). This was extended in August 2005 by the Countryside and Rights of Way Act which gave a new right of open access to mountain, moor down and heath extending the existing access rights to an additional 7,000 hectares of 'open country',

There are 850 farms with registered rights to graze [1]36,000 hectares (88900 acres) of common land (37% of the National Park's whole area). It is estimated that less than 200 now exercise the right to depasture livestock and this figure is falling year on year. In 2021 the breeding beef herd on Dartmoor was 13,642 cows with a breeding flock of 101,388 ewes.

At the current time farm businesses on Dartmoor are facing a period of intense challenge with the phased removal of direct support and its replacement with the Environmental Land Management (ELM) scheme. As with most upland Less Favoured Area farms income is supported by a combination of the Basic Payment Scheme and agri-environmental payments. There is a wide variation in individual performance between businesses, depending on their costs, size, structure and the productivity of their assets. However as a generalisation without the combination of these payments most units are unviable and at risk to the fluctuations of the commodity markets primarily for beef and sheep.

Dartmoor as a farmed landscape has the highest density of historic farmsteads in England, and this reflects the number of surviving small traditional family farms many of which are multi-generational. The relationship between these businesses and the grazed commons underpins the landscape and the special qualities of the [2]National Park designation. Tenanted farms represent higher percentage than the national average (40%) with several large estates of which the Duchy of Cornwall is the largest single landowner. Farm incomes are currently extremely challenged despite a number of businesses diversifying into no agricultural income.

Context of Submission

The Dartmoor Hill Farm Project was formed in 2003 in response to a foot and mouth outbreak on Dartmoor with the aim of supporting farming in recognition of the important role it plays within the National Park. This is achieved through advocacy, training and development, project work and delivery of national programmes of activity such as Farm for the Future. A steering group predominantly comprised of active framers guides the work programme with input and financial support from the Duchy of Cornwall, Dartmoor National Park Authority and the Royal Countryside Fund. Currently there is a team, of three staff (2.8 FTE) although only 0.8 FTE is permanently funded. The project is based at Princetown but covers the whole of Dartmoor and is hosted by the National Park Authority.

The view of the majority of farms we represent is that Natural England's (NE) proposals for grazing protected sites will have a negative impact on the viability of traditional family farms with knock on implications for the economy, environment and cultural landscape of Dartmoor.

[1] Dartmoor Commons Council Dartmoor Commoner's Council - Life & Traditions (dartmoorcommonerscouncil.org.uk)
[2] Your Dartmoor - Special qualities

In this paper we set out our thoughts on the issues being considered by the Review with some key points (in bold) we hope can be considered and addressed in your recommendations. As well as this submission we have helped to submit a collaborative response for the Healthy Livestock project and met the panel recently with a small representative sample of the Steering Group.

Protected Site Condition Assessment & Evaluation

We understand that the panel is unable to consider changes to existing legal frameworks that govern protected sites. However, a key issue on Dartmoor is a lack of confidence in current monitoring and evaluation techniques raising questions about whether data generated accurately reflects habitat condition and ecological status.

1. The National Parks and Access to the Countryside Act 1949 introduced the concept of SSSI's but the current legal framework is provided in England by the Wildlife and Countryside Act 1981, amended in 1985 and further substantially amended in 2000 (by the Countryside and Rights of Way Act 2000). Originally the [3]SSSI system was intended to protect a "representative sample" of species and habitats across the country and never meant to be a comprehensive or holistic nature conservation mechanism. Over the years Government has modified the framework in response to public concern for 'the state of nature' in the UK. This initially focused on targets for management actions, and latterly on the condition of the species, habitats, and geological features present. In 1999 the Joint Nature Conservation Committee (JNCC) implemented the monitoring programme for designated nature conservation sites and English Nature visited all SSSI's reporting in 2003 that 42% were in unfavourable condition. Since this juncture we have had various national targets, reports and National Audit Office Assessments culminating in a commitment at the United Nations Biodiversity Conference to conserve 30 per cent of the planet's terrestrial and marine habitat by 2030 (30 x 30).

2. **There is concern on Dartmoor that the current framework fails to represent an accurate picture of ecological condition.** The Conditions Monitoring Framework is felt by many to be a 'blunt' tool and the frequency of assessment and validation is sporadic and resource limited. Large areas of common are often assessed 'rapidly' without participation or engagement of commoners or the landowner. This inevitably leads to questions about the validity and quality of data and fails to consider broader indicators of biodiversity health and wellbeing. In recent months a number of private owners have engaged the services of independent ecologists to provide an independent assessment of site condition. **Supporting evidence submitted to the panel by the Healthy Livestock group also illustrates the dangers of unintended consequences. It raises the question of whether condition assessments properly evaluate condition and whether we need to consider revising this approach.**

3. The main tool now deployed for management of SSSI's are agri-environmental agreements with responsibility for outcomes solely vested in the agreement holders. **This fails to consider wider factors influencing vegetation condition which are regarded as complex and intangible.** In particular climate change and nitrogen deposition are likely to be playing a role in species diversity with resultant impacts on heather condition (sweetening and beetle impacts) and changes to grazing preferences of stock. In order to build a better assessment framework, we need to move beyond protected site boundaries and consider a broader

[3] NECR414 Edition 1 Sites of Special Scientific Interest (SSSIs) in England (1).pdf

range of factors on a landscape scale. **This requires a step change in traditional thinking and a more informed risk-based approach which accepts variation in feature condition with progress monitored regularly over realistic ecological timescales. An independent monitoring framework that all parties could endorse would help to re-build trust and provide a better metric for environmental quality. Delivery could be aligned with ongoing independent advice at the local level helping to combine assessment with positive change.**

4. Evidence on Dartmoor through the Farming Futures initiative highlighted **the value of graziers participating in site monitoring where this was supported.** This approach endorses local knowledge and expertise and evolves a level of skills and interpretation that helps agreement holders to understand and deliver outcomes. A good example is the Burren in Ireland where a Payment by Results (PBR) model exists with scores applied to land management. Here participants are supported to provide adaptive management which helps improve performance and embed good practice. At the current time limited agency resource has led to a fragmented and adversarial environment in which all parties feel disaffected and disenfranchised. Natural England acknowledged this point itself in a recent review on SSSI's that stated: *"Areas of current concern relate also to the intensity of implementation of monitoring and to the control of damaging activities on sites (including from external factors). "*[4]*A clear priority stressed in consultation meetings with NE staff and external stakeholders has been the need for effective, and responsive monitoring in future with clear feedback to the management of each site, thus supporting progressive improvements in site condition."*

5. A shared concern amongst agreement holders and landowners of protected sites is the interpretation of 'what good looks like'? **Greater clarity is needed to help graziers meet objectives and this links to the role of on-going support and advice**. It does also raise the question about whether the targets are achievable given external drivers such as climate change and environmental pollution. Site condition assessments don't necessarily recognise or acknowledge efforts made by commoners to move beyond baseline standards. Moving forward we need to understand what realistically can be achieved and reward progress along a trajectory of change rather than within a hard grid format. **A renewed framework which feeds into broader policy at the landscape scale could help resolve this issue**. **It's clear we need a more dynamic, integrated approach that has regard for arrange of outcomes and particularly with better integration of livestock grazing, environment, recreational and wildfire management.**

6. A better framework of advice and support would enable commoners and landowners to 'own' agreements and to have the confidence to trial new ideas. A legacy of the prescriptive agreements of previous iterations of agri-environmental schemes has been the disempowering of initiatives and a reliance on formal prescriptions. Through ELM and a more outcome focussed system there is an opportunity for commoners to take the lead and to innovate. Recent developments such as the Dartmoor Work Plan developed by the Duchy of Cornwall and the Forest Trustees is an example of a proactive approach to identify actions on the ground which align with NE's protected site ambitions.

Agreement Management

7. **In order to deliver better outcomes we feel that NE need to spatially change the way they approach agreement management on Dartmoor**. With the loss of the historic 'lears' as livestock numbers have reduced we are seeing a more fluid and transitionary pattern of

[4] Sites of Special Scientific Interest (SSSIs) in England - NECR414 (naturalengland.org.uk)

grazing. This is accentuated by changes to stocking levels for individual commons without regard to the creation of vacuums for contiguous common land units. **We would recommend a 'honeycomb' approach on a landscape scale which evaluates a group of adjacent agreements or in some instances commons with the same dominant graziers**. This could improve ecological coherence (habitats don't usually follow CL units) and feed into a better framework for monitoring and evaluation as set out above. A key issue for some commons are straying stock which are difficult to manage and can impact NE's interpretation of protected site condition. This is particularly relevant for the larger agreements which should be considered central to any workflow and discussion framework.

8. **There is a need to re-build trust and relationships on Dartmoor in order to move forward with confidence.** This relates not only to landowners, graziers and non-graziers but also to the statutory agencies including Natural England, Historic England and the Rural payments Agency. The experience of the Hill Farm Project is that a lot can be achieved by developing trust and confidence through constructive dialogue and discussion. Whilst commons can be adversarial environments, they can also produce valued collective benefits beyond the boundaries of individual agreements. This includes examples such as Wildfire Management, Peatland Restoration, Healthy Livestock Initiatives, and species recovery programmes. **A new delivery framework is needed to bring people together that can facilitate negotiation and ensure all parties are listened to and valued equally.** This should have access to relevant information and resources and where required the ability to draw in expertise. We often talk of a longer term 'vision' but we also need a formal framework within which practical delivery is made. The challenge is how to resource and facilitate a sustainable model that provides [5]continuity of support and advice. A solution could potentially be found within the multiple pots of funding expended on Dartmoor and through better integration of delivery between the main agencies and players. Some of the Irish Government funded models for PBR are worth considering as a model of area-based delivery alongside the role that larger bodies could play such as the National Park and larger landowners. We need to recognise that commoning delivers multiple public benefits and move towards a system that values and rewards these alongside SSSI condition.

9. A benefit of a coherent and collegiate dialogue between agencies is clarity of vision. A challenge for agreement holders is trying to interpret multiple priorities on a common where there is not necessarily consensus between the key players. The Dartmoor Vision was an historic attempt to provide a clear strategy for all parties to coalesce around and this identified the concept of Premier Archaeological Landscapes. Whilst it's possible to layer public goods there can also be a danger of trying to be everything to everyone particularly where you focus at a single common level. **Working at a landscape scale it should be possible for the Agencies to agree overarching integrated priorities that can be translated into practical actions within agreements. This relies however on consistency of advice and ownership by all parties of a long term and adaptive vision for Dartmoor.**

Livestock. Habitat Management and Heterogeneity

Dartmoor as a high upland area in the far southwest of England is notable both for its geomorphology, environmental conditions and historic land use. It has a unique history of transhumance and pastoral activity within the county of Devon and has its own Act of Parliament providing a governance framework for the commons. The area was designated as a National Park as early as 1951.

[5] 210991802.pdf (core.ac.uk)

10. Like most upland areas farming on Dartmoor is impacted by its elevated position, soils and prevailing weather. Despite this it compares favourably with Less favoured Areas in the north of England with a notably longer grass growing season and warmer average temperatures. Its southerly position is also relevant in terms of climate change with what appear to be increasing extremes of drought and rainfall. **An important national distinction is that our commons are also grazed by three species (cattle, sheep and ponies) and this mixed grazing practice is relatively unique for such a large unenclosed area.**

11. Historically these differences were not properly evaluated (in agri-environmental prescriptions) with agreed stocking rates much lower than the season or vegetation growth could accommodate. Farmers on Dartmoor have been receiving payments for environmental management for several decades, first through the Dartmoor Environmentally Sensitive Area (1994-2008), then Environmental Stewardship (2005-2016) and latterly Countryside Stewardship (2016 onwards). Following a high take up of the ESA scheme on Dartmoor livestock numbers were cut significantly and cattle in particular with a winter removal restriction. This followed a period of heavy grazing and higher stock numbers on the common in part fuelled by headage payments. Many farms opted to change breed and to invest in winter housing recognising that economics of hill suckler enterprises required a different approach. This release of grazing pressure and period not only altered traditional lears but it changed the vegetation loading and composition of the moor with species such as Molinia beginning to dominate. As this community established and matured palatability fell compounded by a move to reduce swaling which has continued until the present day. Additional factors such as climate change and nitrogen deposition have also played a part resulting in a homogenisation of large areas of common land and in particular the higher more exposed parts of the Forest. This has may have impacted some vertebrate species such as wintering birds with Lapwing, Golden Plover and Curlew all seeing declines as habitats change and stock numbers are lowered. **We believe that creating greater structural diversity in the landscape should be an aspiration for future schemes avoiding the blanket prescriptions over vast areas of Dartmoor. Flexibility over stocking rates and timings should engender an outcomes approach where the objective is clear and support systems are in place (advice, monitoring etc.)**

12. The increase in vegetation loading has reached a point on several commons where graziers are unwilling to swale even where NE are supportive. This traditional practice has come under increasing scrutiny but where implemented well it remains an important tool for habitat management and for livestock wellbeing. The alternative options of cutting tend to create a thatch or 'break' machinery often with inadvertent impacts on above ground archaeology. There are increasing concerns from the Fire Service about the risk of wildfire and the loss of grazier involvement in emergency response where agreements fail. There is a need to align common sense fire breaks with archeology, access and stock management to build resilience to climate change. **Coordinated management at a landscape scale is a good example of some of the less quantifiable public benefits delivered by commoning which help to de-risk potentially catastrophic incidents experienced elsewhere in the UK. Given the degree of open access to common land and the changing weather patterns the risk to protected sites from unmanaged fire is significant.**

13. As evidenced through the Healthy Livestock Project vegetation change has resulted in livestock contracting to smaller grazeable areas with a loss of heterogeneity and the creation of 'desert' areas. Livestock species graze in different ways and this creates the variation in height and cover which engineers a biodiverse landscape with different fauna associated with their dung. In the case of semi natural grasslands the dietary preferences of different grazers

have a more pronounced effect on the botanical composition of the sward in the longer term. In the current narrative on protected sites the role of grazing is often simplified to a 'mowing' tool that fails to consider wider relationships and outcomes. Cattle, sheep and ponies all graze in different patterns and the relationship between food, shelter / shade and water varies as do other factors such as weight, trampling etc. **Where three species grazing persists, it enables heterogeneity within semi natural habitats providing varied ecotones and better biodiversity outcomes. There are also benefits associated with winter grazing and evidence at sites such as [6]Gidleigh suggest where managed well this delivers good outcomes for Molinia suppression whilst supporting retention of hardier herds.**

14. Heterogeneity is not only desirable for ecology but it's also important for the commoning community at large. **Retaining a viable number of active graziers ensure differences in grazing strategy, livestock treatment and timings all of which can build greater resilience into commons management.** Quantifying these values is subtle but they can help underpin wildfire management, recreational access issues, monitoring and evaluation and cultural benefits such as local breeds and pony drifts. Where livestock reductions or grazing periods are altered this can reduce the viability of an enterprise resulting in a loss of a grazier and an historic lear. In some circumstances it also necessitates the loss of two species with ponies being removed by default due to their lower economic value. Where an upland unit loses an enterprise this increases the risk to the business reducing resilience to commodity markets and impacting overall viability. It also disincentives engagement by the next generation or new entrants who face the challenge of establishing a flock or herd on the common with the additional time and associated risks. **This highlights the complexity and implications for decision making on protected sites and the need to carefully consider the impacts beyond the common boundary. Whilst this lies outside NE focussed remit it has implications for the special qualities of the National Park which is also protected by statute with a broader regard for economic and cultural health of the community.**

15. Changes to commons and livestock reductions have all had impacts on animal health and welfare. Ectoparasites and ticks in particular are increasing with the most common being *Ixodes Ricinus* known as the sheep tick and is the vector for a number of diseases which affect livestock such as louping ill, tickborne fever (TBF), babesiosis (Redwater fever), and tick pyaemia. The same ticks can also transmit Lyme disease (Borrelia) as well as louping ill and tickborne fever to humans, dogs and horses. On Dartmoor as elsewhere in the UK the sheep tick is widespread and prefers dense vegetation and warm, wet conditions to support the free living stages of its life cycle. Traditionally tick related illness tended to be focussed on the three warmer months of the year but with climate change is now often reported in winter. Contributing factors to Tick expansion are complex but in the south west the milder climate, changes in vegetation types and management and Deer numbers all play a part. These impacts are faced by humans as well as livestock in the National Park and initiative such as Optick reflect a growing concern about the degree of exposure. In some parts of Dartmoor graziers have opted to stop utilising commons due to a combination of vegetation change and tick challenge where welfare and performance has been significantly compromised. There is a need to recognise the wider value of livestock acclimatised to a landscape and that long periods of de-stocking can result in significant challenge to welfare. Sheep as an example lose their resistance to Louping Ill within a few months and bought in stock if exposed on the common will die within days. Currently there is no vaccine available for this virus although Moredun are trying to bring one to a commercial trial at the current

[6] Personal comms. With A. Crabb – DNPA Archaeologist and Historic England Representative

time. **As with protected site evaluation we need to consider animal health and welfare on a broader scale and to recognise the additional challenge and costs associated with grazing semi natural landscapes. Currently under the Sustainable Farming Incentive (SFI) there is no 'commons' option for collaborative health schemes which could integrate other strands such as the Farming Investment Fund.**

16. **We believe that Dartmoor is at a critical point in both the numbers of active commoners and the availability of livestock to deliver the outcomes required on Protected Sites**. Commoning is an intrinsic strand in Dartmoor's culture and farming community and is key to the viability of many businesses. Further livestock reductions are unlikely to deliver the heterogeneity advocated in our submission and will result in further concentrations of animals within the reducing grazed zones of palatable grassland. There is also the danger we are at a critical point of balance and that further change or 'over steering' may lead to an irreversible change. Knowing when and how to intervene relies heavily on the assessment of SSSI condition and what is achievable over time. Currently on most commons the expanses of Molinia, Gorse and Bracken are consolidating so it's hard to see how further stock reductions will improve this situation. Biodiversity associated with a pastoral landscape is also being squeezed with the exception of some specialist species. **What we feel is required is a more dynamic and creative response to commons that combines active interventions with improved stock management.** Commons have struggled to fit into a European model of support and the legal framework which should post Brexit allow for greater creativity in the way we model and structure management and payments.

General Observations

17. We believe we need to be bolder and more passionate about the role grazing livestock play and to put in place some longer term monitoring and evaluation programmes to holistically evidence impacts. There is a good base of evidence emerging of different vegetation pilots and the ability to use [7]technology to aid targeted stock management where conditions allow. **Commoners need to own and understand schemes** and in this context models such as PBR have a role to play where performance is rewarded against a known grid or framework. There are clearly challenges with these models, but this type of incentive could catalyse outcomes for protected sites. There is also the opportunity to tailor the framework at the local landscape level rewarding performance that is better aligned with local conditions.

18. **It would be helpful to see NE and other key players coordinating funding and future programmes of work across Dartmoor whilst piloting new initiatives on the ground**. These might include different strategies for grazing alongside new pro-active active habitat management. It's important these proposals are realistic, costed and well thought through. They should also consider the suite of public goods including archaeology and access integrating delivery with conservation management where appropriate.

19. An observation of the past five years would be a lack of celebration or championing of the positive aspects of farming and environmental management on Dartmoor. **Alongside a change to the current narrative on Protected Sites we need to re-discover the ability to celebrate, share and endorse best practice where it occurs.** This is important both for farmers and the general public to get an insight into the range of public goods delivered

[7] HFP No Fence Pilot 2021

through schemes and collaborative action across Dartmoor. Mental health is an increasing issue given the uncertainty businesses are facing and has clearly impacted those involved in this discussion at the grass roots and agency level. **There is a need for those involved in shaping future policy to evaluate implications for health and wellbeing and to carefully consider how and when they communicate.**