

# Response ID ANON-65QX-SAWP-F

Submitted to Consultation on Future Agricultural Policy Proposals for Northern Ireland  
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## Introduction

A What is your name?

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C What is your organisation?

Organisation:  
Chartered Institute for Archaeologists (CIfA) & Council for British Archaeology (CBA)

## Resilience Measure

1 The proposal is that payment will continue to be area based, use entitlements and that funding will be directed to active commercial farm businesses.

1. (i) Do you agree that income support is needed in the form of a Resilience Payment set at an appropriate level?

No

Explain your answer.:

We are disappointed that NI government, unlike all other parts of the UK, has not taken the opportunity to set out a more ambitious move away from a Basic Payment System model of a flat rate area-based rate for subsidy – a system which has proven to have only limited effectiveness at stimulating environmental outcomes and has created other perverse outcomes for farming innovation and productivity. We feel that a system of public money for public goods which has a view to developing productive agri-food industry sustainability through profitable payments for farmers acting as environmental stewards, along with financial incentives to support innovation and sustainable farming practices would represent a far more positive approach to long term improvement.

We welcome the statement that over time money will move away from a Resilience payment towards the Farming for Nature package, but there is no timetable set out for this. Coupled with the fact that the Resilience proposals do not attempt to integrate environmental improvement goals, it seems hard to believe that this could become a central plank of future schemes.

We support a basic level of gateway payment for observing minimum standards, retaining at least the same standards as existing cross compliance measures and maintaining GAEC requirements. It is disappointing that no enhancements from current minimum standards are proposed. For instance, to encourage incremental improvement in minimum standards, or which bring additional benefits such as enhanced monitoring. For example, to enhance GAEC 7, farmers in receipt of basic resilience payment could be required to provide condition information (e.g. digital photographs) on historic features. This would be a low impact, high value outcome which would provide improved baseline information about condition and could help guide more advanced scheme options.

1. (ii) Do you agree that farm businesses that solely produced grass/grass silage for sale during a historic reference period should not be eligible to claim the Resilience Payment?

Not Answered

Explain your answer.:

1. (iii) Do you agree that businesses that maintained land in a state suitable for grazing or cultivation but undertook no further agricultural activity during a historic reference period should not be eligible to claim the Resilience Payment?

No

Explain your answer.:

While we support effective policy measures to discourage perverse effects of the subsidy, such as landowners seeking to undertake minimum activities for the primary purpose of receiving subsidy, we are concerned that the proposed policy could result in a reduction in environmental standards on such land, by removing the incentive of some landowners keep land in GAEC standard. This would effectively remove all protections for many historic features, the vast majority of which are not subject to statutory protection (only 5% of sites are scheduled monuments)

An improvement would be to include a partial payment for maintaining land in accordance with minimum environmental standards (e.g. to incentivise the preservation of hedgerows or historic features). This would also potentially allow for landowners who do not undertake intensive farming activities envisioned by the FAPP to pursue an environmentally beneficial stewardship role.

1. (iv) To give effect to the proposals relating to grass selling businesses and those maintaining land in GAEC, do you agree that an historic year or years should be used to restrict the allocation of entitlements for Resilience Payment to farm businesses which met the following criteria: (a) had cattle or sheep registered on APHIS; and/or (b) had at least 3 ha of an arable or horticultural crop during the reference period in an historic year or years?

No

Explain your answer.:

As above, we would like to see all land incentivised to, at minimum, maintain GAEC standards. We recognise that farms below 3Ha may have a lower level of agricultural productivity, but all land plays a role in ensuring environmental improvement. This policy disregards environmental improvement as an outcome of resilience payments and could enable smaller, but significant, parcels of land to fall below minimum standard, leading to, harm. Some effects of this – for example the preservation of historic landscape features - could be irreparable (as once those features are destroyed their value is gone forever).

2 The proposed conditionalities outlined to be eligible to claim the Resilience Payment are aimed at environmental improvement.

2.(i) Participation in soil testing, including Light Detection and Ranging (LiDAR) – do you agree with this being a condition to claim the Resilience Payment?

Yes

Explain your answer.:

As explained, we support the use of straightforward conditionalities aimed at environmental improvement. We welcome use of LiDAR for the suggested environmental improvement aims.

However, at present, while the FAPP promises in its introduction to have a concern for the historic environment, there are no protections beyond GAEC 7 compliance which actively seek to understand or manage impacts of agriculture. In the past, agri-environment schemes have incentivised farmers to notify government of historic features on their land. New approaches through FAPP could build on this by requiring condition reporting and maintenance, either as a condition of basic payment, or as an option under Farming for Nature.

With this in mind, we also suggest that where LiDAR imagery is being analysed this could also be used to identify heritage features on farms to improve baseline understanding of the historic environment on agricultural land. We recommend that DAERA discusses this and other opportunities with DfC, as it would be a very small additional cost and would contribute to the FAPP's stated intention to influence the "integrity of the historic environment that [is] passed to future generations".

2. (ii) Preparing a Nutrient Management Plan (NMP) based on the soil testing and LiDAR information – do you agree with this being a condition to claim the Resilience Payment?

Yes

Explain your answer.:

See above answer 2.i.

2. (iii) Recording of sire data on APHIS/NIFAIS for all calves born on both dairy and beef herds - do you agree with this being a condition to claim the Resilience Payment?

Yes

Explain your answer.:

See above answer 2.i.

3 The proposal is that progressive capping of the Resilience Payment will apply above £60,000 and that the minimum claim size should be increased to 10 ha.

3.(i) Do you agree with the proposal that progressive capping of the Resilience Payment will apply above £60,000?

Not Answered

Explain your answer.:

3 (ii) Do you agree with the proposal to increase the minimum claim size threshold to 10 ha?

No

Explain your answer.:

As above, we would like to see all land incentivised to at minimum, GAEC standard. We recognise that farms below 10Ha often have a low level of agricultural productivity, but all land plays a role in ensuring environmental improvement. This policy disregards environmental improvement as an outcome of resilience payments and could enable smaller, but significant, parcels of land to fall below minimum standard, leading to, harm. Some effects of this – for example the preservation of historic landscape features - could be irreparable (as once those features are destroyed their value is gone forever).

If entitlement was restricted to farms smaller than 10Ha, this would cut out a significant proportion of farms, and while these farms may be less agriculturally productive, they are no less environmentally significant. If this proposal is carried through, FAPP must ensure that conditionality measures are also applied to Farming for Nature to catch as many of these smaller sites as possible.

4 The proposal is that there will be a new crisis framework that will enable the Department to assess potential risks and determine the most appropriate intervention for a specific crisis.

4 (i) Do you agree with the principles proposed in the development of a Crisis Framework?

Not Answered

Explain your answer.:

## Farming for Nature Package

14 What are your views on the suggested policy proposals and environmental principles to be incorporated within the Farming for Nature Package?

Farming for Nature:

We are concerned that there is no consideration of heritage or the historic environment in any of the 8 operational policies and no mention of landscape character. This is despite the historic environment being explicitly mentioned in the introduction of the FAPP document and recognised as an issue which is affected by our decisions relating to agriculture.

We believe that it is vital that this package explicitly sets out funded actions which can contribute to the understanding and positive conservation of heritage features such as earthworks, standing monuments, historic buildings, and landscape features such as historic hedgerows and stone walls. These options should be aimed at creating benefits such as ensuring future contribution of assets to landscape character, sense of place, community wellbeing, and tourism.

The existing Environmental Farming Scheme includes options for such things as stone wall repair, even though this option is not primarily undertaken for its contribution to landscape character and heritage. This falls well below the standard of most other UK approaches to agri-environment schemes, where the impact of agriculture on the historic environment, landscape character, and tourism is expressly recognised.

We therefore believe Government should take this once in a generation opportunity to introduce funded actions for the historic environment. These should include: taking historic and archaeological features out of cultivation, and the maintenance of known heritage assets in good condition (e.g. scrub clearance, erosion protection, etc). Capital grants for historic building and monument repair and reuse would also be a positive inclusion and would go some way to arrested the overall decline in condition of heritage assets on rural land that is recognised in the SEA review of FAPP proposals.

In the past, agri-environment schemes have incentivised landowners to provide information on the existence of historic features on farm land, so there is precedent in past schemes to build on in FAPP.

Our fundamental view is that landscape and historic environment features are inseparable from natural environment in terms of management, with benefits often overlapping. Including these options within the scheme would bring Northern Ireland into line with protections in other parts of the UK.

We urge DAERA to liaise with the Historic Environment Division of the Department for Communities to develop options for trialling actions.

15 What are your views on proposals to prioritise actions through environmental improvements to reverse the trends in nature decline by creating and restoring habitats that are important for species diversity?

Farming for Nature:

16 Do you agree with the proposed eligibility criteria and minimum claim size proposals?

No

Explain your answer.:

We do not accept that there is a minimum appropriate land area for environmental improvement actions. It makes little sense to pursue landscape scale strategic change while creating a patchwork of left-behind smaller sites.

17 Do you agree with focusing on the habitat management actions listed as an initial mechanism to kick start improved awareness and capacity to manage environmental assets?

Not Answered

Explain your answer.:

18 Do you have specific suggestions for other quick win management actions?

Farming for Nature:

As suggested, current Environmental Farming Scheme does not include funded actions for the conservation of heritage features or the removal of archaeological sites or features from active cultivation. Many of these features are highly significant contributors to landscape character and distinctiveness, historic significance, including archaeological interest, as well as often contributing to other environmental outcomes such as by creating habitat for wildlife and reducing flood risk. They will also be a driver for other public goods such as access and wellbeing, as well as economic outcomes such as recreation and tourism.

These options are relatively easy to implement, often cheap, and benefits are easily measurable. English and Welsh agri-environment schemes have included these options for many years. We strongly suggest their inclusion in FAPP.

Agri-environment schemes represent the clearest vehicle for the management of the majority of heritage assets that exist on agricultural land as the infrastructure is already in place, including the mapping of known assets on any farm that is part of the scheme. The opportunity for positive funded actions could greatly improve the overall downward trend facing heritage assets currently

19 What are your views on proposals to introduce 'Test and Learn' pilots?

Farming for Nature:

We welcome the inclusion of the Test and Learn proposals. As discussed above, however, as the introduction of FAPP provides a generational opportunity to reflect on the broader purpose of agricultural subsidy, we urge DAERA to consider pilots which would explore how the impacts of agriculture on historic environment and landscape could be embedded within funded actions for the FAPP. We therefore urge DAERA to discuss options for Test and Learn pilots which look at historic environment funded options with DfC.

20 Have you specific suggestions for other components that could be incorporated into 'Test and Learn' pilots?

Farming for Nature:

As above, we urge DAERA to discuss with DfC to explore the possibility to set up a test and learn pilot on heritage options for funded actions. This would be appropriate moment to trial the above suggestions, and examples for scheme actions exist in other UK nations. We can provide further advice on these options.

21 What needs to be in place to support delivery of an outcome-focused approach? Explain your answer.

Farming for Nature Package:

22 Have you specific suggestions for partnership delivery models that will encourage collaborative working?

Farming for Nature:

## Controls and Assurance

46 Do you agree with the proposal to replace the current Cross Compliance system with the simplified 'Farm Sustainability Standards'?

No

Explain your answer.:

We support the retention of all GAEC7 measures within the proposed FSS3.

However, Principle 1 suggests that legislation will be used for enforcement as a method of simplifying cross compliance. However, some GAECs, for example GAEC 7 include measures which are not subject to statutory protections. For example, most landscape features are not protected by statutory designation. It is only GAEC7 which protects them. The proposal must avoid enabling new threats to heritage assets which are not designated.

In addition, certain statutory enforcement mechanisms are difficult, costly or unproductive. A more flexible system of agri-environment compliance measures, potentially backed by civil sanction, could be a more effective and efficient tool.

47 Have you specific suggestions for how compliance with the proposed Farm Sustainability Standards should be controlled? Explain your answer.

Controls and Assurance:

We would welcome a system of civil sanction that could help to ensure that scheme participants respect statutory requirements, as sometimes legal enforcement is difficult and enforcement measures costly or unproductive. We support the use of educational or communicative resources as a strand of compliance, but we do not agree with the language of Principle 3 which implies that the system will seek to avoid 'recourse to penalty'. This could give a false impression that enforcement is not taken seriously. The potential to attract a penalty is a necessary part of any compliance framework.

48 Do you agree with the proposal that the current land eligibility rules should be revised to make all agricultural land (except hard features) eligible for direct payment under future area based schemes?

Not Answered

Explain your answer.: