

## 1. Introduction

- 1.1. CPRE is the countryside charity that campaigns to promote, enhance and protect the countryside for everyone's benefit, wherever they live. CPRE works with communities, businesses and government, nationally and locally, to find positive and lasting ways to help the countryside thrive – today and for generations to come.
- 1.2. For our countryside to thrive, it is vital that the agriculture sector is diverse and resilient – with opportunities for new entrants to the sector, clear targets to tackle the climate and nature emergencies, accessible fully funded advice and guidance, long-term funding commitments, and guarantees on standards in future trade deals.
- 1.3. CPRE, the countryside charity, welcomes the direction of travel outlined in the Agriculture Bill. It is right to move away from the area-based payments of the Common Agricultural Policy, which are widely regarded as inefficient and ineffective. There are already numerous examples of the farmers doing the right thing to enhance the environment on their land, but this is too often in spite of the CAP, not because of it. Reforming farm payments so in future they focus on paying 'public money for public goods' and incentivise nature-friendly farming is one of the most important steps the government can take to tackle the emergency facing our climate and environment.
- 1.4. The Bill has seen positive changes since it was tabled in September 2018, such as recognising soil health as a public good and establishing a multi-annual funding framework. However, more improvements are needed. The Bill should be amended to:
  - Support and provide clear routes for new entrants to the sector, including through a **refreshed and adequately funded county farm model**;
  - **Establish in law that UK farmers will not be undercut in trade deals** that allow imports of cheaper food produced to lower environmental, food safety or animal welfare standards;
  - Set out a **long-term direction of travel for regulation** of the sector after we leave the EU;
  - **Provide independent, expert advice and guidance** to enable farm businesses of all sizes to access new payment schemes;
  - Support farming across all of our countryside, from peri-urban areas to the uplands.

## 2. Public Money for Public Goods

- 2.1. **The guiding principle of the Agriculture Bill, that public money be paid for the delivery of public goods, must be maintained.** Such an approach will help tip the balance in favour of the majority of farmers who want to do the right thing for the environment – effective design of new payment systems will help harmonise farming with the provision of environmental benefits, moving us past the belief that environmentalism and farming are in opposition.

## 3. Future payment mechanisms

- 3.1. While the approach of public money for public goods is correct, it must be **adequately funded, with a long-term mechanism and duty on the Secretary of State to identify the level of funding needed to achieve positive outcomes** for the environmental purposes listed in Clause 1(1). This independently assessed need

must then be used in setting the budget available for and within the Environmental Land Management (ELM) schemes. It may be that the Office for Environmental Protection established through the Environment Bill would be well-placed to provide this independent advice.

- 3.2. There are currently unanswered questions about the allocation of funding between different objectives, and uncertainty regarding the overall quantum of funding available. For farm businesses to trust the system and fully participate, the government must provide long-term certainty on this point through legislation.

#### 4. Advice, support and guidance

- 4.1. **Payment schemes to drive environmental improvements will only be successful if they are trusted and therefore widely taken up by farmers. They must also reflect the urgency with which we must tackle the crisis facing nature and the climate.** It is therefore vital that funding options remain available and attractive for farmers through Countryside Stewardship providing options to improve the environment on their land before the full roll-out of ELM in 2024. There must also be clear, targeted advice and guidance for all farmers to access new schemes.
- 4.2. *Countryside Stewardship* – While the ELM national pilot must be appropriately funded, it is vital that other opportunities for environmental improvements are not lost while the scheme is being developed for roll-out nationally – restoring habitat, tree-planting, and improving management of peatland could all be delivered now by farmers enrolling in current and modified Countryside Stewardship schemes between 2020 and 2024.
- 4.3. There must be clarity that those participating in the schemes will continue to be required to meet current regulations. To maintain confidence in the schemes and ensure farmers engage with CS schemes before ELM is nationally available, the Treasury must guarantee funding for the lifetime of new Countryside Stewardship agreements. HMT and Defra must work together to plan for a smooth and equitable transition to ELM that will incur no financial loss for farmers as a result of changes to their contracts.
- 4.4. *Advice and guidance* – ELMs will only be effective if there is broad take-up among farmers across the country. **This means application to participate in the schemes must be straightforward, with advice available for farm businesses of all sizes to support entry to ELMs** as well as long-term support on meeting regulatory requirements and delivery of elements of a contract.
- 4.5. It is possible that to participate in ELMs farmers will need to produce land management plans, identifying how their farming practices could change to provide environmental benefits. They will also need to identify individual business cases for participation in ELM, where reducing use of expensive inputs, such as chemical fertilisers and pesticides, and switching to agroecological approaches could improve profit margins.
- 4.6. However, the Defra Future Farming Evidence compendium demonstrates that the majority of farmers do not currently engage in practices such as budgeting, assessing gross margins or making in-depth profit and loss accounts. Even among the top performing quartile only 44% of farmers complete such accounts; in the bottom quartile this falls to just 17% of farm businesses.
- 4.7. As a result, small- and medium-sized enterprises that lack the resources or time to carry out such activities would be particularly disadvantaged in accessing ELMs. **It is essential that smaller farms are supported with free advice to help prepare land management plans.** There will be transactional costs to delivery of such advice, but enabling engagement in the schemes across all farms in a landscape, regardless of their size, would provide better environmental outcomes, especially connectivity of habitats, and therefore better value for money.

- 4.8. While the Bill includes powers to delegate the provision of advice, it includes no requirements on how that provision should be framed and developed. The Bill should be amended to make clear that support will be available to all farmers, particularly smaller businesses. Advice should be provided in ways that support those enrolling, and seeking to enrol, on schemes, and should particularly seek to engage 'harder to reach' farmers. The rejected Committee Stage Amendment 14 would have gone some way to providing this clarification.

## 5. UK standards and trade

- 5.1. The government has made numerous statements suggesting that food hygiene, animal welfare and environmental standards will not be weakened as a result of new trade deals after we leave the EU. However, as yet there is no legal obligation on government to guarantee that there will be no regression of standards, nor is there an obligation to guarantee farmers are not undercut by imported food produced to lower standards.
- 5.2. **It is essential that the bill includes legal safeguards on trade standards, to ensure that farmers in the UK are not undercut by imports of food produced to lower standards.** We must avoid a deregulatory 'race to the bottom' on standards that would undermine the positive direction of travel outlined by the Bill and policy statement.

## 6. Net-zero emissions from agriculture

- 6.1. It is right that Government has committed to an ambitious legislative target of net-zero greenhouse gas emissions by 2050. The NFU has demonstrated leadership in setting a more ambitious target for the agriculture sector to reach net zero by 2040. This should be supported with clear commitments to changes farming practices in the long-term, rather than relying on as yet unproven technologies such as bio-energy carbon capture and storage.
- 6.2. Climate mitigation is one of the public goods for which funding would be available under Clause 1(1), but given the urgency of the crisis facing our climate, **the Bill could go further to promote measures to lock-up carbon for the long term.** This is particularly important when the UK is not currently on track to meet existing targets for the 4<sup>th</sup> and 5<sup>th</sup> carbon budgets.
- 6.3. Rejected Committee Amendment 11 would go some way to improving the Bill on this point by ensuring support for agroecological farming practices, including organic farming, which will be crucial to producing food that is both climate and nature-friendly. Rejected Committee Amendment 13 would have clarified that steps to improve soil quality must include restoring vital peatland habitats such as blanket bog. Emissions from peatland soils are mostly not reported as part of UK greenhouse gas emissions yet. At 23 MtCO<sub>2</sub>e in 2017 they are equivalent to half of emissions from UK agriculture. **Restoring drained peatlands to turn them from a source of emissions to a sink would provide multiple benefits, including slowing the flow of floodwater, improving water quality, and helping tackle the climate emergency.**

## 7. County Farms

- 7.1. County farms are owned by local authorities and provide opportunities for letting to young and first-time farmers, sometimes at below-market rents. They are a vital first step on the farming ladder, and are especially important to bring new blood to an ageing sector. [Reviving county farms](#), a report prepared for CPRE by Shared Assets, NEF, and Who Owns England?, shows the opportunities county farms offer are sizeable, but their extent is in long-term decline.

- **The area of England’s county farms estate fell by over 15,000 acres between 2010 and 2018, a decline of 7%.**
- Local authorities interviewed for the report recognised that their county farm estate offered significant local benefits, opportunities for income generation, and training opportunities for new farmers.
- County farms are well placed to deliver social and environmental public goods through Environmental Land Management schemes, and could be test-beds and exemplars of nature-friendly farming methods such as agroforestry.

7.2. Defra Ministers have previously supported the principle of providing a specific funding stream for county farms. The Agriculture Bill offers an opportunity to refresh the purpose of county farms, and put limitations on the net loss of county farmland to protect this vital resource.

7.3. Committee NC5, below, would **require local authorities to reassess their holdings and review their purposes to ensure that this public land provides public goods.**

#### “Smallholdings estates

1. Every smallholdings authority which immediately before the commencement of Part 1 of this Act holds any land for the purposes of smallholdings shall review the authority’s smallholdings estate and shall, before the end of the period of eighteen months beginning with the commencement of Part 1 of this Act, submit to the Minister proposals with respect to the future management of that estate for the purposes of providing–

- a. Opportunities for persons to be farmers on their own account;
- b. Education or experience in environmental land management practices;
- c. Opportunities for increasing public access to the natural environment and understanding of sustainable farming; and
- d. Opportunities for innovation in sustainable land management practices.

2. For the purposes of this section, “smallholdings authority” has the same meaning as in section 38 of the Agriculture Act 1970.”

#### 8. Peatland

8.1. **There is an urgent need to improve the management of peatlands, lowland and upland, in a sustainable way.** CPRE has supported calls for the end of burning peatland for game management. These soils are increasingly vulnerable to a heating climate, and continued burning damages their ability to act as long-term stores of carbon.

8.2. Unrestored peatland emits high levels of carbon. To meet our climate targets, both blanket bog and upland moorland must be kept in a natural wet state. This would also reduce the risk of peat wildfires, support flood prevention measures, and reduce erosion to improve water quality. The Committee on Climate Change has recommended a target to restore at least 50% of upland peat and 25% of lowland peat. This is at the lower end of ambition, and it is essential that the Agriculture Bill encourages debate about how this minimum can be achieved, and improved on.

8.3. **As the climate changes, we must accept that in some areas our rural landscapes will also change.** The ELM payments should not seek to preserve landscapes in aspic, but promote changes in land use in ways that enhance landscapes, promoting greater diversity across landscapes, while enhancing biodiversity, conserving water resources and soils.

#### 9. Delinking and ‘lump sum’ payments

9.1. In *Health and Harmony*, the government outline an objective to increase opportunities for new entrants. We are concerned that without conditions on the receipt of lump-sums, farmers using them to retire may sell their land to larger holdings or out of farming altogether. We acknowledge the varying desires and

circumstances of farmers and their families, some of whom may wish to remain involved in their farms while other may wish to release capital by selling land.

- 9.2. **We suggest that receipt of ‘lump sum’ delinked payments should be made conditional on using the money to prepare the farm to better deliver the purposes of Clause 1 (delivering public goods) or Clause 2 (improving productivity), or making the land available to new entrants, share-farming or for community ownership.** Committee Amendment 74 would also go some way to achieving this.
- 9.3. The government has previously suggested that the mechanisms for lump sum payments will be subject to future consultation. At the very least, this should be confirmed during the debate on the Bill.

*Proposed Amendment:* “Clause 13, page 11, line 7, at end insert:

(4) Payment of a lump sum is conditional upon the payment being used for:

- (a) transitioning the farm to a system that delivers the purposes outlined in section 1.1; or
- (b) improving the productivity of the farm; or
- (c) the farm land, for which the entitlements are held, being made available to rent or buy, or via a share-farming agreement, to new entrants or a community land trust.”

## 10. Peri-urban farms

- 10.1. **Green Belts and other parts of the urban fringe are vital in providing access to nature from towns and cities.** They help prevent sprawl, and often include prime agricultural land. Some of this land, for example around Brighton, benefits from National Park or AONB designation. However, in other cases there is a particularly intense pressure to change the use of peri-urban land to accommodate housing developments or infrastructure projects. For example, the amount of farmland within the boundaries of Greater London decreased by 7% between 2013 and 2016, according to the Defra Agricultural Survey. Furthermore, a lot of other common peri-urban land uses such as airfields, golf courses, and horiculture could be better integrated with achieving public goods in the terms set out in the Bill, in particular for nature conservation and access.
- 10.2. CPRE believes a key factor in explaining the regular loss of peri-urban farmland is the lack of long-term investment. In 2009 just 53% of Green Belt land was included in agri-environment schemes, compared to 67% of the wider countryside – and this proportion is only likely to have decreased. There is currently little or no integration between agri-environment schemes and alterations of Green Belt land coverage increasingly occurring through the planning system. It is not clear to what extent ELMs will seek to address these problems. **CPRE believes there should be investment in peri-urban areas under ELMs as these are areas of potentially high value for urban populations and often readily accessible.** They are however at particular risk of being degraded precisely because they are attractive locations for development.
- 10.3. ELM and other mechanisms for funding environmental enhancement should give consideration to how the natural world, and access to it, can be enhanced in peri-urban areas through more sustainable land management practices to take advantage of the positive effects of such public goods for urban populations. There needs to be better integration between ELM and planning policy so that, where sites are allocated for development, they do not attract public goods payments for environmental benefits that will be lost through future development.
- 10.4. Committee Stage of the Agriculture Bill provides an opportunity to probe this issue further with Ministers, highlighting the need for future payment structures to give consideration to support for producers in the urban fringe – promoting local supply chains, while enhancing the countryside close to where people live.

*Proposed amendment:* ‘Clause 1, page 3, line 17, at end insert – “farmland” includes all peri-urban land that has not been previously developed”.

*Explanatory statement:* This amendment confirms that all undeveloped peri-urban land would be eligible for financial assistance, including land in productive use in the urban fringe where there may be uncertainty arising from planning policies.

- 10.5. 'Peri-urban' should be defined as all undeveloped land up to 5km beyond the urban edge of all settlements with populations greater than 100,000 people; or other land defined as Green Belt in a development plan document produced by a local planning authority. The definition should however exclude land designated as National Park or an Area of Outstanding Natural Beauty as such land is already likely to benefit from ELMs as currently proposed.