

Dear Sustainable Land Management Team,

Thank you very much for the opportunity to respond to the **Proposals for the Glastir Scheme, Part of the Rural Development Plan for Wales 2014-2020**.

Below please find a synthesis of comments received from officers representing a range of expertise across the three Welsh National Park Authorities (NPAs):

Snowdonia National Park, Pembrokeshire Coast National Park, and Brecon Beacons National Park. These comments are presented, generally, in the order they appear in the consultation document, starting with introductory materials and general comments. These comments are then followed by responses to the prepared questions posed as part of the consultation. We hope you find these responses constructive, allowing for the Glastir Agri-environment scheme to improve as it matures.

Introductory sections and summary statement

1. We note and welcome the statistics outlining the uptake and success of the Glastir scheme to this point. We recommend that evidence is provided to indicate that Glastir is delivering positive outcomes for biodiversity. It would be useful to have appropriate indicators which illustrate what Glastir has done for the uplands and commons. How has biodiversity benefited, for instance? It is possible, through appropriate monitoring, to differentiate between what benefits can be attributed to Glastir rather than another mechanism or natural variation.
2. We would suggest that there needs to be a greater recognition of underlying issues with Glastir. From our experience locally we would suggest that the scheme is not as attractive as the previous Tir Gofal scheme. Local stakeholder knowledge and understanding about Glastir is lower than it was for Tir Gofal. The latter benefited from regular liaison meetings, which were curtailed when the scheme was taken over by Welsh Government (WG). We highlight that the three Welsh National Park Authorities have established a liaison group with the WG's Glastir Team, and this exchange of information and feedback on scheme implementation is working well.
3. We welcome the idea of incentivising carbon and water noted on page 9. Page 12 notes that commons are important for delivering carbon and water quality but

this seems incongruous with the lack of support for areas above 400m following CAP reform recommendations.

4. We note that there have been issues with the system under Glastir Advanced in that the GIS layers did not take into account local expertise and were therefore incomplete, precluding many farmers from potentially beneficial schemes. The principle behind the mapping is good but needs to include more time in assembling and validating the underlying data sets.
5. We support Glastir Efficiency grants. The fact that there has been little take up/tailing off is disappointing, though. It would be beneficial to understand why this has occurred. Farmers may lack understanding of the benefits. Could micro hydro and solar options be included? We also note that the need for significant capital outlay is a factor contributing to poor uptake.
6. We would suggest guarding against further limiting the consultation process for woodland creation and by-pass other important habitats such as unclassified peatlands or grasslands which are important habitats in their own right under other WG initiatives and WBAP habitats. For Glastir Woodland Creation, we are concerned that sites that support existing habitats of principal importance to Wales (Section 42 Natural Environment and Rural Communities Act 2006), are already being planted up, which contradicts the aims and objectives of the Wales Biodiversity Partnership. Therefore any revision of the red/amber/green mapping needs to identify and safeguard these habitats.
7. Glastir schemes could usefully be designed to expand the area of wood pasture in Wales, as a happy medium between permanent pasture and semi-natural woodland.
8. Article 18 makes a good point, but we would be concerned if the damage is due to inappropriate use of natural resources and/or alterations to the environment that resulted in the damage (e.g., flooding due to land drainage).
9. We note that Common Land elements should include a management plan for the common as a prerequisite, and payment limits should be proportional to the size of the common, e.g., a minimum capital grant of £25k, and its complexity/prescriptions for desired outcomes. A larger common may require

more work and may be able to deliver wider benefits such as sustainable catchment management. We welcome the inclusion of a single scheme.

10. We acknowledge that assistance is required to generate better value agreements, but our concern is that the delivery mechanism could be streamlined. There should be a straight forward delivery mechanism.
11. Please note that the “innovative ways of working” cases referenced in the consultation document are borrowed from templates that were drawn up and delivered by NPAs. These include Common Land agreements and our input to the four Mynydd Du Glastir Commons Schemes, as examples. Our input has achieved significant added value for Contract Managers and commoners alike, which will lead to benefits for biodiversity and landscape. These observations further enforce the benefits of local input and stakeholder engagement.
12. We welcome the WG’s intent to ready Glastir farmers to attract more investment from the private sector. Giving farmers more scope to attract private sector investment through demonstrating more innovation for achieving environmentally beneficial outcomes on the farm has long been supported by the National Park Authorities. We believe that a market-based approach will help the agencies to re-position themselves to offer the role of expert advice and facilitators. A prime example of this role has been demonstrated by Officers of Snowdonia National Park Authority in the expertise they have provided toward rhododendron management. This is the role that NPAs have and continue to play for farmers.
13. Commons have greatly benefited from the expertise and impartiality of Commons Development Officers, whom we believe have been fundamental to the successful level of Glastir Commons schemes started. We believe that this successful model demonstrates that face-to-face involvement is essential to building trust; online applications shouldn’t be the only way forward.
14. If Contract Managers regularly share their good practice, this will ensure that the advice provided by individual Managers is consistent and maximises flexibility. It would also be of great benefit if they are encouraged to establish local liaison groups. The successful assistance that the National Park Authorities have

provided to Glastir Contract Managers in helping to develop and finalise Glastir Advanced contracts, for example with the four Mynydd Du Glastir associations.

15. We welcome a more flexible approach to the content and scope of Glastir contracts, though we acknowledge that this will cause more administrative hurdles too.
16. Stating that “*It is likely that, by next year over 60% of Welsh Common Land will be sustainably managed within the Glastir scheme,*” is likely to be an over-statement of what will be achieved. Only through surveillance and monitoring, i.e., hindsight, will we know if the land has been sustainably managed. Of the 181 Common Schemes achieved by the end of 2014, only 32 of these will be under Glastir Advanced; so sustainable outcomes are a way off.

Other General Comments

Access:

17. There is limited discussion of access, access provision, permissive access, Local Access Forums (LAFs), and related issues. Greater emphasis could be given within the `Glastir Advanced` to improve access provision (including existing PROW), especially targeting access within designated areas and areas of higher recreational value. It would be useful, as well, to have maps of farms that have entered the scheme (not landownership details but just maps) to enable public rights of way officers to check that entrants are complying with their obligation to ensure that public rights of way are accessible.
18. The reliance solely upon Local Access Forums (LAF) to approve detailed permissive access opportunities has proved problematic as it is considered that LAFs, whilst being important contributors in terms of both democratic involvement and the principles, do not have the detailed knowledge or flexibility to input effectively and efficiently.
19. Local Authority and National Park Authority Rights of Way (ROW) managers are in a good position to assist with Glastir permissive access opportunities.

20. Essentially it is important to include NPA ROW officers in Glastir consultations because of their local knowledge and ability to respond in a timely fashion. LAFs meet too infrequently.

Historic Environment:

21. The historic environment does not seem to have been given due consideration, especially when compared to other outcomes such as biodiversity, carbon capture, water quality, etc. The historic environment does not seem to be included in discussions of, for example, stocking levels in the uplands, use of mixed grazing in the uplands, bracken control, and in relation to the common scheme. Upland commons are places where archaeological and other historic environment remains have survived well, thanks to centuries of low impact management regimes. Nevertheless, land management processes, particularly in uplands, such as tree planting, drainage, flooding, grazing, burning, while providing seemingly positive outcomes can also be extremely detrimental to our cultural and historic landscapes. Natural processes also provoke change, both desirable and undesirable.

22. Upland commons are so rich in heritage assets they could almost be considered as historic landscapes in their own right. It is worth remembering that the historic environment is the canvas upon which all development both benign and malign has impacted since the last ice age. It is finite and irreplaceable.

Targeted Glastir Consultation Questions and Responses:

Q1: Do you agree with the Welsh Governments' proposals for rationalising the framework of agri-environment support under the next RDP?

23. We welcome greater flexibility in the context of the previous comments.

24. We welcome additional advice as outlined in Appendix 2, though it might be useful to train up members of farming unions and utilise existing advocates from the farming community who have been through the process and can act as local advisors. Giving contract officers more flexibility and ensuring they are consistent in their advice is important.

25. We strongly support inclusion of cooperative schemes, though the implementation will need to be thought through in great detail given variations in social and cultural dynamics locally.
26. We believe that in the current climate and with fiscal constraints, this approach poses a good way forward to target higher value natural resources. However we urge that care is taken to ensure that negative outcomes are guarded against with the removal of basic level agreements. Compliance with basic requirements should be guaranteed before applicants are allowed entry to the proposed new Advanced agreements.
27. With respect to 3.1.2 Common Land element, consideration needs to be given to assisting boundary repair works to be undertaken. Boundaries are one of the key issues facing common land management causing mismanagement and neglect and increased tension between commoners and land owners; they are vital in terms of landscape value. It would empower commoners to repair boundaries where private land owners have no interest in maintaining stock-proof boundaries.
28. We recommend that, in line with Article 35 of the Rural Development Regulation, Commons Development Officers consider offering advice to associations on registering for charitable status or forming social enterprises to drive and set objectives for their work in future. WG is in effect asking of Commoners/Graziers Associations is to become project managers. However, this is not an obvious skillset for them, whereas taking the charitable or social enterprise route would introduce this approach as part of the necessary business planning process. Given our successful track records through our Sustainable Development Funds, National Park Authorities would be willing to assist with this work.

Q2: Do you agree with Welsh Government's proposals to improve engagement with land managers under the next RDP?

29. In principle we agree with 3.3.2, though it is not clear what evidence is available that biodiversity gain and/or ecosystem services are being improved.

30. We also welcome the idea of simplifying the scheme and limiting options to those that provide significant environmental benefit. We believe the key to success is that WG engages with land managers in a clear, concise and effective manner. We welcome the introduction of local facilitators; this is an excellent idea. It can be developed so that the facilitators are 'grown' from within the farming profession under the Green Growth agenda. This might also read across to skills development under the RDP and under the £6M Nature Recovery Fund.
31. In Section 3.2 the current advice and support proposal appears complex. We believe that a project officer structure would be easier to administer and manage and be clearer for end users.
32. 3.2.2 and 3.2.3 We welcome the use of new technology, however this is not suitable to all bearing in mind lack of broadband coverage in several rural areas, Spam mail filters, black spots in mobile reception and the age of client base and understanding of communications. Access to broadband and technical proficiency issues within rural communities have been identified by NPAs and other local authorities throughout Wales. If it is the only system, then unfortunately it will reach a limited audience.
33. Interactive applications can be developed, but in a phased manner to ensure availability for all customers and that the equipment required is freely available locally to overcome some of the above issues. With several divisional offices being closed people with no broadband/computer access will be disadvantaged, having to drive significant distances to make applications; this would also be detrimental to the effort to increase uptake. Further, online applications would need to be supplemented by ground-truthing. There is therefore a risk that online applications will lead to a decline in the necessary skills held by Contract Managers to develop effective contracts if they rely solely on online applications; and the quality of applications, and outcomes thereof, will not be guaranteed.
34. 3.2.4 Landscape co-operation projects are welcomed approaches. We suggest that the NPAs are a suitable and eligible delivery mechanism for these.

Q3: Do you agree with the Welsh Government's proposals for future implementation of the Glastir Entry scheme under the next plan?

35. We accept that financial limitations may regulate availability and that there is a need to prioritise. We request that landscape quality be included as an important weighing factor in the scoring.
36. It may be possible to add an even higher tier of Glastir above Advanced, e.g., a business incubation loan to those farm businesses/co-operative farm partnerships, that develop a market-facing business plan. This would enable those farms to move away from the Glastir Entry payment as they graduate onto the market-led phase of the contract. They would need to have 'earned their stripes' through Entry and/or Advanced first however. This might also provide an incentive to farm businesses to avoid treating Glastir Entry as top-up income by giving them a trajectory to aim for.
37. When considering the removal of certain options that have had poor take up, we recommend running a prior audit to ensure that the reasons for poor take up are not linked to unrealistic payments.
38. We recommend that the WG considers hosting annual regional seminars or conferences for Glastir farm businesses, to give them a forum to share ideas and best practice and to celebrate their achievements.
39. We recommend that any prioritisation for the Entry scheme takes its lead from the area-based approach being developed under the Environment Bill. Prioritisation of schemes should include those that are best placed to deliver environmental benefits and geographic considerations, not "or".

Q4: What are your views on the Welsh Government's proposals for supporting capital investments under the next plan?

40. Dry stone walling, pollinator action, invasive species control, hedgerow planting, pond creation, etc. are all key elements of sustainable resource management. Glastir would benefit greatly from their inclusion. We welcome the addition of a small grant scheme to support this and support the inclusion of a cap on grants.
41. We strongly welcome the single modernisation support scheme to young farmers and new entrants.

42. We welcome the small grants scheme for small woodland and scattered trees and recommend that this is extended to include wood pasture.

43. We recommend that Glastir Advanced supports the maintenance of dry stone walls and hill walls/fences. These features are principal components of the landscape in many places in Wales, but they lack sufficient investment for their long term maintenance. If included in the scheme, Glastir Advanced would offer the only likely source of investment for their repair and maintenance.

Q5: What are your views on Welsh Government's proposals for supporting sustainable uplands through agri-environment measures?

44. We support the principles proposed in Section 5 as key first steps to address issues of sustainable uplands.

45. We support mechanisms to encourage mixed grazing in the uplands for the reasons described and recognise the difficulties and practicalities of grazing cattle and ponies on the hill.

46. We welcome policies to control bracken through mixed grazing and other mechanisms.

47. We strongly support additional prioritised targets for moorland and farmland above 400m, particularly with the loss of Pillar 1 support. This element is particularly important in BBNP and SNP and across Mid-Wales. This should apply to common land and land which is not common land.

48. We welcome all opportunities that will deliver National Park purposes and improve the condition of features within National Parks. However we have some concerns in about the suitability of works in some circumstances. Issues that need to be addressed are whether they are the most needed works to be undertaken and if they are in strategic locations (e.g., walls and invasive species). We welcome the move to support infrastructure to assist large animal handling in the uplands, but this will need to be done sensitively in high landscape value areas. Excessive/inappropriate fencing and obstructions to access and the visual impact need to be avoided, particularly within the historic landscape. We also welcome flexibility in seasonal adjustments to grazing

regimes. We would welcome receipt of further detail of quality control of materials, species choice, and workmanship associated with these prescriptions.

49. Through the RDP and in partnership with food retailers, there is a significant opportunity for WG to promote aims to eliminate food waste, especially the disposal of perfectly edible farm produce that never makes it to the supermarket shelves.
50. We are, however, concerned by the argument in section 3.5.1 that agri-environment schemes have led to undergrazing in some upland situations. Experience gained by the three Welsh National Park Authorities indicates that reasons for undergrazing in the uplands are linked directly to the plethora of drivers affecting hill farming; agri-environment schemes have played only a very minor role in this, if any. This certainly is not the reason for a decline in livestock in the hills of the Brecon Beacons National Park for example, where, until the advent of the Glastir Commons Scheme, there were no agri-environment schemes operating in the uplands, yet livestock numbers have fallen dramatically nonetheless.
51. As an example of the complex drivers that affect hill farming, the hill ewe reproduction rate is now significantly higher than 100%, closer to 150% or 200%. For a hill farmer, this may be as much a negative as a positive because with limited in-by land to graze the additional lambs on, this forces the farmer to buy-in feed or to push additional ewes onto the hill/common, to the detriment of the hill vegetation and the farmer's profit margins. A more fecund ewe, producing more and larger lambs (from a cross-bred animal), means potentially better returns at market, but this is also likely to produce an animal less suited to the hill. Additionally, with an increasingly cosmopolitan and ethnically mixed market to sell to, tastes and demands are changing, which may or may not militate against the hill lamb. This is just a simple example.
52. Therefore we request that the WG to be cautious when stating that it "*wishes to maintain farming in the uplands and grazing area.*" Now is an opportune time to reflect on what can be sustainably achieved in the uplands of Wales during the next 50 years.

53. The low Pillar 1 payment for farms above 400m may serve as a disincentive to carry on farming, with the risk that former small family farms are amalgamated into larger, less sympathetic lowland units, who are then subsequently offered agri-environment incentives to emulate the farming practices of the small family farm they've just bought.
54. We recommend that through a combination of Glastir and the RDP, farms above 400m are offered the opportunity to become, through the development and implementation of a suitable (and RDP-accredited) farm business plan, "high nature value farms", who are offered their own support network through the RDP, including incentives to young farmers and new entrants to take this route.
55. A shepherding option could be introduced for Glastir Advanced; aiming to support mixed grazing to the uplands needs more eyes and ears on the ground and this can be achieved through shepherding. This might also be a viable option for a new entrant.
56. The potential risks associated with bovine TB are likely to act as a disincentive for mixed grazing options. If it was not for this restriction, flying herds might be an option to pursue, particularly where farmers are not willing to invest in their own cattle but would see the benefits from applying cattle grazing to rough vegetation for a period. It may be worth exploring these options further in light of the associated risks.
57. Bracken has not developed on the hills in response to historic undergrazing. It has developed in response to a change in grazing pressure, i.e., the historic shift away from mixed grazing and mutton flocks to single species grazing, i.e., ewe flocks. This has led to larger numbers of smaller animals, ewes, that are not physically capable of tackling or moving through a range of tougher vegetation, be it bracken or *Molinia*. The historically heavy grazing pressure exerted by large ewe flocks has created sheep walks that have encouraged bracken to move, phalanx style, up the hills, using the horizontal sheep walks as 'staging posts' for rhizomes to push past.
58. The mechanical cutting and crushing of bracken is unfeasible on steep side slopes such as those in the Snowdonia and the Brecon Beacons for example. In

these areas, the best successes have been achieved through the application of Azulox, by aerial spraying and follow-up knapsack or lance spraying. Crushing and cutting is suitable for flat ground or gentle slopes and of course several associations still harvest bracken for winter bedding.

Q6: What are your views on the Welsh Government's proposals to support woodland management and creation under the next RDP?

59. We welcome the policies to support woodland management and creation, but not at the expense of other, priority habitats across Wales. The consultation process should retain formal consultation and be more inclusive of key organisations and landowners. Those with local knowledge who understand the constraints that may be particular to a given area will provide value added.

60. Additional support through grants and advice for woodland creation and management should focus on the appropriate management of native broadleaf trees which, if managed appropriately, could produce significant natural resources as well as long term forest products promoting Welsh character (e.g., Welsh oak products).

61. The Red/Amber/Green map has worked well for the Brecon Beacons National Park and has limited the volume of consultations received by the Authority. We recommend that whilst reviewing the RAG map, the WG would benefit from the help of the Wales Biodiversity Partnership and PONT (the Welsh Grazing Advice Partnership) to develop a parallel offer for sites, such as local grazing schemes, where woodland creation is not suitable owing to the presence of other S42 habitats (and S42 species) there.

62. We strongly recommend that prior to the approval of a Glastir Woodland Creation scheme, every site is surveyed properly in order to identify whether or not it supports S42 habitats and species. This should be a minimum requirement, paid for through an initial "site suitability survey" grant prior to the submission of a full application.

63. We recommend that the WG investigates the potential economic and ecological performance of newly created wood pasture, as well as ffridd/coedcae, including carbon sequestration, water infiltration, landscape and biodiversity improvements.

64. Our understanding is that woodland creation requires the following in National Park areas:

- a. Formal consultation only if EIA threshold is met (2ha in NPs and within 300m of sensitive areas)
- b. No RPW register only NRW EIA register
- c. UKFS standards have to be met
- d. Revised opportunities map with green areas only identified with presumption for woodland creation in these areas
- e. EIA rules still apply in these green areas
- f. Glastir scheme rules require all relevant biodiversity and habitat protection issues to be considered in scheme design.

65. Given these requirements, we offer the following comments:

- a. As yet it is unclear how the Woodland Opportunities map will be revised. Accuracy of boundaries and in National Parks the ability to take account of landscape or not, is a major issue.
- b. The EIA process has to date had little impact on habitat loss. Enforcement has also been a problem when land use change has occurred without consent. Our concern is that with the focus for consultation being the requirement for an EIA, a process that has cost and time implications, there is no incentive to engage. With a 2 hectare threshold in NPs it is possible that landowners will effectively be encouraged to undertake small plantings without grant support or consent on sensitive areas. These areas might not be easily observed until detrimental changes have occurred. The temptation to plant trees on land that appears less useful could lead to further habitat mosaic losses. We are therefore concerned that piecemeal loss will continue to occur, driven by a WG scheme.
- c. Whilst the Glastir scheme is designed to avoid damage to existing biodiversity and habitats, this depends on the knowledge, especially local knowledge, of the Glastir Officers involved. Of repeated concern

has been the consideration of the land put forward in isolation, without a broader overview of the habitats and biodiversity of adjacent land and within the wider landscape. As National Park Authorities we work at both a landscape and local level with habitat networks very much at the core of our work. It is this aspect that we would bring to the table in any consultation, local knowledge that takes time and continuity to build up. As yet we do not have the confidence in the current set up to ensure that we will get a good enough understanding of the processes at work on the ground that may be impacted by any proposals for new planting without any informal or formal consultation.

- d. Loss of the public register except for EIAs is not generally a problem. However it is extremely useful to have access to information on felling or planting, especially where this is consented. We regularly get calls from people concerned about changes that affect the National Park. Access to the countryside comes with concern for the countryside and change of any sort within our special areas gives rise to concern. Unless there is some form of notification/register whether with consultation or not we are not able to respond to these concerns and therefore not necessarily perceived as doing our job as a National Park Authority. If we know where something is going on with consent we can also know where something is going on without consent. There needs to be some access to information on Glastir schemes, however this might be presented. To date it has been difficult to share Glastir information at any level and we believe this is to the detriment of both habitats and the biodiversity that these support.
- e. If UKFS are met then this should be tied in to a certification process.

66. The above points could easily be addressed and must be if this option is implemented. Additionally:

- a. The Woodland Opportunities map needs to be a work in progress and will require updating as our knowledge develops.
- b. Any loopholes need to be guarded against.

- c. Both NRW and RPW staff should work closely with those with local knowledge and take account of landscape issues in National Park areas.
- d. All schemes should be recorded on an accessible database. This shared knowledge should help all those delivering any form of countryside activity, from footpaths to Management Agreements.

Q7: What are your views on the Welsh Governments' proposals to improve targeted interventions under the next RDP?

67.3.7.1 We support initiatives to evaluate working guidance given to contract managers and other policies which give contract managers flexibility in delivering optimum benefits for farmers and the environment.

68.3.7.2 We recognise the inherent problems associated with GIS layers containing broad scale data. This has been encountered on land holdings within the National Parks. We support efforts to refine and update data layers which should include a broader suite of organisations with the local knowledge and expertise. However, improvement to the data layers should be undertaken rather than removing layers completely from consideration as many of these layers may pertain to significant natural, cultural and economic resources—i.e, key ecosystem services.

69. We would also like to suggest that landowners need to be targeted. For example, with Marsh Fritillary or Southern Damselfly, it is highly unlikely that landowners in a potentially suitable area will apply to the scheme. Equally we are encountering farmers who have apparently been told that grazing their marshy grassland will benefit Marsh Fritillary even where there is no possibility that this will happen. Similarly, the inadequacy of the information layers is creating a situation where important opportunities are being missed as Glastir officers do not have the relevant information to hand. This is where information fed in at a local level would be of benefit, with Contract Officers having the confidence to accommodate third party input from expert groups.

70. We welcome the addition of a part-farm scheme and the pilot of a habitat network approach. Considering the influence, experience and contacts that we have

already and that several proactive engagement schemes that have been established and delivered effectively by NPAs, we consider that an opportunity has been lost not to use National Park Authorities to pilot a part-farm habitat network scheme. By way of examples we have experiences and successes through programmes such as Rhaglen Tir Eryri, the Pembrokeshire Grazing Network and most recently through the assistance provided to Glastir Contract Managers on Mynydd Du. We would welcome an invitation to tender as delivery bodies for the part-farm habitat schemes.

71. As a minimum NPAs would wish to be consulted in full when the areas are identified.
72. We would welcome the addition of some spatially targeted elements to serve particular habitats and species.
73. We reiterate our support for the WG to use the RDP to develop private financing for farms that aim to manage and enhance their ecosystem goods and services and recommend that providing an 'incubation' loan, to be recouped and reinvested, is developed as an additional mechanism.
74. We express some concern about the viability of organic payments. We recognise that these are a short term investment but highlight the risk that these are taken to supplement income and subsequently revert to conventional systems. Is it value for money?
75. The small grant scheme will need assurances on quality and strategic nature.

Q8: What are your views on Welsh Governments' strategic targets for Glastir and its proposed budgetary allocations under the next RDP?

76. In principle we agree with the strategic targets for Glastir and its proposed budgetary allocations under the next RDP. Do the targets need to be refined slightly to make them realistic and achievable even though they contain valid aspirations?