

CAMBRIAN MOUNTAINS SOCIETY/ CYMDEITHAS MYNYDDOEDD CAMBRIA
RESPONSE TO THE SUSTAINABLE FARMING SCHEME CONSULTATION
6 March 2024

Question 2 response:

The increase in woodland cover which the Scheme promotes will be very welcome provided that farmers in the uplands are incentivised not to fulfil their obligation by increasing monoculture conifer cover for timber production, the encroachment of which over all other habitats is already seriously degrading the biodiversity of the Cambrian Mountains. The Scheme is not clear as to whether or not the woodland component includes existing plantation woodland, and there is no apparent restriction on planting conifers within or to expand areas of existing native woodlands. In practice, even where a plantation comprises two or three conifer species, which many do in order to meet the criterion of ‘mixed woodland’ under the woodland planting grants scheme, these are inevitably planted in monoculture blocks for ease of forestry operations. Thus most such plantations are not ‘mixed’ at all, but essentially blocks of adjacent monocultures which support hardly any other plants and animals. Forestry for timber is a separate economic activity from farming and if farmers wish to plant conifers then (subject to the necessary permissions) they can do so on an economic footing or using subsidies specific to the forestry industry.

Public money in the context of farm support should, instead, be focussed on increasing the area of diverse broadleaved trees and woods which support native plants, insects, birds and animals and enable them to survive the replacement of their native habitats with conifer monocultures, wind turbines and associated infrastructure. Restoring Planted Ancient Woodland Sites, which have been timber plantations for less than three planting cycles, should be a high priority as their potential for restoring biodiversity is greater than that of any other land category due to the persistence of complex soil ecosystems able to support rapid resurgence of native flora and fauna. Similarly, restoring the Atlantic oak temperate rainforest (which was the natural ecosystem for many upland river valleys and supports an outstanding range of flora and fauna) could bring enormous benefits both for carbon sequestration long term and for climate change resilience. Planting broadleaves alongside streams and rivers should also be incentivised, to help restore the biodiversity of their aquatic ecosystems and assist in reducing water run-off and flooding downstream. More detail in the Scheme around such measures would make a big difference to its effectiveness in delivering the SLM Objectives.

The requirement for ponds and/or scrapes on every farm, on the other hand, needs to be conditioned as to whether or not water features are naturally present in the landscape. Few areas of the Cambrian Mountains lack natural streams and pools, and the cost and effort required for farmers to supplement these may in many cases deliver little or no incremental value for biodiversity. Accordingly, provision for exemptions in suitable areas should be included.

To maximise the support for and recovery of biodiversity in the uplands – for instance tackling the spread of *Molinia caerulea* (purple moorgrass) and *Juncus effusus* (soft rush), as well as bracken - will require a specific set of land management actions. The Scheme’s preferred mix of habitats may simply not be economically viable for some of the soil types and exposure levels that upland farms experience. More flexibility and targeted actions specific to individual circumstances with readily available specialist advice well beyond the 6

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one-hour training sessions proposed at present, would greatly improve the ability of upland farmers not merely to comply with the Scheme but positively to drive nature recovery in these difficult areas.

The Cambrian Mountains include a large number of protected sites including SSSIs but also SPAs and SACs. The Scheme addresses management schemes for SSSIs but not other forms of nature protection; this, as well as support for SSSI management, needs to be addressed in the Universal Layer since there is no guarantee that farmers will subscribe to the Optional or Collaborative layer. Further, the development of a plan is of no value unless that plan is also:

- communicated, preferably not only to participating farms but also to all farms and landholders which cover a given SSSI or other protected area; and
- monitored, to ensure that implementation takes place and that actions liable to detract from the efficacy of the plan are not taken in the surrounding area.

Exclusion of SSSI areas from the Universal Basic Payment could lead to these areas receiving *less* management by farmers rather than more. Unless management of all protected areas is consistently addressed and rewarded within the scheme, which necessarily means as part of the Universal layer, there is a real likelihood that the continued degradation of these important areas will continue – as much through sheer lack of awareness as any deliberate intent to harm. For instance, many upland farmers are delighted to find out that rare birds such as curlew or golden plover are present on their land – but do not take the presence of these ground-breeding species into account when timing the burning heathlands to promote new growth. These areas must form the keystones of any large scale plan for biodiversity restoration across Wales, and their proper management should be a priority for participating farms. Treating them as secondary or indeed excluded under the Scheme, as it effectively does in its present form, sends entirely the wrong message to land managers everywhere.

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Question 12 response:

The Optional layer includes a number of ambitious possibilities, all of which will ultimately be beneficial to the contribution of farming to sustainable land management for the long term. The uncertainty over the content and timing of this layer's introduction is unhelpful, however, and could potentially cause farmers to postpone actions which might otherwise be taken at the outset of the Scheme whilst waiting to see if additional payments will become available for them once the Optional layer is fully defined. We would therefore prefer to see those Optional actions (such as management of woodlands to the UK Forestry Standard) which for instance relate directly to the Universal actions of planting and maintaining 10% woodland or 10% habitat brought into effect as soon as possible, to ensure that these components of every supported farm progress as rapidly as possible towards restored biodiversity.

The protection and restoration of water courses, both as to water supply/ flood management (direct, and through re-wetting of peatlands) and protection of streams and rivers from pollution and temperature change through establishment of planted buffer strips, are also a critical and urgent action in the face of the increasingly variable and intense rainfall which Wales' uplands are experiencing. Prevention of further erosion and contamination of water at source is well known to be far more cost-effective than remedial action, and the more so in upland areas such as the Cambrian Mountains which hold the headwaters of seven of Wales' major rivers. The value for money these actions will provide will be significantly greater if they are implemented sooner, before further damage is done.

In keeping with the implicit land use policy underlying the Scheme, efforts to engage and educate the non-farming public about the issues facing nature recovery and food production must begin as soon as possible. Much of the conflict which public access to farmed land currently causes arises from the lack of appreciation of the recreational users of the land of the work which goes into maintaining the 'natural' landscapes they wish to enjoy. Damage is done both to farms and to the flora and fauna of the uplands by well-meaning people who simply do not understand the danger which, for instance, letting dogs off leads pose to birds and other wildlife as well as to stock. Engaging with actual farmers and seeing first hand how the landscape comes to be maintained is likely to be the most effective way to instil a real awareness of the balance which farming, recreation and nature need to achieve to maximise the needs of nature recovery, climate resilience, individual well-being and food production. The establishment of accessible and joined-up PRoW and educational and practical farm stays will play a large part in bringing the different stakeholders to a more effective common understanding.

The Collaborative layer is still very poorly defined. In particular the suggestion that the Integrated Natural Resources scheme will be continued to deliver SLM objectives is unhelpful given the almost complete absence of public information about this new scheme at the time of consulting. A different series of actions is needed in the Collaborative layer to build the gains of the Universal and Optional layers into landscape-scale projects.

Finally, the potential for protected landscapes to contribute to the restoration of biodiversity and climate resilience is plain, and the local administration already in place. This potential should be supported through for instance delivering pilot schemes for actions across the full range of Optional and Collaborative actions, including for instance the promotion of smaller scale farming such as market gardening, in order to ensure that once finalised the Scheme is best fitted to meet the needs both of farmers, nature and landscape for the future.