



## THE NATIONAL TRUST

### **Review of Support Arrangements for Less Favoured Areas in Northern Ireland**

A submission by the National Trust to the  
Department of Agriculture and Rural Development Consultation  
May 2009

#### **Introduction and Summary**

1. The National Trust would like to thank DARD for the opportunity to respond this consultation on the Review of Support Arrangements for Less Favoured Areas (LFAs).
2. The National Trust works with and supports 76 farming families in Northern Ireland, managing over 3,500ha of farmed land. 78% of this is in LFA areas, with 64% ha in Severely Disadvantaged Areas (SDAs).
3. As Northern Ireland's largest conservation charity, we are committed to defending and championing natural beauty – both across the land we own and more broadly. The consultation document recognises the high level of congruence between LFA (in particular SDA areas) and areas of valued landscape and high biodiversity value: the kind of places we exist to protect.
4. The benefits people now expect from farmland include: 'environmental services' such as protection from flooding, carbon storage in soils and clean drinking water; attractive landscapes; historic features and cultural values; a diversity of wildlife and habitats; and opportunities for public access and enjoyment, as well as the production of wholesome, affordable food. These benefits are reflected in the core purpose of the National Trust.
5. As the consultation document further recognises, such benefits cannot be achieved *without* sustainable farming taking place in LFA areas: particularly in SDAs We can echo these findings from our own practical experience.
6. Without support from the LFA or a replacement scheme, several of our farming families will face severe challenges to their businesses - and we will be unable to work with them to deliver the above benefits to broader society.
7. The National Trust recognises that changes to LFA support are inevitable. We support alternative arrangements that deliver the greatest degree of environmental and public goods via sustainable farming practices in the LFA.
8. Of the policy options presented by DARD, we believe options 1 and 2 would not help towards this goal. Option 3 is most desirable, but would require substantial adjustments to be optimal. Option 4 has significant merits.

## Response to Consultation Questions

1. *Are you content that all of the relevant issues have been captured and adequately explored?*

Yes: the consultation document is comprehensive and robust.

The only issue that may have benefited from further exploration is the likely change in LFA designation criteria/LFA re-designation (as this will have a significant impact on the size and spread of any successor scheme). We recognise that it is difficult if not impossible for DARD to explore this issue in the absence of an EU-wide consensus: nevertheless, plans for future schemes should recognise that such changes will take place in the long term.

2. *Are you content with the conclusions that have been reached within the evidence chapters?*

Yes.

3. *Do you agree with Option 1 that there should be no future LFACA Scheme and that the funds released should not be reallocated to other rural development measures? If so, please explain your reasons for this choice in the context of the evidence that has been presented in this review.*

No. The review provides clear evidence that outright withdrawal would result in “significant reductions in the activity and output of LFA farm types”. This would be damaging to our landscape and biodiversity.

Such negative impacts are not ameliorated by the possibility of woodland expansion in some areas. Such expansion would be unpredictable, untargeted and potentially inappropriate. We recognise the need to restore a higher level of afforestation to Northern Ireland, but the outright abolition of support for LFA areas would be a crude and inefficient way of trying to achieve this.

4. *Do you agree with Option 2 that there should be no future LFACA Scheme and that the funds released should be reallocated entirely to Axis 1 and Axis 3 measures of the Northern Ireland Rural Development Programme? If so, please explain your reasons for this choice in the context of the evidence that has been presented in this review.*

- a. *If your choice is Option 2, to what priorities under Axis 1 and/or Axis 3 should the monies be directed, and why?*

No. Most stakeholders are agreed that reformed LFA arrangements should support the production of public and environmental goods by sustainable farm businesses in a more targeted and efficient way. While we are very supportive of the aims of NIRPD’s Axes 1 & 3, reallocation of LFA monies to these streams would not be appropriately targeted to meet such aims.

5. *Do you agree with Option 3 that there should be no future LFACA Scheme and that the funds released should be reallocated entirely to the agri-environment programme? If so, please explain your reasons for this choice in the context of the evidence that has been presented in this review.*

*a. If your choice is Option 3, should the additional monies be directed through the existing agri-environment measures, or are adjustments to the programme required (including, for example, ring-fenced monies for certain areas)? Please give reasons for your answers*

In principle, option 3 is The National Trust's favoured option for reform of LFA arrangements: but it must be significantly recast to be effective. The use of option 3 implies substantial changes to Agri-Environment (AE) programmes in general. The consultation document falls some way short of exploring what the different scenarios for this could be (not unreasonably, as the reform of AE schemes in general is not within its remit).

We prefer option 3 as it is the option most explicitly aimed at the sustainable use of land for a range of benefits – conserving biodiversity, water and carbon management, preservation of historic features and landscape protection. However, we believe that to be effective (and to achieve best value for money /widest support) in the reallocation of LFACA funds, option 3 should be recast not as an end to LFA support, but as shifting it under an AE umbrella.

The result would be an AE system with entry at a range of levels. Such a system would see LFA (largely SDA) farmers 'topped up' using ring fenced funds - in recognition that public benefits are more costly to achieve in LFA areas, and hence "would not otherwise be achieved". Qualification would require the achievement of explicit environmental standards/use of certain practices - less onerous (and requiring less monitoring) than under existing AE schemes, but more consistent than those currently achieved under LFACA.

In broad terms, such a system may help farmers and others continue to adjust to the shift from production incentives to land management incentives. That LFACA becomes a 'top-up' within AE also avoids the recognised perverse incentive of a net loss in income for the 40% of present LFACA recipients who are already in AE schemes. As such, risk of abandonment should be significantly reduced. The risks identified around loss of social capital/cultural values could be partly addressed by championing best practice grazing in the LFA/SDA as the best way to achieve qualification for this new "AE-LFACA".

Overall then, we would urge DARD to use the opportunity of LFA review to recast broader aspects of farming support: encouraging many more farms under an AE umbrella.

6. *Do you agree with Option 4 that there should be a future LFACA Scheme? If so, please explain your reasons for this choice in the context of the evidence that has been presented in this review.*

Option 4 has significant merits. We would welcome the focus on SDA, and the safeguards to ensure active management across the whole holding. The more straightforward transition that a revised LFACA would represent for current LFACA recipients could reduce the risks of abandonment.

That said, any future LFACA arrangement needs a stronger environmental emphasis than is currently the case. Ideally, this would mean an updated LFA scheme being brought under an AE umbrella (see above). If this is not possible, we would like to see significant environmental enhancement support under any option 4 type-schemes.

*a. Do you agree with the broad outline for such a Scheme that has been given and the reasons for this? If not, what changes would you like to see and why, in the context of the evidence that has been presented in this review. In particular:*

- (i) *Do you agree that the focus of future of support should be the SDA (or any future designated LFA)?*

Yes – for several reasons. Firstly, we accept the consultation document's argument that the greatest risk of abandonment is concentrated in the SDA. Secondly, while more sensitive environmental management is beneficial everywhere (and can arguably have a greater positive effect in the lowlands), we recognise the high level of congruence between SDA areas and designated habitats, ASSIs etc.

- (ii) *Do you agree that applicants to the Scheme should farm at least 10 ha of land in total (of which at least 3 ha must be in the SDA)? If not, what would you like to see as the minimum size and why?*

The limit needs to be established at a point that does not discourage 'part time farmers' as a matter of principle – such farmers can still deliver substantial environmental benefits. However a lower limit will be helpful in achieving value for money in the provision of public/environmental goods across the widest possible area. We note that 3ha is also the amount of eligible land currently needed to qualify for NICMS: it makes sense for there to be parity with other schemes. We do not have detailed comments on the broader 10 ha limit.

- (iii) *What are your views on the range of farm enterprises that would make a farm eligible for support?*

We do not have detailed comments on suitable enterprises, but would like to emphasise that these should encompass more than mixed grazing. Limited woodland creation, reduced improved grass production and other fringe schemes may be viable options. Even limited production of winter

foodstuffs for livestock could reduce the need for imported grains (and significant carbon costs associated with these). As we recognise elsewhere in this response, mixed grazing *is* a vital enterprise: but a total monoculture is not desirable.

- (iv) *What are your views on the use of minimum and maximum stocking densities?*

Grazing levels should be based on the habitat type, time of year, and environmental conditions – rather than being set at arbitrary levels. Within such a framework, minimum levels should not fall below 0.25 LU/Ha and maximum levels should not rise above 1.4LU/Ha. Under and over grazing should be addressed as part of the function of the scheme and not as a separate environmental option.

- (v) *What are your views on the use of a possible environmental option within an LFA support scheme? What sort of environmental issues could usefully be addressed by such a mechanism?*

We believe that an environmental option is not a ‘possible’ but rather an essential component of any revised LFA scheme, and a required outcome of the EU’s reform process. Issues addressed could include driving active habitat management, reflecting the objectives of NICMS. Or they could address the “New Challenges” identified under broader CAP reform – climate change, renewable energy, water and biodiversity.

7. *Are there any equality issues that you would like to raise that have not been addressed adequately?*

We have no comments to add on this question.

8. *Are there any issues relating to rural proofing that you would like to raise that have not been addressed adequately?*

We have no comments to add on this question.

9. *Are there any other issues you would like to draw our attention to in the context of this review?*

None at this time.

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### **The National Trust's vision for agriculture**

Our vision for agriculture is an industry that delivers a range of benefits to the nation from the land it uses including:

- an adequate supply of wholesome, marketable food
- environmental quality
- biodiversity
- valued landscapes
- historic features
- cultural and social benefits

In producing these, farmers will provide access and information to the public where they can be accommodated; nurture the resources of soil, air and water and their natural productive capacity, and minimise the use of non-renewable resources.

Farmers will derive their incomes from sources additional to agriculture, through rural development initiatives, thus creating jobs and contributing in a broader sense to the economic and social wellbeing of their rural communities.

Above all, agriculture will seek to play a vital role within sustainable land management and in addition to providing food, fuel and fibre, will enhance the quality of life for the millions who live and work upon, or take pleasure in, the land it uses.

### **Sustainable Farming in Northern Ireland**

We work hard to ensure our tenants and others farming National Trust land in Northern Ireland work as sustainably as possible. For example, all our land in Northern Ireland is managed within 170kg of nitrogen per hectare (combined organic and inorganic compounds).

Our farm at Ballyquintin at the very southern tip of the Ards peninsula is a great example of how farming can work to protect and enhance biodiversity. The site is significant for amber-red list and migratory bird species. Hedgerow restoration has helped the populations of Irish hare, badgers and stoats.