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THE NATIONAL TRUST WALES

RDC(3) FOU1

Inquiry into the Future of the Uplands in Wales

Response from The National Trust.

1. Introduction

1.1 The National Trust owns and manages a wide range of properties and sites in Wales, from coastline and countryside to houses and gardens. The Trust is the UK's largest non-government landowner with over 50,000ha land in Wales. It is also the UK's largest conservation charity providing access to the countryside for over 100 million visits every year. The National Trust is the largest tourism business in Wales welcoming over 750,000 visitors to its paying properties.

1.2 Around 60% of the total 250,000ha in the National Trust's care lie in the uplands, with a significant proportion of our holding and farm tenants in Wales within the current less favoured area boundary. This includes significant areas of both the Snowdonia and Brecon Beacons National Parks, and our iconic farm on the slopes of Snowdon: Hafod y Llan. The upland areas in our ownership include significant areas of common land. A high proportion of our upland land is designated for its importance for biodiversity including the Migneint SAC and Elenydd SSSI. We also own 13% of all common land in Wales, much of which is in the uplands.

2. Value of the Uplands

21. Upland areas are hugely inspirational places with a unique and high quality environment that the National Trust wishes to conserve and enhance. They provide huge benefits to the public such as access for recreation, enjoyment and spiritual refreshment; conservation of important habitats and wildlife; some of our finest landscapes; clean drinking water and an ability to help control flooding.

2.2 Upland areas are often economically vulnerable. They can feel the scale and pace of rural change more severely than other areas and in particular many upland farm businesses are beginning to feel the impacts of economic change and policy reform more than many other businesses. This raises a number of concerns around the future of land management in the uplands and the ability to sustain farming systems that maintain and improve the environment.

2.3 As with all areas of countryside, the National Trust believes that sustainable land management offers the best approach. Sustainable land management is about meeting the needs of current and future generations without depleting the resources provided by land upon which we all depend. Land provides biodiversity, scenic beauty, cultural heritage and opportunities for access and recreation. It also provides natural resources which we need to produce food, fibre, energy and building materials as well as ecosystem services supplying drinking water,

controlling flooding and storing or releasing carbon. Sustainable land management has to be multi-functional in order to meet wide ranging demands. It should also be flexible and reversible to keep options open to meet changing needs over time. Productive capacity has to be maintained with respect for all these other values.

2.4 The political and economic context that exists now is very different from that which created the uplands we know. The end of production driven subsidies raises questions about the types of farming that make economic sense and what forces will shape the upland landscapes of the future.

3. Current and emerging challenges

Biodiversity

3.1 Many upland habitats are in poor condition due to a combination of pressures including over-grazing, industrial pollution and a legacy of inappropriate land management[i]. Isolated and fragmented sites do not offer a resilient basis for habitats to thrive and adapt to pressures such as climate change. Recovering degraded habitats and populations of declining species is a key adaptation action so that they are as robust as possible to respond to a changing climate. The recommended principles to allow biodiversity to adapt to climate change[ii] suggest that good conservation of existing sites is crucial. But it is not enough to focus on designated sites such as SSSIs- the landscape as a whole needs to be more permeable to allow wildlife and habitats to thrive.

3.2 The Environment Strategy was welcome in setting targets for enhancing biodiversity. However, work to bring designated sites into favourable condition is being hampered by a lack of resources. Agri-environment and Section 15 agreements are required for remedial action on many sites but insufficient funds is available for these. We see the introduction of Glastir as a positive step but are concerned that the number of objectives for the scheme could compromise its ability to deliver unless adequate funding is made available. It seems unlikely that there will be sufficient coverage of the higher level element to deliver the Environment Strategy objectives for biodiversity.

3.3 It is crucial that a focus on designated sites is not to the detriment of other important habitats. For example, the ffridd is a rich and characteristic feature of the Welsh uplands which supports a complex mosaic of habitats. Ffridd tends to lack the protection of designation and is often under pressure from grazing when sheep are moved off mountains in winter according to agri-environment scheme required stocking rates.

Common land

3.4 Many of the most degraded upland biodiversity sites are on common land. There has been some limited success in establishing groups of commoners to cooperate and improve site management. Where this has been achieved – for example Aber Common- it has taken considerable time, and relies on commoners recognising an economic benefit of working together.

3.5 The National Trust recently established a project to investigate how Abergwesyn Common can best be managed to achieve sustainable land management. We recognised that this will only be possible through a dedicated project officer who can invest time in establishing relationships with the numerous parties involved, including around 200 registered commons rights holders. We believe that work like that at Abergwesyn will be aided by full implementation of the Commons Act. It is disappointing that there have been considerable delays to implementation and that progress in Wales is far behind that in England.

Carbon storage

3.6 The National Trust recognises that the uplands have a significant role in storing carbon. Increasingly we are managing our land to reduce greenhouse gas emissions from land, and to conserve carbon stores within soils and biomass. This will be even more important as climate change impacts increase the likelihood of soils and peatlands losing carbon.

3.7 The National Trust has recently established carbon, water and vegetation monitoring on the Migneint, an internationally important blanket bog. This will enable us to monitor the impact of restoration activities. This new project aims to restore the Upper Conwy to a healthy and robust catchment, with well managed soil and water resources. This includes a fully functioning peat bog ecosystem, and the watercourses and rivers that flow through the catchment. This means working with the local community and a range of other stakeholders. This project demonstrates the interdependence of soil and water, and the need for a management approach which recognises this. Restoring the blanket bog will have multiple benefits: increasing carbon storage, restoring and enhancing biodiversity and improving water quality. Tenants continue to produce meat and we hope that they will see economic benefits from selling a product derived from sustainable land management.

3.8 Present controls on land management were not designed with carbon objectives in mind. Glastir will help fill this gap, but there is a need for regulatory controls such as cross compliance to help conserve land based carbon. We believe that investment additional to Glastir will be required if land managers are to conserve the carbon stored in the Welsh uplands.

Water

3.9 The uplands are a significant influence on the quality of water in our rivers and lakes, and also help regulate the flow of water downstream. Over 70% of the UK's rainfall falls upon areas of hill and upland before draining to lowland water courses. Across Wales much of this area of hill and upland has been damaged, principally through production support which encouraged drainage and conversion from heath/heather moor land to grassland for livestock grazing.

3.10 The drainage of large areas or the uplands has damaged their capacity to hold water and this in itself limits their ability to buffer the impacts of sudden heavy rainfall events. Drainage has further damaged the peat soils which typically underlie these upland landscapes. There are many elements of land management

that, if applied to these landscapes, would help serve to remediate some of the previous damage done.

3.11 Management of upland areas has a significant influence on the rest of a catchment. It is essential to plan the use of water on a catchment scale, minimising environmental damage and ensuring the efficient and fair use of our limited water. On a number of estates, the National Trust has adopted an integrated approach to catchment management, looking at the role of land use in addressing issues of pollution, flooding and drought, producing a range of benefits for wildlife and for people.

3.12 Flooding is predicted to become more frequent and more intense as a result of climate change. Unless a new, more sustainable approach is adopted, flood risk management will require more and more expensive hard defences. Every parcel of land can play a part in absorbing and storing water, slowing the speed at which it moves downstream and reducing the flood risk. A recent evidence-based review commissioned by the National Trust concluded that, for small river catchments (typical of 97% of England and Wales), land management has a significant impact upon runoff and can be used as part of an integrated approach to flood management and defence. Greater attention is required on the role of land management in upland areas in influencing flood risk elsewhere.

Climate Change

3.13 The uplands face multiple pressures on natural resources as we seek to ensure food and energy security under the impacts of climate change. Added to this is the prospect of peak oil which will require a reduced reliance on oil based fuel and agricultural inputs. Upland communities and land managers will need to plan for and adapt to changed conditions such as more extreme weather patterns, water shortages and the introduction of new pests.

3.14 The agriculture and land use sector – a high proportion of this which is based on the 80% of Wales within the LFA - will also need to contribute to the Government's targets for reduction of GHG emissions reduction. Research indicates[iii] that achieving WAG's target 3% reduction is feasible based on efficiency savings and changes to agricultural practice. But according to experts including the Tyndall Centre, it is likely that a 6% or 9% annual reduction will be required to avoid dangerous climate change. This will be more stretching and will require more fundamental changes to the way the sector operates.

3.15 The need to shift towards a low-carbon diet is a challenge, both in terms of consumer behaviour change and the reliance of Welsh upland agriculture on meat production. The farming community will naturally want to protect their income sources, and there are also potential environmental benefits from appropriate levels of mixed grazing. The type of extensive agricultural system which dominates in Wales means that meat produced in Wales will have a role to play in a low-carbon society. This is a message which should be promoted so consumers support Welsh produce, and farmers do not see emissions reduction as a threat to their livelihoods.

3.16 There are opportunities for Welsh agriculture in a low-carbon society which WAG can explore and promote. Demands for non-meat products are likely to increase, for example, peak oil will result in a need for more textiles from non-oil based sources such as wool. Increased use of bioenergy heating will result in increased demand for woodfuel. These opportunities for upland farms in Wales should be researched and developed, then promoted to the farming community.

Viability of Upland Farms

3.17 Based on experience with our own farms and those of our tenants, upland farms are incredibly economically marginal and heavily dependent on public subsidy. For example, our farm at Hafod y Llan currently relies on Tir Mynydd to be able to turn a profit. We have seen a steady decline in the number of upland farms keeping cattle with subsequent loss of the environmental benefits of a mixed grazing system.

3.18 As a result of CAP reforms we recognise that in some places farmers will choose not to continue, but we know that over the vast majority of the hills, cattle and sheep grazing will remain important for the management of landscapes and habitats, and the production of high quality livestock products. Unless new sources of income are identified, many small family farms in the uplands will struggle to survive and we will face pressure to consolidate holdings into larger, more commercial units.

3.19 The Trust has long recognised the need to broaden the base of farm incomes and has supported a wide range of diversification schemes on our let farms. Some of our farm tenants have successfully diversified into tourism enterprises. Others, such as the Dolaucothi group, have worked to secure a higher price for their food products by forming cooperatives, marketing premium products and establishing processing facilities.

3.20 In many cases, upland environments would benefit from less intensive farming, but we do not see this being achieved through extensive rewildling or wholescale loss of farms from the uplands. We believe that traditional farms can adapt and evolve to help society meet the needs outlined above, and continue to play a part in the culture and society of these areas.

4. Managing the uplands

4.1 The Trust sees a need for special funding to support upland management in the short term, to ensure that people can adjust and continue to provide tourism and environmental benefits. Looking to the longer term, however, we have to question how sustainable this is – there is already pressure to phase out subsidies altogether. If upland farmers cannot make a living, it is not clear how this land will be managed.

4.2 We have outlined above some of the numerous benefits which the public stand to gain from sustainable land management in the uplands. Present public spending on land management is dominated by CAP which is not designed to reward delivery of these benefits. We believe that the CAP should be reformed so it is designed to pay for provision of public benefits and reward sustainable land

management.[iv] The first step will be to shift resources from direct subsidy to rural development including agri-environment schemes.

4.3 In this context, we see the current system of payments for less favoured areas as an interim measure to help upland farms to prepare for the future. LFA payments are based on an outdated premise where farm subsidies are linked to production outputs. In light of decoupling and the shift to an area based single payment the LFA is an anomaly with no clear objective. Future investment in the LFA –as with all CAP payments- should be based on the premise of rewarding positive management.

4.4 There is no prospect of an end to the need for public funding to pay for land management activities which deliver public benefits for which there is no market value. However, we believe that there is potential for other sources of investment to contribute:

- water company investment in land management to improve water quality at source, thereby reducing the need for expensive treatment;
- a greater share of the flood risk management budget in land management that makes space for water and reduces flood risk;
- private sector investment in land-based carbon storage through inclusion within carbon markets to help mitigate against dangerous climate change; and
- Local Health Board funding for green exercise prescriptions for people's health and wellbeing.

5. Conclusion

5.1 It is clear that there is considerable value in the uplands and considerable benefits to be secured through their management. But there are numerous options for how land is to be used and multiple objectives, some of them incompatible. For example, the familiar open vistas and grassy slopes enjoyed by walkers and celebrated by artists cannot all be retained if hillsides are to provide more wood for fuel and building. There is at present no systematic way to ensure that there is space for all these essential land uses, or identifying which is the most beneficial use of a particular parcel of land. Current policy mechanisms which shape land management are fragmented and poorly integrated.

5.2 Allied to this challenge is a tendency for people to resist change, and the common desire for treasured landscapes to remain as they are. Similarly, some farmers –by no means all- are resistant to changing their traditional systems and adopting new practice. Given that the political and economic context which shaped these landscapes and systems no longer exists, questions arise about the types of farming that make economic sense and what forces will shape the uplands of the future. These are fundamental questions for the public to consider: what landscapes do we want, what are the economic and environmental priorities for some sites, how will they need to be managed to achieve those priorities and how do we want public money to be spent to support them?

5.3 These challenges will not be easily resolved, but we believe a crucial first step is for a wide ranging public debate on the future of land. This need not be limited to the uplands as many of the issues are common to all of the Welsh countryside.

Such a discussion could improve understanding of what the public wants from the uplands, whilst building support for public investment in sustainable land management.

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[i] Biodiversity in Trust: The National Trust Wales Biodiversity Strategy 2005-2010

[ii] Conserving biodiversity in a changing climate: guidance on building capacity to adapt.' Published by DEFRA on behalf of the UK Biodiversity Partnership. Page 11. 1a Conserve Protected Areas and other high-quality wildlife habitats

[iii] Building a low-carbon economy – the UK's contribution to tackling climate change, UK Committee on Climate Change 2008

[iv] Beyond the Pillars, Wildlife and Countryside Link 2008