

Health and Harmony: the future for food, farming and the environment in a Green Brexit

A consultation response from Campaign for National Parks

May 2018

1. Campaign for National Parks welcomes the opportunity to respond to the consultation about the future of food, farming and the environment in a Green Brexit. We are the independent national voice for the 13 National Parks¹ in England and Wales. Our mission is to inspire everyone to enjoy and look after National Parks – the nation’s green treasures. We have been campaigning for over 80 years to ensure that our National Parks are beautiful, inspirational places that are relevant, valued and protected for all. As the majority of land within the National Parks is farmed, the future of support for farmers and land managers will be critical if we are to protect and enhance these internationally recognised areas.
2. This response is endorsed by all nine of the English National Parks Societies.
3. Campaign for National Parks is also a signatory to the Wildlife and Countryside Link consultation response.

Executive summary

- Campaign for National Parks welcomes the Government’s intention to move to a new environmental land management scheme that is based on the principle of paying public money for the delivery of public goods. We see the development of a new scheme as an important opportunity that will shape the future of the National Parks and we believe the new scheme must promote and support land management that enhances them.
- We recognise the importance of developing and implementing the new scheme, but the transition to it is also critical. This is especially the case for farm businesses that are known to be highly reliant on direct payments. To support people during the agricultural transition period it will be essential that there is clarity about the new scheme people are transitioning towards. Defra should not begin reducing direct payments without implementing a corresponding increase in funding that is available through the new scheme. Reductions in direct payments should also be accompanied by the availability of business advice.
- The new environmental land management scheme should seek to deliver a range of public goods and we welcome the explicit reference to enhancing beauty. We believe that different options may need prioritizing in different locations. We support, therefore, an overarching, national policy that seeks to secure a range of improvements, but within that framework we believe there is a need for schemes to be locally tailored. The National Park Authorities should play a central role for delivering this within the National Parks.
- Upland and other remote rural areas should be seen as core areas in which the desired environmental enhancements and outcomes will be achieved. Further thought should be given to ensuring a new scheme is successful in these areas. This may include considering levels of financial incentives and rewards, locally tailored options for these areas and high

¹ Within this we include the Norfolk and Suffolk Broads as part of the National Park family

quality advice being available. This will also be the case for common land, where again environmental outcomes should be the focus, but the complexity of securing those outcomes needs to be recognized and addressed in the development of a new policy.

- A new environmental land management scheme should be focused on outcomes and payments should reflect that. We welcome the recognition of the outcomes-based pilot project in the Yorkshire Dales National Park in the consultation. From visiting the pilot in the Dales, and meeting some of the farmers and advisers involved, we believe this model has the potential to shift the relationship between the adviser and the farmer because rather than prescribing actions, it recognizes their expertise and local knowledge.
- Producing and selling high quality food will be central to maintaining support for and confidence in farmers and growers. We recognise the uncertainty that our exit from the EU has created for food producers and land managers and the importance of getting new trade deals in place. We support the statement in the consultation document that ‘maintaining and enhancing our high standards of food safety, animal welfare and environmental protection will remain paramount’. This commitment must be reflected in primary legislation.

Importance of the proposals in the consultation to the future of the National Parks

4. Centuries of management have produced the beautiful and inspiring landscapes, the wildlife-rich habitats and cultural heritage within our National Parks. John Dower's report to Government in May 1944, which recommended the setting up of the Parks and identified priority areas that should be designated, saw farming as central to the special qualities of those areas. One of Dower's four founding principles was that ‘established agriculture should effectively be maintained’ and he recognised that farming in the hills required special assistance in terms of capital improvements and income support. He saw little conflict between farming in the 1940s and the distinctive characteristics of the soon to be designated National Parks.

5. There have been significant change in farming practices and society since Dower’s report was published. Much of this has been driven over the last four decades by the Common Agricultural Policy. Farming has become more mechanised and often more intensive; the use of fertiliser and chemicals more widespread; summer haymaking has been replaced by earlier cuts for silage and haylage; farms have become larger and more specialised; and small farms have become uneconomic but ever more attractive assets for non-farming purchasers.

6. Campaign for National Parks recognises the role of farmers and land managers and their important part in helping us deliver our vision for even better National Parks. We do not, however, claim that the management of the land within the Parks, and especially the uplands, has always been exemplary. While the appearance of the National Parks have been maintained and areas of them remain havens for wildlife, there are concerns about flora and fauna. *The State of Nature Report 2016* found that between 1970 and 2013, 55% of upland species declined, and 15% of upland species are threatened with extinction from Great Britain. While this data is national we know that National Parks, despite their designations, are not bucking these trends. Improvements must be made.

7. Landowners and managers will play a central role in improving and maintaining our treasured landscapes and, as the consultation paper recognises, already have a pivotal role in rural communities. In light of our desire for the National Parks to be enhanced and to deliver even more public benefits, we welcome the proposals to move to a policy of paying public money for the

delivering of public goods, but also recognise the importance of getting this change, and the transition to it, right.

Responses to selected consultation questions

How can we improve the delivery of the current Countryside Stewardship scheme and increase uptake by farmers and land managers to help achieve valuable environmental outcomes?

8. Coverage of agri-environment schemes in the Parks has generally fallen in recent years. In the Peak District National Park, for example, coverage was approximately 87% in March 2014, falling to approximately 78% by March 2015 and 72% by March 2016. Under Countryside Stewardship, it has been estimated that coverage in the Peak District National Park is likely to drop of around 50%.² Although the introduction of the simplified offers, including an uplands one, may go some way to addressing this decline, other issues need to be addressed.

9. As highlighted in the Wildlife and Countryside Link response, improvements in the delivery of Countryside Stewardship are urgently needed. Delays in responding to requests for applications packs, offering agreements and making payments, all need to be addressed if the perception, and reality, of applying to the scheme is to improve. If these issues are addressed, consideration should also be given to increasing the frequency of the application windows if increases in uptake are to be secured.

10. An increase in the availability of advice will also be critical if uptake is to be improved, especially in locations where the delivery of schemes is known to be complex, such as on common land.

What is the best way of applying reductions to Direct Payments? Please select your preferred option from the following:

- a) Apply progressive reductions, with higher percentage reductions applied to amounts in higher payment bands
- b) Apply a cap to the largest payments
- c) Other (please specify)

11. We support the Government's stated commitment to phasing out direct payments and focusing future funding on the delivery of public goods. We recognise, however, the importance of managing this change very carefully. This is especially critical for farms that graze livestock (including mixed farmers) because of their high reliance on direct payments³.

12. In light of the recognition in the consultation document of the vulnerability and importance of farming and land management in the uplands [chapter 8], and the complexity of implementing new schemes on common land, Defra should give particular consideration to supporting transition in those areas.

13. It is difficult to select a preferred option without a detailed understanding of the potential impact of each. While we recognise the consultation identifies the percentage of recipients of direct payments that would be affected by each option, it is unclear whether these are farmers who are most vulnerable in terms of their reliance on public money, or to what extent the businesses affected by the reductions might be able to access some of the freed up funding that will then be

² http://www.peakdistrict.gov.uk/_data/assets/pdf_file/0012/968835/Background-Topic-Papers.pdf

³ Data about Farm Business Income in Defra (2018) [The future farming and environment evidence compendium](#)

delivered through pilot projects. We believe that Defra should undertake more detailed modelling of the potential impact of the proposed options before a final decision is made.

14. Consideration must also need to be given to how to support those farmers and land managers that are due to come to the end of existing agri-environment schemes during the transition period. We welcome the statement in chapter six of the consultation document, that the Government will ‘make sure that no one in an existing scheme is unfairly disadvantaged when we make the transition to new arrangements’ [page 36], but if farmers are coming to the end of agri-environment funding and their direct payments are being reduced during this period it is essential they are supported into a new pilot scheme, or their existing scheme is extended until the new environmental land management scheme is open for applications.

15. Notwithstanding those comments, we are minded to support a progressive reduction of direct payments. If there is to be a finite agricultural transition period, then beginning that transition period with a high proportion of recipients earlier, and then managing that transition more gradually for them, appears to be more appropriate.

16. Within that approach, we would support the setting of a threshold of £25,000 and the idea of different percentage reductions for different payment bands. While we recognise and support Defra’s desire to free up funding to support pilots, the proposal of a 75% reduction for the highest recipients appears too extreme as it would cut substantial amounts of funding from farm businesses, without supporting them towards a new scheme.

17. To support people to transition it will also be essential that there is clarity about the new environmental land management scheme people are able to transition towards. Defra should not begin reducing direct payments without implementing a corresponding increase in funding being available.

What are the factors that should drive the profile for reducing Direct Payments during the ‘agricultural transition’?

18. As set out in paragraphs 11 – 17 above, the reduction of direct payments needs to be handled carefully. While we recognise that not all farmers and land managers are delivering the environment outcomes we want to see on land within the National Parks, we believe that with the right new environmental land management scheme in place they are best placed to deliver improvements on their land. We would not, therefore, support a transition that risks the loss of significant numbers of farmers and land managers due to catastrophic reductions in farm incomes.

19. The profile for reducing direct payments needs, therefore, to be informed by an understanding of the vulnerability of farm businesses and the availability of funding through pilots and the new scheme. We do not believe it will be adequate to only release funding for pilots during the transition period – it is essential that there is clarity on the new scheme and the new scheme begins to be rolled out during the transition period.

20. The reductions in direct payments also need to be accompanied by the availability of business advice, so farmers are supported to make informed decisions about their future during this time.

How long should the ‘agricultural transition’ period be?

21. As illustrated by the delivery challenges of Countryside Stewardship, and Environmental Stewardship before that, it is essential to make sure any new scheme is ready to be rolled out. This will include any new IT systems being thoroughly tested in advance. The achievement of this should be a factor in determining the length of the agricultural transition period.

22. Taking into consideration the commitment in the consultation paper to pay 2019 Basic Payment Scheme in England on the same basis as 2018, we believe the transition period should begin in 2020 and the new environmental land management scheme should be in place and available for all land managers in 2025. This would represent a transition period of five years.

Does existing tenancy law present barriers to new entrants, productivity and investment?

23. We believe new entrants and succession planning could help introduce more innovative approaches to management and support the delivery of more public benefits, as well as high quality food. Many new entrants will be tenant farmers. As *Agricultural Holding Act 1986* tenancies have ended and been replaced by Farm Business Tenancy Agreements, it has given rise to short term tenancies. This impacts on the environmental contribution tenant farmers make as it prevents tenants from being able to plan longer term. We recommend, therefore, that Defra undertakes or commissions a review of Farm Business Tenancies.

Which of the environmental outcomes listed below do you consider to be the most important public goods that government should support?

Please rank your top three options by order of importance:

- a) Improved soil health**
- b) Improved water quality**
- c) Better air quality**
- d) Increased biodiversity**
- e) Climate change mitigation**
- f) Enhanced beauty, heritage and engagement with the natural environment**

24. We strongly support the proposal on page 32 of the consultation document that a new agricultural policy will be underpinned by payment of public money for the provision of public goods. As set out in paragraphs four – seven above, farming and land management have shaped the National Parks, but the intensification of agriculture has also resulted in practices that have been damaging to the environment. The proposed new policy is an opportunity to address these challenges and support sustainable land management.

25. We believe that all of the public goods listed above are important, need improvement and should be supported by government through a new environmental land management scheme. We are not, therefore, prepared to rank them. Instead we believe all of them can and should be achieved through a new policy that seeks to secure multiple benefits.

26. While all of the options listed above are important and should be priorities for the new policy, we believe that different options may need prioritizing in different locations. We support, therefore, a national policy that seeks to secure a range of improvements, but within that framework the ability for schemes to be locally tailored. The National Park Authorities should play a central role for delivering this within the National Parks.

27. Despite being unprepared to rank the options, we would highlight that we are pleased that the need to enhance beauty, heritage and engagement with the environment is included in this list. This is closely related to option e, in the 'other' outcomes list in the following question, but we

would argue that resilient rural communities, traditional farming and landscapes in the uplands are part of enhancing the beauty and heritage of the environment.

28. Natural beauty is the sum of a number of parts of the environment – National Parks are beautiful because of the high quality landscapes they contain, the wildlife, the cultural heritage, their relative wildness and tranquillity. Landscape is also about the relationship between people, place and nature. All of these elements, as well as the ecosystem services these areas provide, are important and we have interpreted option f as recognising this. If beauty is to be a priority, which we believe it should, work needs to be undertaken so we can monitor whether the quality of our landscapes are improving, declining or staying the same. This should be informed by landscape character, but it needs to be more than a description and enable people at the national and local level to understand changes and monitor trends.

Of the other options listed below, which do you consider to be the most important public goods that government should support? Please rank your top three options by order of importance:

- a) World-class animal welfare**
- b) High animal health standards**
- c) Protection of crops, tree, plant and bee health**
- d) Improved productivity and competitiveness**
- e) Preserving rural resilience and traditional farming and landscapes in the uplands**
- f) Public access to the countryside**

Are there any other public goods which you think the government should support?

29. We welcome the acknowledgment in the consultation paper [page 34] of the role farming has played, and continues to play, in shaping England's unique natural landscapes and the recognition that farm businesses and communities face particular challenges. We also agree that areas, such as the uplands deliver many public goods that are worthy of public investment. But, we would highlight that the public goods delivered are those listed in the original environmental outcomes list. Upland and other remote rural areas should, therefore, be seen as core areas in which the desired environmental enhancements and outcomes will be achieved. Where further thought may need to be given is to ensuring a new scheme is successful in these areas. This may include considering levels of financial incentives and rewards, locally tailored options for these areas and high quality advice being available. This will also be the case for common land, where again environmental outcomes should be the focus, but the complexity of securing those outcomes needs to be recognized and addressed in the development of a new policy.

30. We believe that public access to the countryside is an important public good that should be prioritized within a new policy. Public access provides a wide range of important health and well-being benefits, as well as opportunities to better engage people with our natural environment.

31. Although we recognise there is a role for public policy in creating the conditions in which productivity improves, we do not support the inclusion of improved productivity as a public good. This is because the primary beneficiary of improved productivity is the producer.

From the list below, please select which outcomes would be best achieved by incentivising action across a number of farms or other land parcels in a future environmental land management system:

- a) Recreation**
- b) Water quality**
- c) Flood mitigation**
- d) Habitat restoration**

- e) Species recovery
- f) Soil quality
- g) Cultural heritage
- h) Carbon sequestration and greenhouse gas reduction
- i) Air quality
- j) Woodlands and forestry
- k) Other (please specify)

32. Environmental outcomes do not respect farm holding boundaries and so all of the listed outcomes are important and would benefit from action at a landscape scale. We welcome the inclusion of recreation in the list. Landscape quality and character are missing from the list and should also be included.

33. Collaboration to deliver multiple environmental outcomes should be supported and incentivized where possible, but actions on individual holdings will also provide important benefits. This is why a strategic overview of the priorities for environmental outcomes and enhancements for an area is needed. Individual agreements can still support the delivery of those priorities, and collaboration can be both formal, through joint agreements, and informal, through coordinated advice to neighbouring farmers. Within the National Parks the strategic priorities should be developed by the National Park Authorities and they should also play a key role in delivering advice on the ground.

What role should outcome based payments have in a new environmental land management system?

34. A new environmental land management scheme should be focused on outcomes and therefore payments should reflect that. We welcome the recognition of the outcomes-based pilot project in the Yorkshire Dales National Park and the statement in the consultation that ‘the results of the first pilots will inform the design and approach for a new environmental land management system to be introduced in 2022’ [page 41].

35. From visiting the pilot in the Dales, and meeting some of the farmers and advisers involved, we believe this model shifts the relationship between the adviser and the farmer because rather than prescribing actions, it recognizes their expertise and local knowledge. As the consultation document notes, we also believe it will provide better value for money than the current approach.

How can an approach to a new environmental land management system be developed that balances national and local priorities for environmental outcomes?

36. We believe locally tailored priorities and schemes should be an important part of the new environmental land management scheme, but that these should be developed within an agreed national framework, which sets national priorities and the level of ambition. National Character Areas, and the statements of environmental opportunities they include, should be an important part of the evidence base for informing those local priorities.

37. The importance of schemes being locally tailored has been an important lesson from many of the existing schemes being managed. For example, people involved in trying to encourage land managers to take up the Mid-Tier Wild Pollinators and Farm Wildlife Package in Dartmoor highlighted that the package of measures was not well suited to the area, despite it being in a ‘hotspot’ area. The adviser reported that unfortunately, the farmers on Dartmoor that were interested in the package were not eligible to apply for the package because the options for pastoral

farms are largely not applicable as they must be outside of the Severely Disadvantaged Area. Within the essential resources options, this ruled out the options of GS2 and GS1, which leaves only GS4, which was not relevant for permanent pasture, and BE3 which was not enough on its own for an application.

38. As highlighted in chapter five of the consultation document, there are a wide range of public goods that a new environmental land management scheme should be seeking to deliver. These should be set out at the national level. Within that framework the priority outcomes and the changes in management practices needed, if any, to deliver those outcomes should be locally determined. This may mean, for example, that stocking densities are changed in some areas or land is managed less intensively to enable the restoration of natural environmental systems. But this should not be dictated from a national level. It will also better recognise that areas such as the uplands, do not all have the same attributes and that the uplands within the Lake District may benefit from different management approaches from Exmoor, in order for both areas to maximise the public benefits they are able to deliver.

How should farming, land management and rural communities continue to be supported to deliver environmental, social and cultural benefits in the uplands?

39. We welcome the recognition in the consultation paper of the importance of the uplands and with the commitment to explore a vision for the uplands [page 47]. We would highlight that there are many rural communities, including remote farming, that is not within the uplands and that while we focus our comments on the uplands, in response to the question, we encourage Defra to give further consideration to vulnerable and remote communities outside of these areas. It is also important to note, that most common land by area is associated with the uplands of northern and western England, and 37% of land above the moorland line is common⁴. This will also need to be taken into consideration as a vision for the uplands is developed.

40. The upland National Parks are renowned for their beautiful landscapes and over 70 million visits⁵ are made each year to them with visitors contributing significant amounts to the local economies. They also have an important role in food production, in England, 29% of breeding cows are in the uplands and 44% of breeding sheep⁶.

41. The upland Parks are important for biodiversity, heritage and the recreational opportunities they offer. The English uplands contain 53% of our SSSIs⁷ and while land designated as Severely Disadvantaged Areas accounts for 12% of England's land area, it contains almost a third of all scheduled ancient monuments⁸. The uplands also provide vital ecosystem services, including our peatlands that store away 138million tonnes of carbon⁹. But we recognise that the management of the uplands has not always been exemplary and with the right management, underpinned by the right support through a new environmental land management scheme, we believe these areas could deliver far more public benefits.

42. We strongly support the statement that 'many upland areas have the potential to benefit from new environmental land management schemes, given the nature of their landscapes and the

⁴ Foundation for Common Land website <http://www.foundationforcommonland.org.uk/about-commons> (accessed 24/4/18)

⁵ 70million for English upland National Parks based on STEAM data

⁶ Harvey and Scott (2016) *Farm Business Survey 2014/2015: Hill farming in England*

⁷ Natural England (2013) *Natural England: Uplands Strategic Standard*

⁸ English Heritage (2010) *Farming in the Uplands: written evidence submitted by English Heritage*

⁹ Natural England (2010) *England's peatlands: carbon storage and greenhouse gases*

many public goods that they deliver' [page 46]. The new policy is an opportunity to develop a new language about our upland areas. As we leave the Common Agricultural Policy, we also need to leave behind the language of 'Less Favoured' and 'Severely Disadvantaged' areas. The development of this new policy is an opportunity to recognise and reward upland land managers for the full range of environmental, social and cultural benefits that the uplands provide.

43. Farm incomes in the uplands are generally low and heavily reliant on direct payments¹⁰. Operating farm businesses in these areas can be difficult due to a range of challenges, including the limitations of the terrain and distance from markets. In light of their potential to deliver high levels of public benefits, we believe there is a strong argument that the uplands should benefit, financially, more under the new system than they do currently. To achieve this, it will be important to get payments level right. Current agri-environment payments are based on income foregone and costs incurred. If we really are going to move to a system where we are paying for the delivery of public goods we need to be rewarding people for the public goods and the outcomes they are providing. We will need to stop, therefore, focusing on compensating them for the actions they took, or did not take, to deliver them.

44. We recognise membership of the World Trade Organisation comes with obligations. But we understand that value- or results-based payments are possible¹¹. Meaning that the higher the environmental benefits delivered, the higher the payment. Current agri-environment schemes are cost based and are classed as meeting the WTO green box, meaning they are minimally trade and production distorting. A system that is truly based on rewarding the delivery of environmental outcomes that are a public good may well fall into the blue box – meaning the payment is considered trade-distorting but does not encourage production.

45. While we recognise these comments are relevant to the future funding of schemes for all types of farmers, we believe it is critically important for supporting farmers and land managers in the uplands.

There are a number of challenges facing rural communities and businesses. Please rank your top three options by order of importance:

- a) Broadband coverage**
- b) Mobile phone coverage**
- c) Access to finance**
- d) Affordable housing**
- e) Availability of suitable business accommodation**
- f) Access to skilled labour**
- g) Transport connectivity**
- h) Other, please specify**

46. We welcome the recognition within the consultation paper of the range of challenges facing many rural communities, especially those in remote areas. Options will be of different levels of importance in different areas and so we are not prepared to rank them.

47. Rural communities within the National Parks face all of the issues listed, but access to affordable housing is a particular challenge in these areas. This issue is exacerbated by the proportion of homes in many Parks that are owned as second homes or holiday lets. Average house prices in National Parks are

¹⁰ Defra (2018) [The future farming and environment evidence compendium](#)

¹¹ For example <http://capreform.eu/does-the-wto-discipline-really-constrain-the-design-of-cap-payments/> and https://www.researchgate.net/publication/299263202_Paying_for_Environmental_Results_is_WTO_Compliant

significantly higher than the average house price in their respective region. The premium for a property in a National Park in England varies from 27% to 90% but in five of the 10 National Parks it is over 60%.¹².

48. In light of the high number of visitors to the National Parks, transport connectivity is also important. We want to make it easier for people to visit and enjoy the National Parks by more sustainable means and improving public transport, but also the connectivity of different modes of transport, would help achieve this. Improved access would have benefits for the environment, rural businesses, visitors and residents. Further information about this work is set out in our short report, *National Parks for all: making car-free travel easier*¹³.

49. Other issues that could be added to the list are the challenges presented by aging populations and a loss of rural services. Evidence shows that rural communities continue to face a loss in community facilities and public services, including post offices and schools¹⁴. The populations within the Parks are also more elderly than national averages for England and Wales¹⁵ and this presents challenges in terms of the provision of services.

With reference to the way you have ranked your answer to the previous question, what should government do to address the challenges faced by rural communities and businesses post-EU Exit?

50. The important point raised by many of the issues listed is the need for a cross government response to tackling these issues because the majority of them cannot be addressed by Defra alone. We await government's response to the Select Committee on the Natural Environment and Rural Communities Act 2006's report, *Countryside at a crossroads*¹⁶, which included the statement: *"The Commission for Rural Communities performed an important role as an advocate for rural England. Abolition of the Commission has left a number of gaps in the Government's understanding of the needs of rural areas; of particular concern is the loss of the CRC's independent research capacity."*

How far do you agree or disagree with the broad priorities set out in the trade chapter?

51. Producing and selling high quality food will be central to maintaining support for, and confidence in, land managers, farmers and growers. We recognise the uncertainty that our exit from the EU has created for the agriculture sector and the importance, therefore of getting new trade deals in place. We support the statement in the consultation document that 'maintaining and enhancing our high standards of food safety, animal welfare and environmental protection will remain paramount'. This commitment must be reflected in relevant primary legislation.

How far do you agree with the proposed powers of the Agriculture Bill? What other objectives might we need in the Agriculture Bill to achieve our objectives?

52. Notwithstanding our comments throughout this response about the priorities for a new environmental land management scheme, we agree that the proposed powers of the Agriculture Bill are necessary. However, to support farmers and land managers to transition to a new policy there is

¹² Cumulus Consultants Ltd & ICF GHK report for National Parks England (2013) [Valuing England's National Parks](#)

¹³ Campaign for National Parks (2018) [National Parks for all: Making car-free travel easier](#)

¹⁴ National Housing Federation (2017) [Affordable housing saving rural services](#)

¹⁵ Office for National Statistics (2017) [Small area population estimates in England and Wales: mid 2016](#)

¹⁶ <https://publications.parliament.uk/pa/ld201719/ldselect/ldnerc/99/99.pdf>

a need for clarity about what the new regime will look like. The Bill needs to begin to provide that clarity.

53. We believe, therefore, that the scope and ambition of the Bill needs to include:
- A broad purpose, which sets out the parameters for future policies. This must include the commitment to moving towards rewarding farmers and land managers for the delivering of environmental goods.
 - The new regulatory baseline so there is clarity on the minimum standards that will have to be adhered to once cross compliance ends.
 - A requirement on Ministers to develop and adopt targets and milestones related to the environmental outcomes. This will help the public understand what is to be delivered through the new policy and what public money is paying for.
 - Clarity about how the government will be held to account and scrutinised in terms of progress towards delivering environmental enhancement and rewarding the delivery of public goods.

For further information about any aspect of this response, please contact Fiona Howie, chief executive (email: fiona@cnp.org.uk, tel: 020 7981 0895)