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1 What is your name?

Name:

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2 What is your email address?

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3 In what capacity are you responding to this consultation?

Organisation

If responding on behalf of an organisation please specify:

Northern Farmers & Landowners Group

4 We will summarise all responses and place this summary on our website at www.gov.uk/defra. This summary will include a list of organisations that responded but not people's personal names, addresses or other contact details. If you do not want your response - including your name, contact details and any other personal information - to be publicly available, please say so clearly in the box below. Please note, if your computer automatically includes a confidentiality disclaimer, that won't count as a confidentiality request. Please explain why you need to keep details confidential. We will take your reasons into account if someone asks for this information under freedom of information legislation. But, because of the law, we cannot promise that we will always be able to keep those details confidential.

Please explain why you need to keep details confidential:

5 Regional distribution of direct payments: do you support the principle of moving to more equal rates of payment across the three payment regions?

Option 2: Uplift in upland direct payments (with modest reductions to lowland direct payments)

Please comment further if you wish, or explain what other option you favour:

Provides the opportunity for simplification by reducing the number of types of entitlements, while also moving money to the uplands where it is needed most. Such a move will hopefully make up for the reduced CAP budget and probably reduction in agri-env payments, so allowing upland farmers to remain in business.

6 Do you support our preferred option that we should apply the minimum level of reduction possible? If not, what level do you think should be applied?

We should apply the minimum level of reduction possible (5% on receipts over €150,000)

Please comment further if you wish, or explain what other reduction you favour :

Very much so. Capping is not designed with UK farming in mind. The larger land holdings, particularly here in the North East, warrant the minimum level of reduction. Anything more would be a barrier to farm restructuring, innovation, efficiency and business expansion.

7 Do you support our preferred option that we should not implement salary mitigation? Please explain your response.

We should not adopt salary mitigation

Please comment further if you wish:

Absolutely not. It would be very complicated so lets keep it simple. Again it flies in the face of seeking industry efficiencies and would be open to all sorts of abuse.

8 Do you support our preferred option not to implement redistributive payments as an alternative to reductions?

We should not implement redistributive payments

Please comment further if you wish:

It would be a waste of time and energy as it would achieve nothing.

9 Do you support our preferred option not to extend the list of "negative activities" forming part of the active farmer test?

The negative list should not be extended

Please comment further if you wish, or explain what types of businesses should be added to the list and why:

10 We must set a limit on the number of entitlements that can be claimed under the Young Farmers Scheme which must be between 25 and 90. What do you think should be the ceiling that can be claimed by an applicant to this scheme?

A limit of 90 entitlements (the highest limit possible)

Please comment further if you wish, or explain what other limit you favour:

If we have to have such a scheme, then it may as well be given the full opportunity to make a difference.

11 Our preferred option is not to require those seeking to participate in the Young Farmer Scheme to meet additional eligibility criteria. Do you agree?

We should not add additional criteria

Please comment further if you wish, or explain what additional criteria you prefer.:

Keep it simple. Bits of paper dont necessarily make a good farmer.

12 Do you have any other comments you would like to make on the issues addressed in this section on the implementation of Direct Payments?

Do you have any other comments you would like to make on the issues addressed in this section on the implementation of Direct Payments?:

13 The Government is not minded to take up the option to implement greening through a National Certification Scheme containing additional, equivalent measures. Do you agree with this approach or do you see a case for a National Certification Scheme and, if so, on what grounds?

The Government is not minded to take up the option to implement greening through a National Certification Scheme containing additional, equivalent measures. Do you agree with this approach or do you see a case for a National Certification Scheme and, if so, on what grounds?:

Lets keep it as simple as possible and build on the UK success of agri-env schemes.

14 Do you agree that this approach to the implementation of greening in England strikes the right balance between environmental benefit and administrative cost, in the context of our approach to the CAP Reform package as a whole?

Do you agree that this approach to the implementation of greening in England strikes the right balance between environmental benefit and administrative cost, in the context of our approach to the CAP Reform package as a whole?:

Probably the best that can be done with a poor set of EU regulations.

15 Making available the full list of Ecological Focus Areas (EFA) options would mean that much of the EFA requirement could be met without additional action and that various options may have differing environmental benefits. Which selection of EFA options do you favour?

Making available the full list of EFA options would mean that much of the EFA requirement could be met without additional action and that various options may have differing environmental benefits. Which selection of Ecological Focus Area options do you favour?:

It is tempting to say keep them all in order to make it as simple as possible, but it would be nice if the "greening" actually achieved some positive outcomes.

Therefore, I would remove coppice and consider removing fallow depending on detailed rules.

16 There is a particular interest to see benefits for pollinators arising from the implementation of greening. Are there any practical Ecological Focus Area options, or enhancements of these options, which could be easily adopted, have a high likelihood of uptake and which would be particularly beneficial for pollinators? Would these options be deliverable within the approach set out in the direct payments Regulation or would they need to be implemented through a National Certification Scheme?

There is a particular interest to see benefits for pollinators arising from the implementation of greening. Are there any practical Ecological Focus Area options, or enhancements of these options, which could be easily adopted, have a high likelihood of uptake and which would be particularly beneficial

for pollinators?:

Hard to comment with no details of what the options involve, but it does seem possible to create such benefits in green cover and buffer strips.

17 Cross compliance standards of Good Agricultural and Environmental Condition (GAEC) under the new CAP aim to protect soils, water and maintain the landscape.

Are there any current GAECs that you think should not be carried forward and included from 2015? If so, what are your reasons and evidence for this?:

18 Are there elements within any GAEC that you think should or could be changed, implemented better, or excluded? If so why?

Are there elements within any GAEC that you think should or could be changed, implemented better, or excluded? If so why?:

19 What lessons can be learned from the current Rural Development Programme? How can we build upon its successes?

What lessons can be learned from the current Rural Development Programme?:

Too much complexity. Appalling administrative structures and delays (ie LEADER, REG), hard to keep track of with schemes coming and going. Short application windows can be tricky for applicants and create administrative log jams.

However, plenty of good stuff funded under it as well. If REG was quick it could make a difference. Small business funding always useful.

20 Are there any key areas we have missed in our assessment of need to support the new Rural Development Programme?

Are there any key areas we have missed in our assessment of need to support the new Rural Development Programme?:

No.

21 Are there any further sources of evidence of social, economic and environmental need in rural areas for England that have not been captured?

Are there any further sources of evidence of social, economic and environmental need in rural areas for England that have not been captured?:

No

22 Are the areas we outline for support under the new Rural Development Programme the right ones?

Are the areas we outline for support under the new Rural Development Programme set out above the right ones? :

Yes

23 How we can best target investment under the new Rural Development Programme to help gain the maximum value for money for UK taxpayers?

How we can best target investment under the new Rural Development Programme to help gain the maximum value for money for UK taxpayers? :

Streamline the admin.

Agri-env schemes provide plain value for society. Rural economy growth funding is clearly beneficial, particularly where local multiplier effect is captured.

24 How might we make the process for applying for Rural Development funding simpler or less bureaucratic?

How might we make the process for applying for Rural Development funding simpler or less bureaucratic?:

Why are you asking me? Only you know why it takes nearly a year to approve a REG application, or why LEADER needs 4 layers of admin. I would guess that it is something to do with meeting EU criteria, but the effects of these must be minimised and risks should be taken. The application process is often off putting for real businesses, and the time delays mean that the schemes become more of a hindrance than a help.

25 How might this be balanced against the need to ensure clear accountability for public funds?

How might this be balanced against the need to ensure clear accountability for public funds?:

Ministers need to be brave enough to accept that obtaining real value from public funds involves taking risks, just as the private sector does with its own money. Removing the risks invariably take time and negate the effect of the funds. Just look at past actions by RDAs for numerous examples of well evidenced but totally ineffectual spending.

26 What role could loans or other financial instruments play in delivering the Rural Development Programme?

What role could loans or other financial instruments play in delivering the Rural Development Programme:

None. If banks wont support a project, why should public funds unless there is a clear need for seedcorn loan funding in new business areas(ie as has happened in AD).

27 What are your views on the structure of the proposed new environmental land management scheme, in particular the new “landscape scale” approach?

What are your views on the structure of the proposed new environmental land management scheme, in particular the new “mid- tier” approach? :
Sounds good but will it do more harm than good? There is a risk that really good individual sites miss out on funding due to the desire for a "landscape scale" approach. The scheme should be delivered for environmental outputs rather than just taking a prescriptive approach.

28 Do you agree that we should not be prescriptive about how groups of farmers or land managers could be brought together to deliver landscape scale agreements under the proposed new environmental land management scheme?

Do you agree that we should not be prescriptive about how groups of farmers or land managers could be brought together to deliver landscape scale agreements under the proposed new environmental land management scheme? :

Very much so. Any success will depend on circumstances in an area and a prescriptive approach would not be helpful.

29 How could we help facilitate landscape-scale approaches under the proposed new environmental land management scheme?

How could we help facilitate landscape-scale approaches under the proposed new environmental land management scheme?:

Use existing infrastructures ie National parks, large estates, AONBs, HLF areas, commoners associations, Heritage sites etc etc.

Surely Natural England is capable of putting a few together outside those areas?

30 Should we offer a capital only grant as part of the proposed new environmental land management scheme?

Should we offer a capital only grant as part of the proposed new environmental land management scheme?:

Yes. That would be very helpful indeed. I like the concept of it being easy with low admin costs. The costs attached to past capital grants under HLS were way beyond a joke.

31 Do you agree with the principle that five year agreements should be the norm under the new environmental land management scheme?

Do you agree with the principle that five year agreements should be the norm under the new environmental land management scheme? :

Is this to fit with the CAP regime? A longer period would be more likely to deliver the required outcomes.

32 What approach should we take to targeting the new environmental land management scheme?

What approach should we take to targeting the new environmental land management scheme?:

There must be a focus on continuation of existing schemes otherwise the past investment could well be wasted. Will there be much over and above this activity? Should not be too hard to spend.

33 With the exception of the highest priority sites, is there a case for making advice and guidance available increasingly on line or through third parties under the new environmental land management scheme?

With the exception of the highest priority sites, is there a case for making advice and guidance available increasingly on line or through third parties under the new environmental land management scheme?:

I struggle to see the benefit of on-line advice. While it may address some technical issues of admin, I suspect that most of the advice required is on-site practical advice. With the demise of FWAG, there are plenty of self employed consultants who could supply this advice on a low cost basis.

More important, is how the scheme is to be administered and who by? We currently have conflict between RPA, Natural England and farmers. NE set the scheme up, RPA administer it with no practical knowledge, the farmer gets shafted. Hardly ideal.

34 Where should we set the scheme entry requirements (i.e. above the legal baseline) for the proposed new environmental land management scheme?

Where should we set the scheme entry requirements (i.e. above the legal baseline) for the proposed new environmental land management scheme?:

Surely this depends on the money that is available via the scheme. Will it be "broad and shallow" or "narrow and deep"? The indication is that it will be HLS Lite, so the entry point needs to be set accordingly.

35 Have we identified the right areas of support under the new Rural Development Programme to help improve the competitiveness and efficiency of the farming, forestry and other land-based sectors? Are there any other areas which could be supported?

Have we identified the right areas of support under the new Rural Development Programme to help improve the competitiveness and efficiency of the farming, forestry and other land-based sectors? Are there any other areas which could be supported?:

Yes

36 What activities to support the farming, forestry and other land-based sectors under the new Rural Development Programme would provide the best value for money for the UK taxpayer?

What activities to support the farming, forestry and other land-based sectors under the new Rural Development Programme would provide the best value for money for the UK taxpayer?:

Those designed to create demand in the local supply chain and achieve the multiplier effect in the local economy. Schemes that do little more than fund imported plant and machinery are of little value to the local economy.

37 How should we support advice and skills for the farming, forestry and land-based sectors under the new Rural Development Programme?

How should we support advice and skills for the farming, forestry and land-based sectors under the new Rural Development Programme?:

Monitor farms - build on the success of the last programme.

Sector skills programme. What happened to Lantra? Sadly the capacity created in the last programme has now been lost.

38 How can we ensure any advice provided to the farming, forestry and other land based sectors and through the new environmental land management scheme is integrated and linked with advice provided within the industry in the light of the Review of Advice and Partnership Approaches?

How can we ensure any advice provided to the farming, forestry and other land based sectors and through the new environmental land management scheme is integrated and linked with advice provided within the industry in the light of the Review of Advice and Partnership Approaches?:

39 How do we ensure innovation is considered across the breadth of the new Rural Development Programme?

How do we ensure innovation is considered across the breadth of the new Rural Development Programme? :

Innovation - easier to say than create! Most Gov schemes are designed to stifle innovation due to their very nature. Is the R&D infrastructure still sufficiently robust to introduce innovation to practical reality? Schemes should support innovation even if it may not work.

40 How could we develop proposals for an England specific European Innovation Partnership to support this?

How could we develop proposals for an England specific European Innovation Partnership to support this?:

This sounds just the sort of thing that would kill innovation stone dead.

41 How can we strengthen LEADER's contribution to delivering jobs and growth in rural areas?

How can we strengthen LEADER's contribution to delivering jobs and growth in rural areas? :

Ensure that LAGs address the current priorities rather than continue to pursue outdated, social priorities. In some cases this may well require a purge of existing LAGs if they cant produce a strategy to meet the current objectives and then deliver to that strategy.

42 How can we make the LEADER approach more effective and deliver better value for money?

How can we make the LEADER approach more effective and deliver better value for money?:

See above.

Address the multi-layered admin issue. A real burden and cost for all involved, which encourages third sector participation and discourages private sector engagement.

43 Without a transfer there would be no new investment in rural development over the next 7 years. Transferring funding to Pillar 2 would allow us to deliver improvements in the natural environment, productivity and longer term competitiveness of UK agriculture and help us to grow the rural economy in England.

Yes

15%

If less, what level would you prefer?:

What would you not want to see funded :

Please Specify:

I am not thrilled by the suggested removal of 15% of farmers' BPS payment, but there seems to be little alternative if Pillar 2 is to deliver anything of any value.

44 RDP funding can improve the rural environment, improve the competitiveness of the farming sector and productivity of the forestry sector, support growth in the rural economy, and strengthen rural communities.

What priorities should we spend RDP funding on? :

Environment - Agri-environment and forestry:

81

Farming competitiveness and forestry productivity :

5

Growth Programme:

9

LEADER:

5

Please explain your reasoning:

Reflects the current distribution and funding of agri-env.

I have little confidence in Leader delivering growth so it should get the minimum.

45 Do you agree that we should not introduce a requirement for written contracts between producers and processors/distributors at this stage?

Do you agree that we should not introduce a requirement for written contracts between producers and processors/distributors at this stage?:

Yes. keep it simple and dont interfere with private commercial arrangements.

46 Do you agree that we should not make it possible for producer organisations and inter-branch organisations to be formally recognised in additional sectors of agriculture?

Do you agree that we should not make it possible for producer organisations and inter-branch organisations to be formally recognised in additional sectors of agriculture?:

Yes - leave the freedom of co-operatives.

47 Do you have any comments on this approach or any of these assumptions?

Do you have any comments on this approach or any of these assumptions?: