

## Environmental Land Management

### Testing and Trials

This proposal to develop and test a commons-proofing tool is submitted by the Federation of Cumbria Commoners and backed by the following organisations: Bodmin Moor Commons Council; Brendon Commons Council; Dartmoor Commoners Council; Foundation for Common Land; National Sheep Association; Tenant Farmers Association; The Farmer Network; The Federation of Yorkshire Commoners and Moorland Graziers, The Herdwick Sheep Breeders Association; Will Cockbain, Chairman Swaledale Sheep Breeders Association. If this proposal is successful we will work together with these organisations to develop and test a tool that can cover the diversity of actively grazed commons in England.

The Federation of Cumbria Commoners is a hill farmer owned and managed membership organisation and represents around 500 hill farmers who graze common land (commoners) as part of their overall farm business. The majority of our members have many years practical experience delivering agri-environment schemes and have a good idea of what does and doesn't work on commons. This is equally true for the other organisations supporting this proposal.

### Proposal/idea

**1. Please describe your proposal/idea(s) and its key objective(s) [max 300 words]**  
**In answering this please consider:**

- How does your proposal/idea link in with the 25 year environment plan objectives?
- Is there any evidence and/or past experience to support this proposal?
- Have other options or approaches been considered or tried?

Our proposal is to contribute to the development of a commons-proofing tool to assess and take into account the impact of proposed new environmental land management schemes (NELMS) on commoning, the agricultural management of common land and hill farm businesses in the Lake District, Cumbria and other hill areas of England.

Our overall aim is for increased understanding among scheme designers of the impacts of NELMS design on commoning and how this affects traditional hill livestock (cattle, sheep and ponies) farming systems and hill farm businesses.

Our objective is to develop and test a commons-proofing process that scrutinises NELMS design and delivery to enhance rather than undermine traditional hill livestock farming practices.

A key component of past agri-environment schemes has been to ask for reductions in stocking levels on commons causing changes to traditional hill livestock farming practices that make the management of common land increasingly time consuming. The number of full time commoners has declined and is reaching a critical threshold below which collaborative management and the hefting of stock continues to break down.

If we wish to retain commoning and other traditional hill farming practices, then NELMS design needs to be sympathetic to, and work with, these land management practices. If not, the potential to deliver a number of the 25 YEP objectives in the uplands is compromised as 37% of all land above the moorland line is common land.

## Proposals/Ideas for testing and trials

A commons proofing tool to support NELMS design will enable increased effectiveness, efficiency and value for money of public expenditure to commoners (nearly 4000) It will reduce the need to sort out mistakes at a later date, which is expensive and time consuming.

(Q3 describes in more detail how commoning helps deliver a number of the 25 YEP objectives).

We have a depth of practical knowledge and experience of delivering agri-environment schemes and can draw on what has and hasn't worked under ESA's, the previous Countryside Stewardship scheme, UELS and HLS. In 2003 the Federation produced a Guide of Good Practice for agri-environment schemes (sent as an attachment). Also see [Commons Toolkit Guidance Note 10: Agri-environment schemes on common land](#)

### **2. Please describe what innovation your proposal/idea(s) bring(s) to the new Environmental Land Management system? [max 250 words]**

In answering this please consider:

- Have you drawn on expertise inside and outside of your organisation?
- Have other options or approaches been considered or tried?
- What is the balance between cost and benefit/quality derived from this proposal/idea?
- Why is this proposal/idea suitable for a test and/or trial?
- What would happen if we didn't test and/or trial the proposal/ideas?

Proofing is a well know mechanism by which policies are assessed for their likely impact on a particular area, population or sector. As far as we are aware past agri-environment schemes have not been proofed for their impact on commoning.

Commons proofing is about finding the best ways that commoners can collectively deliver NELMS using traditional hill livestock farming systems. This could mean that implementation might need to be designed and delivered differently in different areas of England.

The elements of commons proofing can be tested via commoners' associations, commons councils and breed societies throughout England with the support of national organisations including the Foundation for Common Land, National Sheep Association and the Tenant Farmers Association.

Examples of potential elements of NELMS for commons proofing for testing/trial:

- Does the facilitation fund employ facilitators with credible knowledge of hill livestock farming/ commoning?
- Does it provide clear guidance on good governance and check that the delivery entities are fit for purpose, transparent and accountable
- Does it provide funding for set-up and ongoing governance costs for collective landscape-scale schemes for the duration of the scheme? Are these funds sufficient?
- Are there locally agreed minimum stocking rates on commons to maintain hefting practices and associated shepherding skills and knowledge?
- Is the scheme design sufficiently flexible to work with local custom and practice?
- Are rules of good commoning practice embedded in the scheme delivery?
- Have cultural heritage practices been locally identified and agreed? Are they integrated in to scheme delivery? How will they be valued, measured and monitored?
- Does the scheme recognise, value and incentivise collaborative working and good neighbourliness through offering a cooperative bonus?
- If moving to results based payments, is this introduced gradually? Are the results realistic, locally agreed with and payments rates sufficient to maintain commoning?
- Does the scheme ask for a majority to sign-up to the scheme and not allow an individual/small minority hold up the scheme

## Proposals/Ideas for testing and trials

Commons proofing is a low cost option to assess the impact of NELMS on commoning. It is a means to improve scheme design and delivery.

### 3. How does your proposal/idea(s) link in with the 25 year environment plan objectives? [max 200 words]

In answering this please consider:

- What specific outcomes will you be targeting / will potentially be impacted? What aspects of your proposal/idea have been informed by the 25 year environment plan?
- What land management practices do you plan to use to deliver these outcomes?
- Have you considered/factored in any potential social/public benefits, as well as the natural benefits within your proposal/idea(s)?

Well-designed NELMS that supports commoning can make significant contributions to the delivery of the following 25 YEP objectives:

- Enhancing beauty, heritage and engagement with the natural environment: 39% of all common land is open access, 82% of commons are in National Parks and AONBs. A key reason for the Lake District gaining World Heritage Status is the continuity of hill farming and commoning in a spectacular mountain landscape.
- Thriving plants and wildlife: 21% of all SSSIs are on common land. Much of the biological interest of common land is dependent commoners continuing to exercise their rights to graze livestock at appropriate levels
- Mitigating and adapting to climate change: around 200,000 ha of England's peat soils are located on upland commons. These store millions of tons of carbon and play a significant role in mitigating global warming. The role of commoners is critical to schemes that restore and protect the peat through agreed management plans and restoring complete vegetation cover.
- Clean and plentiful water: common land plays a crucial role in the supply of drinking water and commoners are increasingly involved in catchment management contributing to quality management at sources and reduced flooding

Commoners' collective stewardship of common land, often spanning centuries has helped to create and conserve nationally important landscape, wildlife and archaeological interest, whilst open for public access. Commons provide public benefits out of all proportion to their area (3% of England). Commoners are a mainstay of the social and economic fabric of many remote rural communities.

### 4. What are the specific risks with the proposal/idea(s) and what are your plans to control or mitigate against these? [Max 250 words].

In our view, the main risk is **not** to develop a process to commons proof NELMS. Other risks include:

- Insufficient capacity to meet delivery expectations. This is mitigated by gaining the support of a good number of organisations that work on common land to ensure sufficient capacity to deliver the work
- Inadequate funding to develop and test the tool. It is unclear if, and what level of funding, is available from Defra. This proposal works for the benefit of commoners and we believe that many may be willing to collaborate on a mostly voluntary basis

Sufficient governance to test and trial the tool. We have good working relationships/levels of communication with the supporting organisations and will be able to develop a light touch protocol for collaboration

Proposals/Ideas for testing and trials

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