



Mr Rhodri Glyn Thomas AM  
Chairman  
Rural Development sub-Committee

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Your Ref:  
Our Ref:

8<sup>th</sup> February 2010

Dear Mr Glyn Thomas

### Inquiry into Glastir

Thank you for this opportunity to respond to your invitation concerning the proposed agri-environmental scheme for Wales - Glastir. I hope you find the comments provided by National Park staff worthwhile.

May I add that the following paper should be read alongside our response to the original Welsh Assembly Government consultation produced on behalf of the Association in December 2008 (Annex 1).

In our paper we have attempted to draw attention to those comments to the consultation that we still regard as valid, such as landscape quality - that we believe Glastir has to address. We have also responded to the points you raised in your original letter and provide an additional commentary regarding several other issues of note.

Opportunities such as Glastir rarely come around and we are keen to maximise its potential within Wales' National Parks. To this end in our paper we conclude that National Park Authorities (NPAs) are best placed to deliver the HLS and we are working with WAG to promote this position.

Yours sincerely,

**Greg Pycroft**  
Welsh Policy Officer

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## Comments on the Glastir Agri-Environmental Scheme

Given our statutory responsibilities for the three National Parks of Wales, and the WAG requirement within its policy statement for National Parks and National Park Authorities<sup>i</sup> we have kept in continual contact with developments concerning the proposals for Glastir and offer these comments.

In December 2008 the National Park Authorities collectively responded, to the WAG "review of land management actions under Axis 2 of the RDP" (Annex 1). At the time we welcomed the review of the strategic considerations, which we saw as an opportunity to "realign" activity with emerging management priorities.

In its policy statement for National Parks and National Park Authorities<sup>ii</sup> WAG recognised that the protected landscapes positively contribute to the Welsh economy and have significant potential to enrich the lives of the people living within them. It is in the interest of everyone to promote sustainable rural development and the subsequent interaction with the landscape. Along with food production, rural communities manage vital ecosystem services such as soils and water. However a "critical mass" is required to provide for the basic management of these services and remains vitally important for National Parks to remain internationally recognised as *category 5* protected areas (IUCN protected management category).

One specific issue we had with the initial review that continues to this day concerns the failure of the scheme to refer to landscape designations. For the reasons we make above we remain strongly convinced that the statutory landscape designations are relevant to Glastir and should be incorporated. Both manage the interrelationship between people and their environment, and National Parks are well suited to develop and test potentially new approaches to the rural economy.

### The Stakeholders Group

On reflection the stakeholder group has not been effective in communicating and gaining consensus. It is our opinion that the frustration of certain stakeholders concerning the evolution of Glastir arises from the engagement mechanism adopted by WAG. We understand this will soon be reviewed, which we welcome.

### Response to Points raised by the sub-Committee Chairman Accessibility to the Programme

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The initial pilot work gave cause for concern. However, we now understand that the results of the initial field trials have been analysed. We look forward to being able to consider the revised criteria for accessibility.

## 20% LFA Payment

We accept that the profitability of upland systems is lower and the opportunities for re-investment are less. If there are concerns regarding the justification of the 20% we would argue for it to be made available as capital assistance rather than revenue for the recipient. Such capital could be targeted on landscape, access, conservation or animal welfare. This would provide better returns for the investment in socio-economic and land management terms.

## 2 Tier System:

We support the proposal provided that designated landscapes feature as a targeted element of the second tier.

## Time Table for Implementation

A time table has been set out; however we wish to express our concern that WAG are working to a schedule that puts at risk the holistic approach originally planned. Failure to address this concern could result in suspicion and frustration amongst stakeholders.

## Targeting Capital Grants at 3 sections

We are concerned at the lack of specialist help and its provision on a first come, first served basis. This could lead to the loss of focus, or marked improvements that could be made.

Another concern relates to the species targeted funding. We fear it will be delivered in a non-holistic way, that fails to consider the wider picture. Should unsuitable work be undertaken it increases the risk of impacting on other species, the landscape, etc.

## Additional Comments

### Targeting

We understand from WAG Officers that key Biodiversity Action Plan habitats and species will be targeted in Glastir with the aid of a biodiversity target map for Wales. This map has been developed by overlaying habitat and species data from a variety of sources and will be used in the point scoring system. This is a welcome development but care needs to be taken that those areas that are currently ecologically poor, but have great potential to be ecologically rich (eg the intensively managed dairy farms of the lowlands) are not excluded by using this methodology. Perhaps consideration could be given to allocating points for the ecological potential of grasslands in particular for ecological reversion (and for the conservation soil carbon - more on this later).

In our preamble above we touched upon the fact that Glastir as it is currently constituted fails to refer to landscape designations. Consideration should be given to targeting landscape improvements, and we will continue to promote the merits of this approach

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## Connectivity

There are a number of prescriptions to encourage improved connectivity in the countryside and this is welcomed. However the majority of these measures are understandably focusing on hedgerows, field banks and stream corridors. More attention needs to be given to other elements. Again grasslands are a good example. A strategic overview that recognises that an area of rough grassland between 2 areas of woodland, scrub, heathland etc, can actually be a far more ecologically relevant "corridor" or connection between habitats is required. This approach needs to recognise the differences in landscape ecology for different types of species (eg different requirements of bats, and indeed different species of bat, bird species, small mammals etc).

If it proves too difficult to build requirements such as this into the system, then Glastir Officers must be encouraged to draw on the local expertise when formulating the HLS farm plans. In particular the NPAs and the Local Record Centres could help with this. In Pembrokeshire work is undertaken with the LRC to produce properly modelled connectivity maps based on local species and habitat data. These maps will be far more sensitive than the national maps being adopted for Glastir.

## Monitoring

This is absolutely critical. Tir Gofal the successes of Tir Gofal have been undermined by the lack of outcome monitoring. We are simply unaware of the environmental and ecological outcomes of the scheme. The prescriptions for Glastir must be outcome focused and require monitoring.

## Carbon Management

i) Carbon stores in upland peats, lowland fens and mires and permanent grasslands must be protected. An important factor determining sinks and sources is the high soil organic content of Welsh soils, mainly associated with permanent grassland and the uplands. The Welsh soil carbon stock is estimated to be 409 Mt carbon or 1499 Mt CO<sub>2</sub>. I understand that WAG have developed a map of peaty soils to indicate the most important areas for stored carbon. This is very welcome. However prescriptions to conserve these habitats and the carbon locked in the soils must be proactive and sufficiently attractive for them to be implemented. We can't afford to risk inappropriate management or neglect on these areas, they are absolutely critical.

Data from 2007 shows that land managed as permanent grassland provides a net carbon sink of -640 ktCO<sub>2</sub> in Wales (WAG Land Use Climate Change Group report). However this figure is offset by emissions produced by nitrogen production and application on the land, as well as emissions from ruminants. Options for low input grassland management in Glastir should be sufficiently attractive to encourage widespread uptake by land owners.

ii) Renewable energy on farms - WAG needs to assess how influential Glastir can be in this

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highly important area. A major recommendation of the LUGCCG is for a huge increase in the number of anaerobic digestion units on dairy farms. WAG need to consider how relevant this is for Glastir.

## Delivery

Delivery needs to take account of, and adequately support, local conservation land management priorities. Project Officers will have to work closely with the NPAs to identify key areas for attention as well as ensuring that there are practical management options (eg ensuring suitable livestock are available for grazing management - using and supporting the Local Grazing Networks). NPAs have the responsibility for planning and implementing landscape scale conservation management on behalf of the WAGs Environment Strategy, and the biggest tool at their disposal for implementation will be Glastir, which is run by WAG. The potential for inefficiencies and duplication of work to creep-in must be avoided.

## Conclusion

Glastir provides a rare opportunity to significantly address future environmental challenges and improve the overall quality of Wales' National Parks through improvements to farming practices and the targeting of resources. To ensure that this is undertaken in the most effective way possible that takes into account Wales' regional differences requires an appropriate delivery mechanism. NPAs possess a wide range of knowledge and experience related to their National Park and in the case of Snowdonia NPA, experience delivering Rhaglen Tir Eryri. For the reasons touched upon throughout this paper we believe that, as far as the National Parks of Wales are concerned, the National Park Authorities are well positioned to deliver the HLS, leaving the basic ELS to be delivered through a better placed national mechanism. In England, an approach that emphasises the deliver potential of National Park Authorities is being developed. The new National Park circular<sup>iii</sup> states that "NPAs have an important role in the...delivery of agri-environment schemes...". DEFRA recognises role of NPAs in future agri-environment schemes, we hope to convince WAG that a similar, partnership approach is a suitable model in Wales.

## Contributors

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<sup>i</sup> Policy Statement for the National Parks and National Park Authorities in Wales. March 2007. WAG. pg.9

<sup>ii</sup> Policy Statement for the National Parks and National Park Authorities in Wales. March 2007. WAG. pg.3

<sup>iii</sup> Consultation on the English National Parks and the Broads: draft Circular – revised version combining Circular 12/96 and Circular 125/77 *Vision for National Parks: Government priorities*. November 2009. defra. pg. 20 point. 84

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