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The Prime Minister
10 Downing Street
London SW1A 2AB

16th November 2020

Dear Mr Johnson,

The Future of England's Common Land

I am writing to ask you to intervene and address the impending car crash emerging from Defra policy – the widespread decimation of the family farm in the uplands and on commons. The forthcoming Agricultural Transition Plan sadly provides me with no reassurance this risk is being addressed.

The Foundation for Common Land is a charity whose public benefit purposes are to improve the natural and cultural heritage of Common Land. As you will know from the time you spend on Exmoor these landscapes are some of England's most loved and precious places. Common Land is seven times more likely to be designated for nature than enclosed land.

I spent a very happy time at your father's place many years ago with Leo as we were preparing for our MSc exams. There is nothing better after a vigorous game of ping pong in the barn to then stride out onto the moors. But these moors aren't self-maintaining; the rural communities who look after them cannot not live on thin air and in the uplands 30% of all businesses are farming and forestry based.

The Secretary of State has repeatedly told myself and Parliament over the last three years that upland farmers and commoners would be well placed to benefit from the shift to public payments for public benefits but this is fast appearing not to be the case. Unless the 14,000 farm businesses looking after England's uplands and commons thrive it is highly likely we will not achieve the fantastic and urgent environmental ambitions set out by your Government. This is despite the best intentions of your hard working officials; good intentions sadly aren't sufficient to guarantee the right results.

The Foundation for Common Land has two primary concerns. Firstly, the decision of Defra to adopt an income foregone plus costs approach to

environmental payments pegs future farm income to the current unprofitable returns from livestock farming. This not only keeps poor people poor but also acts as a massive barrier to change, whether to nature friendly farming, wood pasture, or even beavers. Secondly, Defra is racing ahead with detailed scheme development without modelling farm business response to the complex moving parts of transition from BPS to ELM and the interaction with food production systems. This is likely to lead to a scheme that fails to engage the very businesses we so need to respond; farmers will “go farming” rather than engage with schemes that bring risk and little benefit to their businesses.

We predict the result of the present trajectory on our marginal uplands and commons will be both large scale farm business failure and accelerating environmental degradation. What a home goal when we have a once in a generation chance to transform England’s farming and land use.

Our request is that as a matter of urgency government economists model the impact on uplands and common land businesses of the transition from BPS to ELM and the impact of the current ELM proposals. How many upland farms will go bankrupt before the ELM is available to all? What take up of ELM is expected and what will farm incomes look like under ELM. These findings should be made available to wider stakeholders, ideally the public.

As part of this analysis Defra could test how to turn around the situation with new approaches to setting payment rates and integrating these with other financing mechanisms. The aim should be to properly reward marginal businesses for providing massive societal benefits from securing and enhancing our natural capital while also providing value to the public purse.

I look forward to your response.

Yours sincerely,



Julia Aglionby PhD

Executive Director, Foundation for Common Land

cc

The Rt Hon George Eustice; Secretary of State for the Department for Environment, Food and Rural Affairs

The Rt Hon Rishi Sunak; Chancellor of the Exchequer