I was able to discuss the Land Use Discussion Document with a number of other leading commercial farmers on October 23<sup>rd</sup> so this brief response is a broader commercial response then simply a personal one and hopefully therefore more valuable.

Vicki and Alan have identified many of the issues that are pertinent to a land use strategy and their emphasis reflects correctly present DEFRA strategic priorities. However, as farmers find the existing DEFRA strategy unhelpful and illogical, we do have concerns about elements of the document. It is relatively easy to identify the issues that are relevant but more difficult to decide which of these issues will be critical and which will not – how do we rank them in terms of importance? For example when it came to the question of land manager motivation, it was correctly identified that profitability alone is not the only motive force but for the vast majority of farmers earning an income to live on is the driving force; the other "drivers" such as one's surroundings, fresh air, non commutes etc. are the bonuses that encourage us to justify to ourselves low incomes or low return on capital invested. A land use strategy which does not consider farmer profitability to be critically important will in time either fail or require delivery from others outside the farming community.

This neatly brings us onto the next point. Who will be the main deliverers of a future land use strategy? In the past it has been primarily land owners and although there are now many others who either have a right or believe they have a right to determine how land is used, will it not continue to be land owners or their tenants that will deliver that use in practical terms. We sense that some people find this frustrating and would wish to see more land nationalised with the land use role separated in some way from the farming role. Understandably this would not be popular with existing commercial farmers and we would argue is unlikely to deliver positive results and if it was possible, the delivery is likely to be much more expensive. Much environmental enhancement has been carried out in the past and will be in the future by farmers with the cost being absorbed by them.

If we are correct that profitability is the primary "driver," whilst the majority of land remains in private ownership, it would seem important that those responsible for the delivery of a land use strategy at field level are commercially successful. We have therefore a conundrum. DEFRA and many environmental NGO's are prioritising ecosystem wellbeing and biodiversity as the primary strategic requirements but seem content to see the people delivering that strategy decline. (DEFRA's own figures clearly indicate the reduction in self sufficiency since 1995 and although they now talk about food security, we see no evidence that in practice they equate food security with UK self sufficiency). Keeping food prices low undoubtedly suits the Treasury agenda but the present decline in our self sufficiency, which directly relates to low

farmer profitability, will in due course lead to higher food prices and a requirement to deliver environmental policy through different and probably more expensive and less efficient delivery channels. Witness what is already occurring in the UK uplands. A land use strategy which does not have a balance between commercial profitability, environmental well being and desirable social outcomes will not in the medium and long term effectively deliver any of the desired outcomes.

At this point in time there is a schism between DEFRA and those of us who manage land. Farmers feel that DEFRA and the Treasury remain content to see self sufficiency decline and that environmental considerations so dominate policy that strategic decisions on for example Research and Development, TB in livestock and potential cost sharing on animal diseases are taken in the knowledge that these decisions will make UK land managers less competitive. Of course the DEFRA view is that, in food security terms, we shall be able to access food from our EU neighbours or from further afield and as such our decline in the UK is unimportant. That presumes that in the future those EU neighbours, who themselves are not self sufficient, will want to sell their produce to the UK and that in purchasing terms we shall remain competitive in an ever more demanding global market. It also ignores the fact that with our maritime climate we are well positioned to produce food. We should logically be maximising our production potential here.

In the document the question of extensive as opposed to intensive production was raised. It was manifestly clear from my time on the Curry Commission that non farming policy formers are attracted by the idea of extensive production even though usually there is a significant on cost ensuing in terms of cost of unit of production. The counter argument of course is that intensive production reduces biodiversity and damages ecosystems which is costly in its own right. There is a practical way through this, a "middle ground", which is capable of competitive production and maintenance of biodiversity and that is an integrated farming approach, combining safe modern science and traditional tried and tested practices such as a balanced rotation and organic matter recycling. Biotechnology, subject to rigorous testing, has much to offer the integrated approach.

There is an important role for RELU here, an impartial assessment, based on statistically sound science of the claims, generally unsubstantiated, made by a range of organisations about unsustainable land practices. As farmers we accept that damage was done to biodiversity in the 1960s, 70s and 80s but would argue that generally now biodiversity and farm ecosystems are much improved and that intelligent refinements to existing environmental schemes could further that improvement. We need to be balanced in terms of land use strategy in relation to productive capacity and biodiversity enhancement. The reality is that for arable and vegetable production, to maximise production we should remove all hedges, trees and

grass margins; we do not do so because we recognise that biodiversity is desirable, that ecosystems need some protection and because we enjoy a more diverse environment ourselves. There is a cost to habitat establishment and maintenance as well as income forgone due to lower crop production potential and this is only in part recovered through environmental scheme payments, particularly in the UK with its higher percentage of modulation. As vegetable growers, there are further costs because the more habitat we establish, the more predation we suffer on our crops through pigeons, hares, rabbits, rats and mice. We now use electric fencing to establish almost all our vegetable brassica crops and employ people to shoot pigeons daily for three months of the year.

The more extensive a production system is the less commercially competitive it will be; similarly the more regulated an industry is the less competitive it will be. If in a global context we become uncompetitive we shall either decline or require more support. Support invariably distorts markets and will engender significant cost in the medium and long term. Wherever possible the most efficient production system will result from a market working freely. Clearly again there is a balance here which in a democracy will be determined by constituents through parliament. The priority that our policy makers should give to land use is firstly sustainable productive soils, followed closely by water conservation and maintenance of beneficial insect populations. The population variations of macro organisms such as birds should come relatively low on the priority list. Please be careful if recommending 'target intervention" that you do not forget why historically production has taken place in certain areas. Generally it has been because the basics of soil, water and climate suit production in the relevant areas. There is an inherent danger behind the push for more local production; it will often be less efficient in economic and carbon terms and therefore any advantage gained will be lost and probably will become a net negative.

It would appear incomprehensible that we might consider reducing protection to the UK's most productive soils.

Finally in relation to stakeholder input on land use policy, there is a potential problem. Of course in theory it appears sensible to have a broad range of stakeholder input, but if those stakeholders have limited knowledge of practical reality and the consequent issues, they will tend to influence or make poor decisions. There is a danger that the RELU initiative becomes dominated by stakeholders who become self serving, losing sight of the critical issues and therefore encourage the wrong priorities. However, if RELU and its teams establish a sustainable strategy based on the correct critical priorities, sound science and practical reality, it can be a major force for good. RELU must be prepared to robustly challenge and test Government strategy. Recognising that local authorities, as opposed to regional government, are better equipped to deliver a land use strategy would be a good beginning!