

RURAL DEVELOPMENT PROGRAMME 2014 – 2020

CONSULTATION RESPONSE FORM

DARD is inviting written responses to the consultation paper on the Rural Development Programme 2014 – 2020. Respondents can reply to all of the questions, a selection, or provide additional comments depending on where their interests lie. To enable the Department to process your comments quickly and efficiently we would encourage you to use the following 'Response Form'.

The consultation will take place over a 16 week period and closes at 5pm on 21 October 2013.

Please send your response to either:

E-mail: ruralpolicy.branch@dardni.gov.uk

Or

RDP Management Branch
Department of Agriculture and Rural Development
Room 407
Dundonald House
Upper Newtownards Road
Ballymiscaw
Belfast
BT4 3SB

Queries

If you have any questions about the contents of the consultation document or would like a hard copy of the response form posted out to you, please contact:

Name: Cathy Moore

Name: Gillian Graham

Tel: 02890525410

Tel: 02890765354

E-mail: Cathy.Moore@dardni.gov.uk

E-mail: Gillian.Graham@dardni.gov.uk

Publication of Responses

At the end of the consultation period, we intend to publish, on our website, copies of all responses received. We will therefore assume that your response can be made publicly available in this way unless you indicate clearly in writing that you wish all or part of it to be excluded from this arrangement.

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1. Name/Organisation

Landscape Institute Northern Ireland (LINI)

Title Mr Ms Mrs Miss Dr

Please tick as appropriate

Surname

Mullin

Forename

Pete

2. Postal Address

Policy Consultant – LINI

C/O PLACE - 40 Fountain Street,

Belfast

Postcode BT1 5EE

Phone 0777 575 2010

Email petem@landscapeinstitute.co.uk

I have made comments on the following sections (please tick the relevant sections)

Priority 1	<input checked="" type="checkbox"/>
Priority 2	<input checked="" type="checkbox"/>
Priority 3	<input checked="" type="checkbox"/>
Priority 4	<input checked="" type="checkbox"/>
Priority 5	<input checked="" type="checkbox"/>
Priority 6	<input checked="" type="checkbox"/>
Delivery Mechanisms	<input checked="" type="checkbox"/>
Funding & Prioritisation	<input checked="" type="checkbox"/>
Additional Comments	<input checked="" type="checkbox"/>

CONTENT OF THE PROPOSALS

European Union - Priority 1

Fostering Knowledge Transfer and Innovation in Agriculture, Forestry and Rural Areas

Question 1

Is there a need to provide broader vocational training in the agri-food and forestry sectors and what particular areas do you envisage being targeted?

Comment

Yes LINI (Landscape Institute Northern Ireland) believe that education and training should be at the core of the new RDP. In addition, as Agri-Environment Schemes (AES) are the only mandatory element of the RDP, adequate resources need to be provided to ensure appropriate, education, training and advice is directed towards the delivery of AES.

LINI believe that training / advice for farmers and landowners should aim further than the current legislative baseline by addressing areas such as :

Landscape Planning, Management & Protection
Management of Priority Habitats and Species,
Sustainable Soil Management
Invasive Species Awareness,
Tree and Plant Disease Awareness
Green Infrastructure Delivery / Benefit

We believe that advice and training for farmers should introduce principles of progressive landscape stewardship (i.e Guiding landscape change through appropriate management, protection and planning) This would be achieved by embracing the achievable principles set within the European Landscape Convention (as ratified by both the UK and Ireland) and through utilisation of the National Landscape Character Assessment as an evidence baseline.

In addition understanding principles of Ecosystem Services and Green Infrastructure should be prioritised within any training as these offer excellent opportunities to deliver both public good and economic benefit.

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LINI also believe that DARD should utilise the expertise within NIEA, Environmental NGOs and The Landscape Institute to design and deliver training and advice. Central to this would be the Landscape Institutes wide access to current best practice nationally and internationally which could be of significant value not only to farmers and landowners, but the Department.

Provision also needs to be made for farmers and landowners to select from a number of 'pre-determined' environmental management study visits (to ensure quality of visits, usefulness of lessons learned and local applicability) to other EU members States to witness case studies first hand and learn from experiences elsewhere.

The Landscape Institute would also take this opportunity to urge DARD to consider the value which experienced Chartered Landscape Architects could add to the NI Forestry Service and DARD generally – For example The Forestry Commissions for Scotland, Wales and England all currently employ directly and/or engage Chartered Landscape Architects to advise on design and implementation matters at local and strategic level relating to woodlands and forests for public good, green infrastructure and 'fit' in relation to particular landscape typologies.

Question 2

What do you think the role of the innovation broker should be and what skill sets should they have?

Comment

Innovation brokers need to have a wide range of skills including a good knowledge of environmental issues to guide farmers and landowners in a progressive manner. Brokers need to be aware of all expert advice available to them and should have a guidance / checklist which they can refer. This could also provide referenced case study scenarios and examples of best practice elsewhere.

Ultimately brokers should be able to access expertise within NIEA, environmental NGOs, The Landscape Institute and others to adequately fulfil their role.

In addition they should where possible be working with local organisations (such as LINI and NIEL) capable of assisting with the design and delivery of

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good practice guidance, casestudies and study visits on good environmental and landscape management.

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European Union - Priority 2

Enhancing Competitiveness of all Types of Agriculture and Enhancing Farm Viability

Question 3

In light of the restrictions posed by the definition of 'young farmer' in the proposed European legislation, and the findings from previous research and experience, do you agree that there is no case for a specific support scheme for young farmers? If not, why? And what else should be taken into account?

Comment

To address an aging profile of NI farming community, LINI would support that young farmers should be incentivised to remain or enter into the industry – however appropriate education, training and awareness as described in answer to Question 1 above, needs to be central to any incentives offered.

Question 4

With regard to funding levels, should there be a minimum expenditure limit? Do you think the funding levels at each tier and the maximum limit is appropriate?

Comment

No comment

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Question 5

Are the entry criteria appropriate and in proportion with the level of funding or should there be additional requirements?

Comment

LINI understand the business need for farmers and landowners to consider introduction of renewables and other diversification, however would urge that Environmental Impact Assessment (including Landscape & Visual Impact and in particular Cumulative Impact Assessment) form part of these development applications, thus ensuring no unintended environmental affects are generated (including wider land use changes to maintain AD plants at optimum capacity).

Additional considerations should reward joint applications were multiple farmers and landowners are working collaboratively to deliver proposals which offer wider benefit (should encourage longer term planning / visions for lands)

Question 6

Are the proposed areas of expenditure the most appropriate to improve the competitiveness and development of farm businesses? Should renewable energy technologies be included in a farm business development grant scheme?

Comment

Whilst LINI appreciate renewables form an important and established part of the energy mix – we would have reservations with any proposal which could result in further incentives and subsidisation without caveats. Should the Department determine that additional incentives would be beneficial, LINI believe it appropriate that any offer of grant support should include caveats that Environmental Impact Assessment (including Landscape & Visual Impact and in particular Cumulative Impact Assessment) should accompany any development application which the grant applies.

Caution should be exercised, as it is considered inappropriate for the Department to set out funding mechanisms for ventures with potential to cause direct or indirect (and cumulative) negative environmental impact.

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Question 7

To what extent should development group members be reimbursed for collating and disseminating their farm performance?

Comment

No Comment

Question 8

How should participants in development groups be selected?

Comment

No comment

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European Union - Priority 3

Promoting Food Chain Organisation and Risk Management in Agriculture

Question 9

Are the proposed sectors and type of expenditure for the Processing Investment Development Grant Scheme the most appropriate to improve the competitiveness and development of food processing businesses?

Comment

There is need for intervention to direct food production systems to be more sustainable, more dependant on natural renewable systems than on fossil fuels, eg fixing nitrogen through integrated crop management rather than relying on nitrates from natural gas.

Question 10

What do you think of the funding levels at each tier and is the maximum limit appropriate?

Comment

No Comment

Question 11

What additional types of group or area of expenditure should be included in the scope of the cooperation scheme proposal?

Comment

Collaborative (cooperative) management plans should be encouraged and rewarded, in particular those farmers and landowners preparing strategic long term proposals responding appropriately to existing natural systems and catchments such as River Basins and Landscape Character Areas. LINI would particularly welcome proposals incorporating Green Infrastructure objectives for public and environmental good, which could in turn be applicable for additional European funding streams.

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European Union - Priority 4

Restoring, Preserving and Enhancing Ecosystems dependent on Agriculture, Food and Forestry Sectors

Question 12

Do you think that the proposed structure of the next Agri-Environment Scheme is appropriate?

Comment

LINI is generally supportive of the broad principles outlined within the structure of the AES, however more detail of the structure would be welcome before full support could be given.

Given the reduced budget for the new RDP, LINI would support the view that the AES should be prioritised to deliver the maximum environmental outcomes. We would therefore, on the limited information provided, be supportive of a targeted wider countryside element (focusing on priority species) as well as a targeted protected area element. We would however call for further information on the 'suite of options' under consideration and wider consultation with stakeholders around the design and intended outcomes within this Priority. As well as eNGO's, NIEA ecologists and landscape architects should be engaged in the design of this priority and its component parts.

Question 13

Do you agree that funding should be prioritised in the first instance to support the management of designated sites?

Comment

LINI support the core principle of the European Landscape Convention (ratified by both UK and Ireland) which emphasis that 'All landscapes matter'.

Therefore whilst it is important that our designated sites (including designated landscapes) are adequately protected and appropriately managed. There is a danger that simply prioritising designated sites could result in isolation, fragmentation and disconnection with the wider countryside.

It is therefore essential that 'All' our landscapes are appropriately managed

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and planned with connectivity prioritised and rewarded.

As stated previously LINI would particularly welcome proposals responding to objectives and recommendations within particular Landscape Character Areas and or natural based system

LINI believe that the National Landscape Character Assessment for Northern Ireland (which we understand is currently being reviewed and updated by NIEA) is the appropriate tool to provide a baseline for future strategic management, planning and protection of our landscapes (be they designated or undesignated rural, peri-urban or despoiled).

Question 14

Do you think that an element of training should be a compulsory part of the scheme?

Comment

Yes – training, education and advice must be central and a compulsory element of the scheme. The department should utilise the expertise within NIEA, environmental NGOs, the Landscape Institute and Other appropriate organisations/ charities to design and deliver appropriate training and advice.

As detailed aspects of landscape protection, management and planning can be a complex area; farmers and landowners require support of specialist advisors in order to fully understand the requirements of the schemes and how best they can achieve the desired outcomes. While initially seeming a costly administrative burden, mandatory advice and training are much more likely to ensure environmental outcomes are achieved and in turn deliver better value for the investment of public money. Further funding streams may present form Europe as a result of Green Infrastructure initiatives.

Question 15

Do you think the co-operation measures should be used to provide higher levels of funding to farmers who take collective action through the agri-environment scheme: for example, in a river catchment area?

Comment

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Yes – LINI is very supportive of this proposal.

In addition to River catchment areas, we would also as highlight previously strongly encourage the utilisation of NIEAs National Landscape Character Assessment as a potential baseline and vehicle for delivery of appropriate co-operative management.

There are 130 Landscape Character Areas (LCAs) in Northern Ireland, each with its own particular characteristics, pressures, sensitive's and opportunities.

LINI consider that this would be a finer grained mechanism than for example river basin management.

In addition LCAs are generally smaller in terms of area than full river catchment areas, therefore it is more feasible that a higher percentage of farmer and landowner participation could be achieved.

In order to secure widespread participation in collective action, higher levels of funding should be available otherwise good environmental work by some farmers may have reduced impact due to the non-participation of neighbouring landowners, e.g. invasive species management, fragmentation of habitats etc. Given the general low-level of experience of farmers coming together to design and submit collaborative applications to deliver environmental outcomes, NIEL suggests that DARD allow the potential for 'third-party' applications (e.g. from eNGO's, Charities, Trusts) on behalf of landowners for catchment scale projects.

Question 16

Should the next agri-environment scheme include an Organic Management Option, providing an ongoing payment to organic farmers that continue to farm organically certified land? Please provide evidence/reasons to support your views.

Comment

While uptake of existing support measures for organic farming is low, LINI believes that given the recent well documented concerns regarding the decline in pollinators (and the link to neonicotinoids) support for organic farming should be retained given its ability to deliver for biodiversity through the adoption of more environmentally friendly agricultural management practices. We believe DARD should investigate the barriers that landowners are facing that currently limits uptake of organic farming and provide greater encouragement and promotion of this nature friendly farming given its ability

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to enhance ecosystem services and so deliver greater public good.

Question 17

There are opportunities to plant woodland on farms. What do you think are the barriers that farmers and landowners face, particularly those letting their land in conacre or whose land has agricultural limitations?

Comment

Northern Ireland has the lowest percentage of woodland cover of any part of the British Isles (UK and Ireland). Whilst historic and cultural landownership and patterns have a part to play in this fact, a major barrier to landowners planting new woodland on farms is the necessity to take this land out of agricultural production for many years and so removing flexibility from their grass-based farming system.

One option may be to allow limited and pre-defined agricultural use of woodland areas after the trees are mature enough as not to be susceptible to damage by livestock (free range hens, etc) or managing woodlands using foraging animals.

In principle LINI are supportive of woodland expansion across Northern Ireland, however we would be keen that a considered and strategic approach is taken to any uptake. As mentioned previously utilisation of National Landscape Character Assessment as an evidence baseline could offer a workable mechanism for strategic woodland prioritisation. This would in turn also provide potential coordinated delivery of wider Green Infrastructure objectives whilst avoiding erosion of land types or habitat of environmental value / priority.

Question 18

The proposed EC regulation makes provision for establishment and maintenance payments but not income foregone payments. What are your views on the impact this would have on land availability for new planting?

Comment

Northern Ireland has one of the lowest percentage woodland cover in Europe and is failing to reach preset targets, therefore income foregone

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payments could be a beneficial mechanism to secure increased woodland cover. However as previous, we would strongly encourage a strategic approach to implementation of woodland in favour of the current system which results in random uptake across the province.

There should be basic prioritisation approach adopted. As previous, (the soon to be updated) National Landscape Character Assessment could provide a valuable and workable tool to support this.

Weighted recognition and reward should also be considered for cooperative initiatives which would deliver Green infrastructure for public and environmental.

Question 19

Do you agree that if Pillar II Areas of Natural Constraint support is primarily an income support measure, support from Pillar I to those areas is the more appropriate route? If not, why?

Comment

LINI agree that ANC support is primarily an income support measure and therefore support from Pillar 1 is a more appropriate route. However, given the already considerable reduction in Pillar 2 funds, this does not mean that monies should be moved from Pillar 2 to Pillar 1 (previously referred to as reverse modulation) in order to fund this income support.

Furthermore while we agree with support for ANC farming this support must also be on the basis of controls that would reduce the risk of environmental degradation from undergrazing/ overgrazing as well as farming practices that have negative impacts upon soil and water quality and the general aesthetic qualities and characteristics of the landscape. While an income support measure, LINI believes that public money should deliver public good through positive environmental outcomes.

This should include consideration of Green Infrastructure in all its forms.

Question 20

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Following on from this what changes may be necessary to the architecture of the new agri-environment programme to ensure that any environmental issues and concerns arising from this approach are adequately addressed?

Comment

No comment

European Union - Priority 5

Promoting Resource Efficiency and Supporting the Shift towards a low Carbon and Climate Resilient Economy in Agriculture, Food and Forestry Sectors

Question 21

Should renewable energy technologies be included in a farm business development grant scheme?

Comment

In general LINI maintain that there is need for food production systems to be more sustainable, more dependant on natural renewable systems than on fossil fuels, eg fixing nitrogen through integrated crop management rather than relying on nitrates from natural gas.

Bioenergy forms an important component of the mix of technologies required to boost our renewable energy capacity to fulfil the Northern Ireland Renewables Obligation (NIRO).

However, as outlined previously while we are supportive of renewable energy technologies at farm level, such proposals must be accompanied by an EIA where appropriate to address any issues if unintended consequences. The noise, water, odour and traffic impacts as well as landscape & visual impacts are potentially problematic issues with renewable energy technologies.

Of particular concern for LINI is the cumulative visual impact of one off structures of an industrial nature across the landscape. For example, one off wind turbines are becoming an increasing feature. Planning applications often only consider each application in isolation, therefore the cumulative build-up has potential to be detrimental to other sectors (i.e Tourism, inward investment etc).

Another example is the number of applications for on-farm anaerobic digesters which could rise significantly through the provision of grant support as proposed through the Business Investment Scheme.

As outlined previously the National Landscape Character Assessment should be referenced as an evidence baseline to determine appropriateness (including adaptive recommendations) for development within particular landscape character areas and types.

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A strategic approach, with a clear vision of what wind and AD is intended to achieve in terms of contributions to renewable energy across Northern Ireland, is required to limit the cumulative build-up of structures and building across the countryside and prevent wide scale negative changes in the landscape and land management.

Question 22

Which renewable energy technologies, if any, should be supported?

Comment

LINI are content for a range or mix of renewable technologies to be considered for support. However each proposal must be accompanied by an EIA and an assessment of the cumulative impact of these technologies as highlighted previously.

Question 23

Should support be restricted to renewable energy technologies where the majority of energy produced by the installation is being used on-farm in direct support of agricultural activities?

Comment

Agree that this may be a beneficial mechanism and could discourage or at least not support the external venture capitalist approach which is currently providing little benefit to farming communities locally.

Question 24

The proposed Forestry Plantation Scheme aims to support larger new planting projects with wood production as a major objective. Do you think that the scope should be expanded to provide support for larger new woodlands which provide enhancement of biodiversity and local community benefits of visual amenity and public access?

Comment

LINI agree that the scope should provide support for larger new woodlands which provide enhancement of biodiversity and local community benefit of visual amenity and public access?

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However there should be a National Woodland Strategy which prioritises suitable locations for woodlands, rewarded with funding mechanisms that would minimise inappropriate planting in areas which are not considered priority.

Introduction of woodlands and forests should respond to recommendations and objectives located within the National Landscape Character Assessment.

Woodlands should be designed to 'Fit' their host environment and a collaborative approach between farmer and landowners should also be encouraged to achieve meaningful large scale woodlands.

Professional advice should be encouraged and rewarded with new woodlands designed to enhance or protect priority species as well as deliver wider ecosystem services including recreation and rural tourism.

Question 25

Do you think that slurry/manure processing equipment, such as slurry separators, should be funded under Manure Efficiency Technology Scheme? If so, what uptake would you forecast?

Comment

No Comment

Question 26

What level of demand do you see for advanced slurry spreading systems in future tranches of Manure Efficiency Technology Scheme?

Comment

No Comment

Question 27

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Should farmers in the Manure Efficiency Technology Scheme be required to provide feedback on the amount of slurry spread, fertiliser use, etc to help track behavioural change?

Comment

No Comment

Question 28

What are the current barriers that prevent farmers from soil testing and drawing up nutrient management plans?

Comment

Soil is the foundation of agriculture, LINI believe that the industries approach to soil management needs to be transformed to achieve greater and more sustainable land cover typologies and crop production. Further, soils offer a direct and valuable mechanism to assist carbon sequestration, it is therefore essential that appropriate management and practice be applied to maximise this potential.

Barriers include a lack of understand of the wider value of soils to meet Climate change objectives. Education is considered key to this.

Question 29

Would farmer discussion groups be a suitable delivery mechanism for the Nutrient Management Scheme?

Comment

Yes – farmers are more likely to listen to best practice and the experiences of their peers through discussion groups and farm walks than government interventions.

Question 30

Are there any other measures which should be considered under the Nutrient Efficiency Scheme?

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Comment

LINI believes that DARD should liaise closely with NIEA Water Management Unit in the design of additional measures. WMU could also make catchment specific recommendations based on water quality data and the ecological status of our waterbodies.

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European Union - Priority 6

Promoting Social Inclusion Poverty Reduction and Economic Development in Rural Areas

Question 31

How effective do you think the proposed priority 6 schemes (Rural Business Development, Rural Business Investment, Rural Tourism, and Combating Poverty and Social Isolation – Basic Services, Village Renewal) will be in meeting the needs of the sector? Please provide reasons / evidence to support your views.

Comment

While we broadly agree with the priority 6 schemes as outlined, we believe that our natural and built heritage has much to contribute to Northern Ireland's rural 'nature' tourism potential.

Sustainable Development should be the only type supported in rural areas. Development which is not considered sustainable (i.e Does not meet the 3 pillars of sustainable development – economic, environmental and social) should be disregarded.

Question 32

How might these schemes (Rural Business Development, Rural Business Investment, Rural Tourism, and Combating Poverty Social Isolation – Basic Services, Village Renewal) be improved upon to meet the needs of your sector? Please provide reasons / evidence to support your views.

Comment

As per our answer to Question 31, LINI believe that support will be mutually beneficial in terms of habitat, species and built heritage improvement as well as boosting the rural economy by improving our rural 'nature' tourism product through the development of wildlife tourism on less agriculturally productive land.

Question 33

On which issues should the proposed All Island Co-operation scheme focus in order to address deprivation and disadvantage in rural areas most effectively? Please provide reasons to support your views.

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Comment

We believe All Island Co-operation should focus on environmental issues of common interest that could improve our rural nature tourism potential. For example measures to deliver cross-border cooperation on designated sites or on shared river basin and landscape character areas could provide significant environmental benefits, boost the rural economy and help alleviate deprivation and isolation on both sides of the border.

It is essential that policy and actions on either side of the legislative boundaries work together and to not diverge in a self serving manner to the detriment of the wider landscape, economy and population.

Question 34

Should a scheme to address deprivation and disadvantage through North/South Co-operation focus only on those regions in the north adjacent to the border, or should it cover all rural areas in the north? Please provide reasons to support your views.

Comment

If we intend to boost rural tourism by improving the quality of our natural environment on both sides of the border, it would seem most appropriate to focus on those regions in the North adjacent to the border (in particular those within the visual catchment of the border).

For information LINI are actively promoting the preparation of a Landscape Strategy for Northern Ireland, similar to that already drafted in the Republic of Ireland.

Further we consider it essential that these strategies be prepared with a joint focus to avoid policy polarisation which could negatively impact landscape management of for example designated lands North and South.

As stated previously LINI would reinforce the achievable messages from the ratified European Landscape Convention that 'All Landscapes Matter'. Therefore cooperation North / South is also encouraged on a European level to minimise regional impacts to the wider landscape and provide benefit to all of Europe's citizens.

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Finally a cooperative approach will help to deliver cross border wildlife corridors, green infrastructure, tourist routes / and other economically beneficial initiatives etc.

LINI agree it may be practical to focus funding in border regions to achieve real results.

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DELIVERY MECHANISMS

Question 35

How much of the programme budget should be allocated to the LEADER approach, and why?

Comment

No Comment

Question 36

Which measures/schemes should be delivered through the LEADER approach, and why?

Comment

No Comment.

Question 37

Which measures/schemes should DARD deliver itself and why?

Comment

LINI have no comments, however would simply encourage DARD to continue to coordinate and collaborate closely with the other Departments to avoid 'siloed' governance
(In particular NIEA – specialists including Landscape Branch) should be consulted to ensure appropriate response to emerging strategies.

Question 38

Which measures should be delivered by bodies (including Councils) other than Local Action Groups and why?

Comment

No Comment

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FUNDING SCENARIOS AND PRIORITISATION OF INTERVENTIONS

Question 39

If there are insufficient funds to support the proposed programme should the available funds be distributed across all the proposed schemes?

Comment

LINI believes that as Agri-environment is the only compulsory element within the RDP it should be prioritised and funding should be directed towards landscape management, planning and protection.

This should aim to avoid loss of the positive characteristics of our limited and unique environments which are being rapidly eroded. It should halt biodiversity loss, encourage habitat and species conservation/management, improvement in water quality, promotion of natural flood management and climate change mitigation and adaptation.

We believe that as RDP is funded by public monies its priority should be to provide public good in the form of ecosystems services, green infrastructure and positive landscape character utilising the National Landscape Character Assessment as an essential evidence baseline.

Question 40

If there are insufficient funds to support the proposed programme which schemes do you consider to be the highest priority and why?

Comment

No Comment

Question 41

If there are insufficient funds to support the proposed programme should funds be transferred from Pillar 1 (Direct Payments) to Pillar 2 (Rural Development) to bridge the funding gap? If yes how much?

Comment

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In order to deliver the maximum benefits for our environment, LINI believes that it is important to maximise the amount of funding within Pillar 2 and therefore we support the option to transfer funds from Pillar 1 to Pillar 2 to the maximum stated level of 15%. Given the disproportionate cuts to Pillar 2 as part of the Multi-annual financial Framework the potential to transfer these funds from Pillar 1 could go some way to redressing this imbalance. We would be strongly opposed therefore to any proposal to transfer funds from Pillar 2 to Pillar 1 and to do so may make it impossible for Northern Ireland to meet its environmental obligations. LINI therefore supports the principle of maximising the public monies available to deliver public good through the new Rural Development Programme.

ADDITIONAL COMMENTS ON THE RURAL DEVELOPMENT PROGRAMME 2014 – 2020

If you would like to put forward any additional comments on the Rural Development Proposals 2014 – 2020 please use the following section:

Comments

Given the lack of detail in the proposals it is very difficult for LINI to provide definite responses to many of the questions in the document. We would like however to make the following additional points:

General Comments:

- The UK and Government (including Northern Ireland) made a commitment when it ratified the European Landscape Convention, that the primary objectives of the Convention would be reinforced through policy. The ELC defines landscape as: “An area as perceived by people, whose character is the result of the action and interaction of natural and/or human factors”. (Council of Europe 2000) It highlights the importance of developing landscape policies dedicated to the protection, management and creation of landscapes and establishing procedures for the general public and other stakeholders to participate in policy creation and implementation. LINI believe that it is essential that the RPD includes this commitment and simply recognise that ‘All Landscape Matter’ and that farming and rural development have an essential role to play in this objective.
- The relationship between the environmental ingredients of the RDP and the Greening aspects of Pillar 1 need greater clarity and with such a significant portion of the budget directed towards ‘greening’ a clear vision and mechanism for delivery is essential.
- LINI believe that The National Landscape Character Assessment for Northern Ireland could form a workable and realistic evidence baseline mechanism for future evolution of our lands. It offers a framework for all public intervention systems into agricultural land management – Vision setting, advice, incentives, regulation and enforcement.
- Support for Green Infrastructure and ecosystems services needs to

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be central to the new RDP and a coordinated approach applied.

- Farmers and landowners should be rewarded for providing public good in relation to ecosystem services and environmental improvement.
- Reward for positive cooperative approaches to land management.
- As Agri-environment is the only compulsory element within the RDP it should be prioritised and funding should be directed towards halting biodiversity loss, habitat and species conservation, improvement in water quality, promotion of natural flood management and climate change mitigation and adaptation
- Pillar 2 Agri-environment monies should be directed towards providing targeted additional environmental benefit. This limited financial resource should not be utilised to pay for measures that should already be addressed and enforced by Pillar 1 measures such as *Cross compliance*, *Greening* and *ANC*.
- Given the budgetary constraints within Pillar 2 we support the transfer of 15% funding from Pillar 1 to Pillar 2 and believe this funding should be ring-fenced for HNV farming
- The fact that the proposals for the new RDP seems to closely reflect the current RDP which has failed to halt the loss of biodiversity would remain a matter of concern
- DARD should work with NIEA, Environmental NGOs and The Landscape Institute in the design and delivery of the new AES
- Political expediency must be resisted in relation to over simplification of the RDP with an over-riding aim of getting the money 'spent' as opposed to the efficient and effective allocation of money to deliver environmental good
- In general LINI maintain that there is need for food production systems to be more sustainable, more dependant on natural renewable systems than on fossil fuels, eg fixing nitrogen through integrated crop management rather than relying on nitrates from natural gas.

Soil is the foundation of agriculture, LINI believe that the industries approach to soil management needs to be transformed to achieve greater and more sustainable land cover typologies and crop production. Further, soils offer a direct and valuable mechanism to assist carbon sequestration, it is therefore essential that appropriate management and practice be applied to maximise this potential.

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Thank you