

Supplementary written evidence submitted by the Countryside and Community Research Institute (CCRI), University of Gloucestershire. (1)

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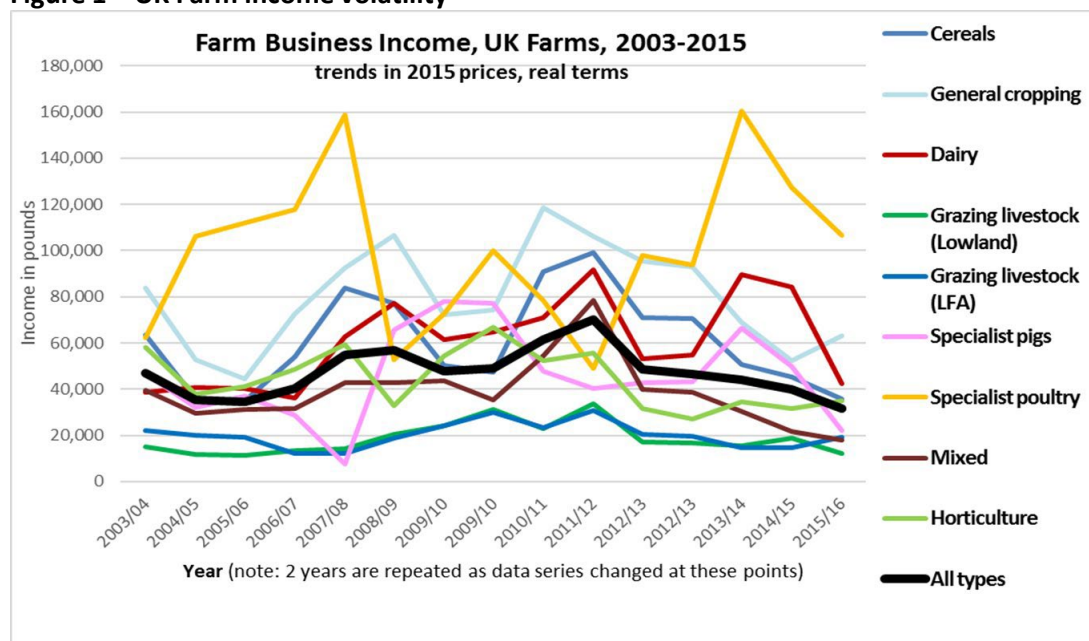
1. Why will income foregone not work? We have heard it isn't attractive enough, but can we be more precise. What payment methodology should we use instead?

Income foregone (IF) is based upon several assumptions, and has several important implications for how a scheme such as ELMS operates and how it will be perceived by farmers and by the public.

Firstly, the underpinning notion of IF is that in order to encourage farmers to produce environmental benefits for wider society that are not sufficiently provided via market mechanisms alone, it is only necessary to offer them a '**compensatory**' payment equal to the value of the agricultural income that would be foregone by them, if they were to agree to produce these benefits. It therefore sets the price of the environment at the level of the 'opportunity cost' to production, under whatever the current market conditions are. Those conditions are likely to be uncertain and variable, and increasingly so, in future.

As a result of the full decoupling of farm support from agricultural production since 2005, farmers today face market conditions which are largely market-driven. As data clearly shows, agricultural commodity markets have become increasingly volatile over the period while this policy change has been in process, with knock-on effects for farm business incomes across the UK (see figure 1). In the graph, it is notable that the sectors which have relied most heavily for their incomes from the CAP, in the past – via payments under BPS and agri-environment schemes – have both the lowest incomes, but also the incomes showing most stability, over time: the notable example is grazing livestock farms in both upland and lowland situations.

Figure 1 – UK Farm income volatility



Source: derived from Defra Farm Business Survey data, longitudinal analysis.

Volatility in future farm incomes will be exacerbated by the predicted impacts of other global challenges. These include the element of built-in anthropogenic climate change that we can expect as a result of past emissions trends, and demographic changes including a growing UK population and growing demands on land for an increasing range of uses such as new housing, infrastructure (e.g. transport and utility provision), leisure and amenity, carbon sequestration, and fibre and energy production.

If our future environmental assets and their management are directly linked to agricultural market prices and incomes in these volatile conditions, this sends a signal to farmers that choosing to earn income from such management in future is not a secure long-term investment decision, as it will offer them no particular benefit over their short-term cropping and stock-rearing decisions. This is not a helpful message, when seeking to encourage long-term sustainable practices and land use and management decisions. Past evaluations show clearly that one of the attractions to farmers of government schemes is that they can provide a more certain income stream than that which comes from the market. But this is only possible if payment rates are not tied too closely to income foregone – in the late 1990s many farmers became very disillusioned with schemes when payment rates reduced, because agricultural incomes were going through a depressed period.

Secondly, in order to calculate ‘income foregone’ it is necessary to prescribe the management actions that farmers must take, in return for the payments that they receive: that is how you calculate how much income they will forego. More than 40 years of experience with this kind of approach in the UK has demonstrated that management by prescription, where prescriptions are determined and agreed in advance for a period of multiple years and based upon largely specialist and rather standardised technical advice about what management should generate which benefits, fall well short of what is needed to achieve those environmental benefits in an efficient and effective way. Local conditions vary, including geological, pedological, climatic and weather variations and variations in respect of the way that land responds to different farming practices. This type of variation is increasing, as climate change is predicted to cause more extreme weather events, with drier and hotter summers in southeast England leading to more frequent droughts, and warmer and wetter and more stormy conditions across much of the country in the winter months, leading to more flooding and storm damage. The natural environment responds to these changes as best it can, so events like breeding birds fledging chicks, or native plants flowering and setting seed, will happen at different times in different places and in different years, in ways which will not be easy to predict. Any effective land management system to deliver environmental outcomes needs to be sensitive to these variabilities and to allow for modification of management practices year on year and from one place to another, so as to ensure the desired outcomes (the notion of adaptive co-management is pertinent, here). This is not possible if management at farm or field level is prescribed years in advance, and payments are conditional on following those detailed prescriptions.

In Exmoor, the Graze the Moor project has been working for almost a decade now to demonstrate that the agri-environment prescriptions of past schemes were inappropriate for south-west England moorland habitats and that, because conditions are warmer and the growing season is longer than in the northern uplands, it makes sense to graze the heather and grasses year-round, extensively and using a mix of livestock rather than requiring all cattle grazing to cease, overwinter. Habitat monitoring in both Exmoor and Dartmoor clearly shows the negative environmental impact of applying inappropriate upland management prescriptions to these internationally important habitats and landscapes, since the 1990s. Inappropriate management was prescribed as a result of a lack of sensitivity to local knowledge and local conditions, even though the earliest agri-environment schemes in these 2 places – the ESAs – were supposed to be ‘tailor made’ to retain sensitive and

locally-appropriate management. Once ESAs were replaced with national level Stewardship schemes, the prescriptions became both more standardised and more environmentally ambitious, but they have failed to reverse declines in the environmental quality of these moorland habitats and the cultural landscapes that they constitute.

The combination of volatile prices and incomes, and variable environmental conditions, means that calculating ELMS on income foregone risks being challenging, costly, bureaucratic and potentially ill-conceived (if prescriptions are not set locally, through co-management). It also presents farmers with a relatively unattractive future offer which will do nothing more than cover their short-term opportunity costs, bringing little additional security and requiring more effort. Scheme application, entry and successful implementation takes up-front planning, commitment, energy and enthusiasm. These attributes need to be encouraged by a payment approach which can reward those qualities and commitments more fully through a respectful and reciprocal agreement in which risks and uncertainty are acknowledged and shared between the parties.

Environmental quality is a long-term need and it requires long-term commitment to sensitive and intelligent management. It needs to be resilient to farming system change over time and indeed, it needs to help incentivise the transformation of farming systems towards greater environmental sustainability. Seeking to encourage farming systems 'shift' is another reason why IF is not a good model, as it provides no incentive for that, dealing only with micro-scale and atomistic management practices, divorced from a consideration of the whole farm and its underlying business model. Some extensive land management approaches can actually be profitable, once the farming system and business model have fully integrated them – the trick is in having the confidence to choose the more challenging business option of adding value, rather than being just a commodity producer. Future ELMS could actually build in some way of encouraging system shifts towards more nature-friendly farm business models, if they can move away from an IF approach. The IF model centres around a set of detailed management prescriptions which can look to a farmer like a rigid rule-book which they have to be willing to adopt, no matter what might happen to their business circumstances over the coming decade.

Nevertheless, it is unavoidable that some element of 'opportunity cost' consideration will be a part of future ELMS payment – if you don't offer enough to counteract the pull of market incentives to farm in more damaging ways (these still exist, and will continue for some years yet), farmers won't respond to a voluntary payments approach. But to tie the system into the cumbersome and uncertain IF model is to send the wrong signals to farmers concerning what you value, and why, and to risk getting the management options wrong, too often. IF frequently pays more for actions of lower environmental value, and less for those things which are most valued; and it will not pay at all, if a particular farming approach of business model is not generating a conventional agricultural income that can enable the IF calculation.

A more suitable approach would be to focus on an agreed range of desired and feasible environmental outcomes and then work out how to specify these in more detail, and then to consider what the public purse is willing to pay, in a broader and more general way, for their delivery by farmers. The new approach should focus on multi-annual agreements for a pre-agreed level of financial support in a specific geographical context, in return for delivery of the agreed outcomes. This would involve a shift of funding approach towards a landscape-scale 'project'-style contractual relationship, between 1) individual large farms and estates or 2) groups of adjacent farms working together and supported by excellent facilitation and advice; and the government contracting with them on behalf of society at large.

Project-scale payments for a set of agreed environmental outcomes can be agreed through a combination of top-down estimation and bottom-up 'offer', in the way that many other business negotiations are concluded when the precise costs of delivery are unknown, particularly to the buyer. The negotiation will involve considering market prices and management costs, as the IF formula does, but it will also consider other issues such as different potential management strategies and the provision of advice and monitoring to support effective delivery, as part of the package. Agreement on the price will occur when both parties to the agreement feel that they are getting enough in return for what they are putting in. This is a pragmatic approach which more closely resembles how deals are struck in other areas of policy, where complex outcomes are desired.

2. Mechanisms for blended public/private finance in ELM.

Farmers in some areas of England are experiencing an *ad hoc* form of blended finance, already. One example is where water companies are paying farmers in relation to actions to benefit water quality. CCRI work with Thames Water assessed a project to reduce the instances of metaldehyde in water, upstream from abstraction points (Hobbs 2021). The key points highlighted by that work is that Thames Water are only prepared to pay the farmers for the ecosystem service (ES) that they are requesting. As a result, the payments offered to farmers are much lower per hectare (starting at £2/ha) than might have been anticipated. Nonetheless, the provision of free advice and regular visits by advisers were valued as highly by farmers involved in the project as the ES payments, and the focus of advice was on how to achieve a gradual transition away from metaldehyde towards ferric phosphate, and more careful application, rather than compensation for income reductions.

Thames Water is also facilitating an Innovative Farmers trial in the Evenlode river catchment, in which the CCRI has some involvement ([Innovative Farmers, 2021](#)). Here, the company has funded farmers to experiment with adopting no-tillage and cover crops, to determine whether these practices reduce diffuse water pollution from agriculture.

An as-yet unpublished paper (Chivers *et al.*, 2021) reports how, upon interviewing catchment advisors from various water companies, it was found that many were concerned about identifying which farming practices and capital items water companies can continue funding farmers to adopt, as they are only entitled to fund farmers to install items which are not already required for compliance with legislation. The introduction of new Farming Rules for Water in 2018 (see Defra, 2018) seems to have led to the addition of several practices to those that farmers outside Nitrate Vulnerable Zones were henceforth obliged to undertake. This appears to have generated some confusion amongst catchment advisors concerning which measures and capital items they can continue to fund. Where items are no longer funded by the private water companies, farmers may no longer be installing them due to poor awareness raising and enforcement of the Farming Rules for Water (Chivers *et al.*, 2021).

Another example of private funding exists in Dartmoor and Exmoor, in the Mires Project. Here payments are similarly low, at around £4 per hectare, but the approach has much less focus on advice and engagement as part of the funding package. As a result, CCRI's evaluation found that the project initially struggled with local engagement and conflict over issues of managing sensitive archaeological land (Mills *et al.* 2010). Local contacts in both areas suggest that this issue persists today, more than ten years after that evaluation was published (Branfield *pers comms* 2021).

So, drawing from both these examples, we can suggest that where payments for individual elements of scheme provision are very modest, it may increase the likelihood of tension between funders and land managers. In both cases, the water companies like the independence and autonomy of their schemes, by comparison with the alternative of seeking to have their goals reflected in much broader

public-funded approaches. Nevertheless, if a broader approach can offer greater uptake and less friction, particularly if it provides the advice and facilitation to support management and system change on farms, then it can deliver for private funders. This is the approach undertaken by the highly successful Water with Integrated Delivery (WILD) project (Short 2015), and also being considered for the Cotswold PES pilot (Short and Phelps 2014).

3. The exit schemes for farmers leaving the sector.

Please note that this section has been particularly developed by Théo Lenormand, PhD student of Professor Dwyer at the CCRI and masters graduate from AgroParisTech, France, with support from Professors Julie Ingram and Janet Dwyer.

Defra presentation of the Exit plan [2] suggests that there were two objectives:

- 1) to help the sector to enhance productivity (with an underlying assumption that productivity will be key to improved GVA, farm incomes and economic sustainability); and
- 2) to facilitate generation renewal in farming (as the average age of farmers is 60 years [1] and 63% of farmers have no clear succession plan [3]).

UK farming has had significant public financial support since the 1960s, during which time sector productivity has been a key focus. The labour productivity of farming has increased over that period, while farm incomes have seen more varied patterns of change and farming’s contribution to UK GDP has reduced significantly [2]. Since 1945, the farm workforce and the number of commercial farms have reduced dramatically [2][4]. Some of this contraction has been facilitated by government-funded outgoer schemes, which we review briefly here, based upon evidence gathered in comparative agriculture studies across landscapes in England and Wales, as conducted over the past 6 years by students from AgroParisTech, France, hosted at the CCRI (Figure 1).

Figure 1 – comparing past retirement/outgoer policies in UK farming

CAP Farm Structures Schemes – Payments to Outgoers 1973→1984 [5]
Targeting “uncommercial units” with farmers between 55-65 years old, employing less than 1 family worker and 1 fte worker. Annual income threshold: <ul style="list-style-type: none"> • Lump Sum Payment : £₂₀₂₀ 9,720 and £₂₀₁₇ 10,800 • Annuity Payment : £₂₀₂₀ 864 and £₂₀₂₀ 1,555 Beneficiary’s holdings must be amalgamated or sold to the government / relevant body.
Performance: largely unsuccessful (averaged 25 applicants each year, in UK)
CAP Milk Outgoers Scheme 1984 [6][7]
Dairy farms – the typical farm targeted would be a small farm encouraged to exit dairying due to its low level/standards of equipment, targeting farms with under 40 Dairy Cows. <ul style="list-style-type: none"> • Approximately £₂₀₂₀ 2,246 per cow (5000L/year Yield) • If only 30 Dairy Cows, £₂₀₂₀ 67,392 payment Have to agree to abandon milking, (however, some return into milking has since been possible). Releases quota which assists consolidation among other farms.
Performance: relatively successful (75,000 producers across EC, by 1987 [8])
Pig Industry Restructuring Scheme 2001 [6]
Bids assessed on a value for money basis. <ul style="list-style-type: none"> • Approximately 60% of the tender value was awarded

- £₂₀₂₀ 181/Sow, average payment of £₂₀₂₀ 45,438
Beneficiary must remain out of the industry for 10 years

Performance: relatively successful (937 UK bids accepted, for 150 000 sows)

(Indirect incentive:) Milk Quotas 1987 → 2005 [10]

As soon as possible following their introduction in the UK, milk quotas could be exchanged on an open market, and also leased between producers. Effectively, this meant that farmers going out of dairying had the option of an “exit payment”, or a continuing income via leasing. Quota value fluctuated enormously before its eventual phase-out. For tax reasons, many farmers found it more profitable to gradually sell their quota rather than disposing of it in one single sale.

Potential Lump Sum Received for Quotas (£₂₀₂₀) [9][11]

Farm Size	30 Dairy Cows 4500L	45 Dairy Cows 5000L	60 Dairy Cows 6000L
Quota Value: 0.59£ ₂₀₂₀ /l	80190	133650	213840
Quota Value: 0.32£ ₂₀₂₀ /l	43740	72900	116640

Performance: quite successful, stimulating much farm amalgamation

(Indirect) Restructuring of the Land Market 1995 → today

(Indirect) Decoupled Direct Payments to Farmers 2003 → 2020

These mechanisms have allowed retirement or semi-retirement of farmers without letting the holding “go”:

- The restructuring of the rental market with increased freedom in types of rental agreement as well as increased control from the landlord.
- Direct payments to farms which increased/supported land values and rental values as the subsidy payment was paid per hectare.
- Significant needs for land among farms trapped in an output/input price squeeze in their business finances, and trying to increase labour productivity by expanding, *inter alia*[12].

Greater incentive to rent-out land mostly to nearby expanding farms. With possible rents going from £₂₀₂₀ 60/a* to £₂₀₂₀ 230/a* (bearing in mind that some landlords might retain some or all of the direct payments). If land was sold, prices also increased steeply.

Potential Annuity and Lump Sum Received for the farmland (£₂₀₂₀)

Holding Size	30a	90a	180a
Annuity Rented-Out Low Price £ ₂₀₂₀ 60/a*	1800	5400	10800
Annuity Rented-Out High Price £ ₂₀₂₀ 150/a*	4500	13500	27000
Annuity Rented-Out High Price £ ₂₀₂₀ 200/a*	6000	18000	36000
Total Value if Sold in 1990 £ ₂₀₂₀ 1080/a [15]	32400	97200	194400
Total Value if Sold in 2017 £ ₂₀₂₀ 7452/a [15]	223560	670680	1341360

Depending on the size of the holding, location, land and infrastructure quality, this can represent a very sizeable payment.

*Researcher fieldwork and [12] informed by [13] and [14]

Performance: successful but stimulating much amalgamation, and giving rise to the phenomenon of ‘ghost’ holdings

All economic values were here converted into values in 2020 prices (£₂₀₂₀) for the sake of consistent comparison.

Exiting Farming today

Before considering the challenges in exiting the industry now, according to [16] - *“The low rate of exit reflects the fact that many older farmers do not want to retire, not that they are unable to. Only about one third of farmers intend to retire completely.”*. Any exit scheme will therefore only reach some of the targeted population: as described above, a variety of measures has already allowed farmers to semi-retire without leaving the farm [19].

In farming, asset values can be extremely high, compared to returns, even in the case of tenanted farms. Combined with tax incentives, this results in a situation where for many, relatively low farm profits will translate into low pensions that need to be supplemented. In addition, the phenomenon of asset value accumulation makes transfers of farms difficult. [16][18]

There are also historical and cultural challenges for farmers leaving their farms, particularly farms that have been in a family for generations [16]. Considering their financial needs, those exiting farming often have to liquidate the business in order to realise the value of its assets. The farmland may be split into several lots to be rented or sold, in order to fetch a higher price or remain affordable to potential buyers. This is incompatible with further transmission of holdings to a new generation, and tends instead to result in increased farm amalgamation among neighbours. Even if the farm is tenanted it doesn't mean that it will necessarily be transferred intact.

Under the new scheme, the proposed payment for farmers to leave the farm, at around 2.35 times a reference level, is wide-ranging, much like the previous schemes for dairy and pig outgoers. It also enables farmers to benefit from the value of the land by renting it out.

- Any amount under £ 100,000 represents an incentive but it is unlikely that it will be sufficient, after farm liquidation, to fully support the farmer leaving the farm and setting up home elsewhere, as mentioned by [16].
- A £ 42,500 BPS payment already represents 183ha (for lowland) of farmed area, which is a sizeable area that would provide a higher 'retirement' payment if it were instead sold or rented out.
- According to annex C of the consultation, the median BPS payment is under £10,000. For such a recipient, the scheme would provide the farmer with approximately £23,500, which is only enough to buy a car, but clearly insufficient for a new tractor. [16]

When taking up the scheme all BPS rights would be cancelled for subsequent years. It is unclear how the scheme could be implemented in farming partnerships or enterprises with several family members: would only the potential retiree's share of the BPS payment be cancelled, or would the scheme only be offered for the whole holding? If only for the whole holding it seems less likely to be attractive to these kinds of farming model. For holdings with several family members working together in the business (2,3,4...) the only option where it would clearly be interesting for them to take up the scheme would be to obtain a lump sum to invest (eg in diversification...).

This scheme will mainly target sole-person holdings where decision making and financial liabilities are one person's responsibility. It will not be practical for bigger holdings with several family workers. For bigger holdings the share of the payment devoted to the retiree could be taken out from the farm payment. For some bigger holdings, there might be a one-off opportunity in order to access an investment package for the farm or other projects (inc. retirement).

*given the expected £100,000 lump sum payment cap

Setting up a plan to take over takes a long time

In figure 2 below, potential pathways are illustrated for planning a farming system, which is a long task unique to each farm, requiring a case by case approach to understand potential outputs based upon the specific mix of available resources. Taking over a farm, especially in a general climate of uncertainty since Brexit, is a major challenge and a major expense. Access to finance can be a significant barrier. As described in [19] – “*The difficulties associated with non-successional entry into UK farming cannot be examined in isolation from broader processes of change within the agricultural industry*”, and just such a broader view is needed to understand the challenges that explain the trickle of new-entrants into farming.

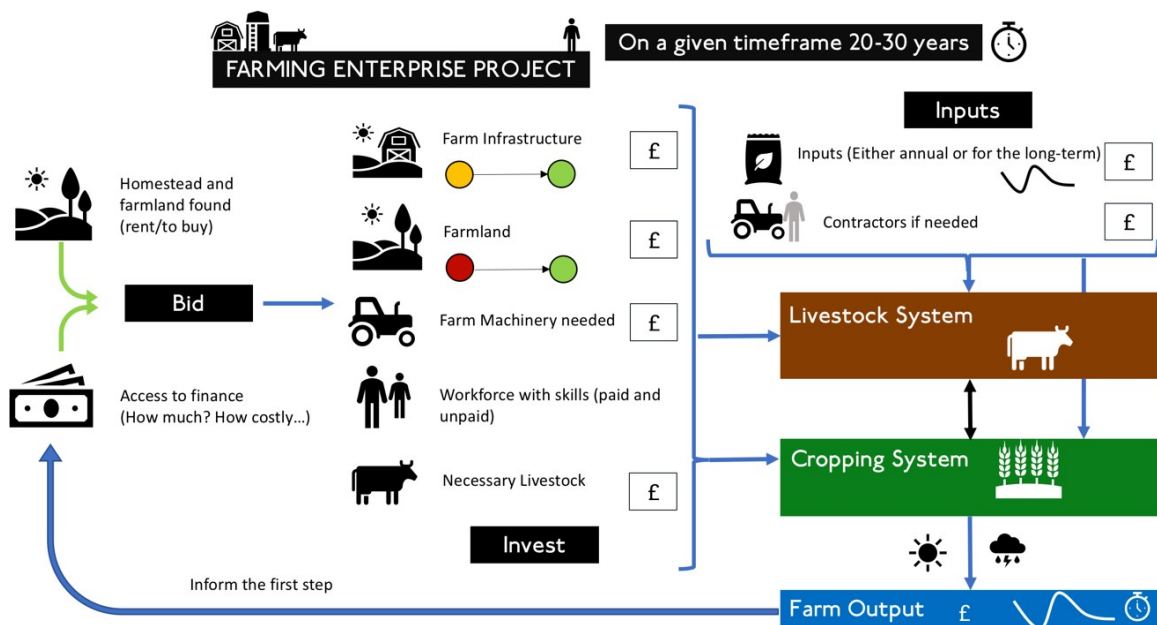
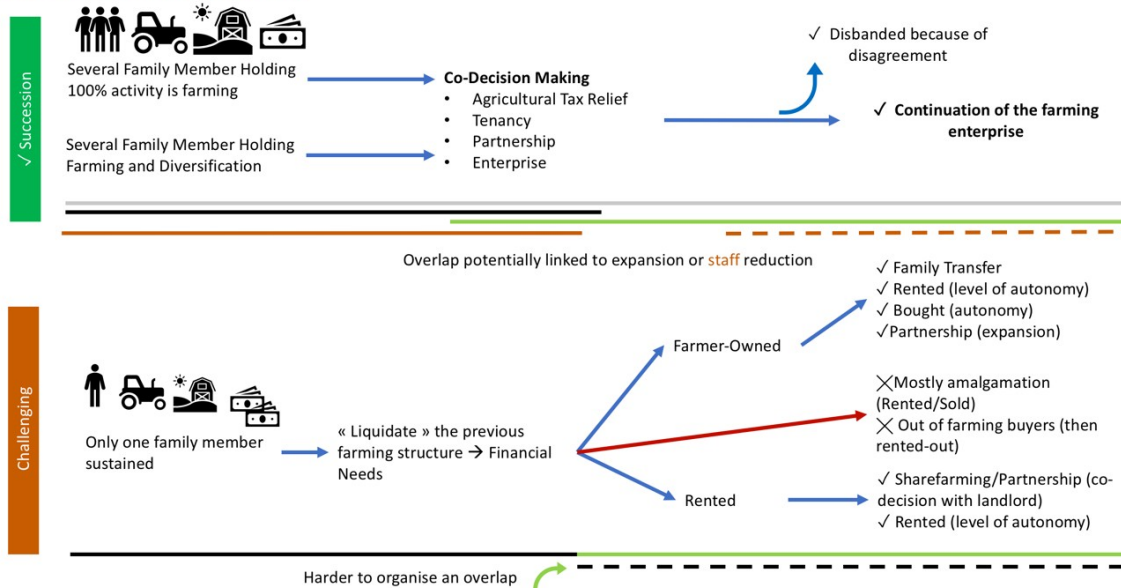


Figure 2: From the construction of the farming enterprise project to the new production system (Lenormand, 2021)

Succession and Vulnerability:



Existing Tool: Partnership, Sharefarming, Renting Agreement, Young Farmer Payments...

Figure 3: Succession, size of farms and vulnerability to amalgamation. The farms targeted by the scheme are in the second category; past and ongoing research ([11], [19],[16]) explain those pathways. By T. Lenormand.

Comparing pathways for different farm situations (figure 3) suggests that the problem of transmission reduces the likelihood of a handover on one-person holdings, compared to larger ones; thus effectively favouring expansion linked to transmission. [16]

In the consultation document, the scheme is due to start in 2022. Owner occupied farms taking up the scheme would have to sell or rent-out the land rapidly:

- it seems difficult to envisage full tenancies shorter than 10-15 years (FBT) if the whole farm is rented out, especially if the farm infrastructure needs investment. One of the barriers identified by new entrants was high rental prices, but so far nothing is planned to address this [16].
- This means that farms are likely to be rented out as land only, with retired farmers retaining some control over the land and continuing use of the farmhouse. Even a 5-year FBT gives some security to the tenant compared to an 11-month grazing agreement. [11]
- If a whole farm is put up for sale, prospective new entrants still have to negotiate the slow and costly process of starting farming operations.
- Non-agricultural buyers may outbid others, in order to subsequently rent-out the land. [16]

For any landowners taking back control of the land it is likely that most of it will be either sold or amalgamated. [19]

A diverse range of structures exists to bridge the succession gap: e.g. share farming; partnerships; contract farming; these options should be included in the list of possible routes to facilitate successful retirement. [20] Planning a “long” transition spanning 2-3 years would be easier to manage for most in the industry, given the number of actors and processes involved.

Note: We do not support the separation of common grazing rights from land holdings, as they represent a valuable forage resource for the holding which, if removed, effectively render the former holding structure inviable. If this proposition goes ahead it will effectively be signalling that there is no will among policy makers to ensure the successful transmission of such holdings.

Conclusion

The sensitive element of this exit payment is that it targets mostly “family operated small farms”. It is difficult not to see it leading inevitably to more amalgamation, rather than presenting any opportunities for new entrants. Due to the structure of the industry, its impact would be relatively limited. The payments offered are not particularly high, particularly for small farms. Even if only a relatively small proportion of farmers take up the scheme, given the “small” UK land market it will not meet unsatisfied demand [21]. Structural tools would be needed to accompany the farm, plus advice to help decide between amalgamation or farm transmission, for each applicant. A wide body of literature supports the view that further amalgamation leading to productivity gains will not lead to increased farm incomes [1].

A possible improvement would be to offer a higher payment geared to small farms, as their payments would be particularly modest, and maybe linked to a non-amalgamation condition. This could promote sustainable generational renewal in farming by improving the reward for the retiree.

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4. The surveys carried out by the CCRI gauging farmer sentiments towards ELM.

The CCRI has not undertaken any specific surveys to gauge farmer sentiments towards ELM. However, we have undertaken both survey work and regular liaison with a range of farmers and landowners in other contexts, during the period while ELMS has been developing, and it is from a mix of these that we were able to contribute some farmer feedback as part of our first written evidence submission. Specific sources of evidence were cited, in that earlier submission.

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