



The Exmoor Society response to the EFRA call for evidence on the future of uplands

About the Exmoor Society

The Exmoor Society was founded in 1958 to protect and promote Exmoor National Park. We are an independent charity and membership organisation. Our concern is the long-term future of Exmoor as a living, working landscape: a place of exceptional natural beauty, rich cultural heritage, farming tradition, wildlife, rivers, moorland, woodland, coast and communities.

Exmoor is not a wilderness. It is a farmed and inhabited National Park, shaped over centuries by grazing, commoning, woodland management, settlement, lanes, hedges, banks, farmsteads and local knowledge. Its future depends on policies that support both nature recovery and viable land-based livelihoods. Government must not treat food production, biodiversity, climate, water management, heritage, public access and community life as separate or competing silos. In a landscape such as Exmoor they are closely connected.

We welcome the approach taken in Dr Hilary Cottam's review, *Towards a flourishing uplands*, which recognises that the challenges facing the uplands are social, economic, environmental and cultural at the same time. Its central insight, that people, place and nature must be treated "on a par", is particularly important for Exmoor. The uplands will not flourish through a piecemeal or purely technical approach. They need long-term, place-based system change, designed with the people who live and work there.

The Exmoor Society's main points and asks of Government:

1. Recognise upland National Parks as priority areas delivering environmental goods while supporting the traditions, culture and landscape that led to their designation
 - National Park Management Plans should be used as the framework for delivering land use, nature recovery and farming policy in the uplands.

The Land Use Framework, the Environmental Improvement Plan, Local Nature Recovery Strategies and Environmental Land Management plans already bring together nature, farming, heritage, access, climate and community priorities. They should carry more practical weight in funding and delivery decisions.

2. Provide long-term certainty for upland farming.

The removal of direct payments has placed real pressure on extensive livestock systems, commons and marginal land. Many of these farms maintain the landscapes, habitats and traditions for which uplands are valued. Environmental payments must be reliable, long term and sufficient to support viable businesses, not just compensate for income foregone.

3. Support nature recovery with farmers, not instead of farmers.

Exmoor's landscape of moorland, commons, heathland, wood pasture and river valleys, has been shaped over centuries by extensive livestock farming. This farming culture is the mechanism by which the Exmoor landscape and its ecological value has been created and sustained. That said, Exmoor needs bigger, better and more connected habitats, restored peat, healthier rivers, more

trees in the right places, and more wildlife-rich land. But this must be done with farmers, commoners and landowners as partners.

Any policy framework that treats food production and nature recovery as competing priorities fundamentally misunderstands how Exmoor works. The Cottam Review found that across all upland areas, farmers and environmentalists believe environmental strategies are compatible with farming done in the right way and that the perceived civil war between the two is a failure of system design, not an irreconcilable conflict of values

So, land use change that displaces farmers, erodes traditional skills or concentrates environmental value in the hands of outside investors will not serve Exmoor's communities or its nature. Nature recovery will also fail if it is seen as something imposed on rural communities.

A just transition means keeping young people in farming, supporting local supply chains and the local food infrastructure - including abattoirs, vets and processing capacity - that underpin farm profitability and community resilience. The Cottam Review found that the absence of this infrastructure is already depressing farm incomes and accelerating rural decline, and that rebuilding it requires deliberate public investment that also includes investment in affordable rural housing, school viability and local services as without them, the people on whom Exmoor's landscape depends cannot remain.

The Exmoor Society asks Government to treat Exmoor's farming community not as an obstacle to environmental recovery, but as its most essential delivery partner and to design policy accordingly, from the ground up.

4. Ensure that upland communities benefit from change.

Environmental investment should create local jobs, support young entrants, strengthen local food and timber supply chains, protect traditional skills, and help keep communities viable. It should not lead to land speculation, loss of farming families, reduced local employment or environmental schemes whose value is extracted from the landscape by outside interests.

Response to the Committee's questions

1. Balancing competing demands in the uplands

Current policy recognises that uplands must deliver many outcomes, but it does not yet provide a stable or coherent route for doing so. On Exmoor, the same land may be producing food, holding carbon, storing water, supporting wildlife, protecting archaeology, shaping landscape character and providing public enjoyment. Policy needs to work with this complexity.

The key tension is not between farming and nature in principle. The key tension is between ambitious national targets and inadequate delivery mechanisms on the ground. Farmers are being asked to adapt quickly, often with uncertain income, changing rules and complex schemes. Meanwhile, the condition of protected habitats and rivers shows that the current system is not delivering enough for nature either.

The Cottam review rightly identifies that farming, environmental restoration, tourism, community life and homes are now in tension across the uplands. The answer is not to favour one interest over another, but to build a shared local vision in which people, place and nature are treated together. Exmoor needs a new relationship between Government, agencies, farmers, commoners and communities in which local people are not simply consulted and then ignored but are able to help shape decisions and see how their knowledge has changed policy.

The right approach is integrated land management. Some areas should be managed primarily as existing nature-rich habitats. Some should provide buffers and corridors. Some should remain in productive nature-friendly farming. Some may be suitable for more extensive restoration of natural processes. These decisions need to be made locally, transparently and with those who manage the land. Many nature rich habitats, including priority habitats, need carefully managed livestock to enhance their management where grazing (e.g. species rich grasslands), browsing (e.g. wood pasture), trampling (regenerative grazing, improving soil health), nutrients (addition of organic matter, and dung beetle habitat), and small scale creation of bare earth (solitary bee habitat) can add diversity, niche habitats, and improved ecological function.

Public access also needs proper management. Exmoor's open access, paths and recreational opportunities are a major public good, but they bring costs and pressures: livestock worrying, disturbance, unsightly infrastructure, erosion, litter, fire risk, parking and conflict with farming operations. Access should be supported by advice, infrastructure, education and, where necessary, funding for land managers. Tourism should be encouraged where it supports local businesses and public enjoyment, but low-value and high-pressure tourism should not be allowed to undermine the very communities and landscapes people come to see.

That said, there is significant remaining tension between the protection of cultural heritage and nature in upland landscapes. Academics have argued that we are witnessing a process of 'cultural severance' in the uplands and that the Commons, in particular, are under renewed pressures for what has been referred to as 'virtual enclosure' (whereby Commons holders lose their ability to exercise their rights on the Commons because it is rendered impossible by economic and policy restrictions). The Land Use Framework has identified the most significant moves away from food production in upland areas, in favour of more expansive nature recovery and climate mitigation land-uses. Options remain to balance these competing demands but we fear that, together, the current suite of policy signals point to a significant threat to the cultural heritage value of upland landscapes.

2. Impact of agricultural policy change

The transition away from direct payments has created serious uncertainty for upland farms. Extensive grazing systems are rarely highly profitable from food production alone, but they deliver many public goods that markets do not reward. On Exmoor, these systems maintain open moorland, traditional breeds, commoning, hedges, banks, pasture, wooded valleys and much of the landscape character that underpins tourism and local identity.

Where payments fall before replacement income is secure, there is a risk of business contraction, reduced confidence, less investment, land abandonment in some places and intensification in others. Neither outcome is good for Exmoor.

Because the uplands produce only 3% of the nation's calories come from upland farming it is commonly argued that uplands should be given over to nature recovery. But government should recognise that upland livestock farming is not only part of the wider system of red meat production it is also a landscape management system. Public support should be designed accordingly. This does not mean preserving every practice unchanged, but it does mean giving farmers a fair and realistic pathway to adapt.

The current system also risks reinforcing dependency and fear. Small farmers often feel they must wait to see what Defra wants before acting, while also fearing penalties if they get details wrong. Government should move away from short-term, constantly changing, highly prescriptive schemes and towards longer-term agreements, trusted local facilitation and outcome-focused management. Farmers should be enabled to become "system makers", not merely "system takers".

3. Environmental Land Management and Farming in Protected Landscapes

Build Environmental Land Management (ELM) around whole farms, whole landscapes and local relationships.

Upland farms often include a complex mix of in-bye land, moorland, woodland, rough grazing, commons, watercourses, historic features and designated sites. Schemes must be simple to enter, flexible enough to fit local conditions, and reward the full range of public goods: clean water, carbon storage, flood management, biodiversity, landscape character, heritage and access. They must also recognise that farmers innovate through trusted peer networks and local clusters, not simply through top-down advice.

ELM is essential, but it is not yet sufficiently joined up for upland National Parks. Countryside Stewardship Higher Tier, Sustainable Farming Incentive, Landscape Recovery and capital grants all have a role, but access can be difficult, advice can be limited, and the interaction between schemes is not always clear. The current system of scheme administration is causing uncertainty, lack of trust, gaps in funding, and hampering decision making. When schemes are open it becomes a boom-and-bust scenario with land managers accessing everything they can now, because they can't plan for the next opportunity, and considering wider landscape impacts takes a lower priority in their decision making. There are instances where instead of rotational hedge laying and coppicing across the farm area land managers are laying multiple contiguous hedges, creating a landscape 'clear fell' system.

Commons and tenanted land need particular attention. They are central to Exmoor's upland character, but collective decision-making, landlord consent, short tenancies and scheme complexity can make entry difficult. The Cottam review highlights the need to re-imagine commons, drawing on the best available knowledge about successful shared governance, rather than leaving commoners to navigate historic rights, changing regulation and environmental pressure without adequate support.

Currently common land is not eligible for ELM schemes due to the computer system and parcel sizes. This fails to protect and enhance high priority moorland and heathland habitats, which provide a range of ecosystem services including cultural benefits, historic features, carbon, water quality, and more. Heather moorlands are rare and declining habitats internationally. It also fails to acknowledge

the collaboration and facilitation undertake by the commoners to manage the land together, and the additional thought, time and energy that takes. Landscape Recovery and the Farming Collaboration Fund attempt to create facilitation, collaboration and holistic landscape management, which is already happening on a smaller scale on our commons. Brendon Commons Council on Exmoor was the first Commons Council to be formed in the country, making their collaboration a national first and an example to others. On Exmoor we have 4644.84 hectares of registered common land, the majority is moorland with a small area of woodland, equating to approximately 25% of Exmoor's moorland area.

3.b. Keep and strengthen the best features of Farming in Protected Landscapes.

FiPL has worked because it has been locally delivered, flexible, practical and trusted. It has allowed farmers and land managers to bring forward projects that suit their land and their business, while contributing to nature, climate, access and heritage. The capital grants it can offer provide bespoke opportunities to enhance nature and test ideas.

However, FiPL cannot replace long-term environmental management payments. Capital works are useful, but habitats, rivers, peatlands, hedges, wood pasture, commons and access routes need ongoing management. Upland policy must therefore combine capital investment, annual management payments, local advice and long-term agreements. These principles should be embedded in mainstream ELM, with longer-term revenue funding as well as capital grants.

In her Uplands report, Dr Hilary Cottam also found that current scheme design systematically favours large landowners, including estates with offshore tax registration, who can employ agents to navigate complex applications and absorb cashflow delays, while smaller farms are penalised by the very structures meant to support them. Higher Level Stewardship agreements should receive regular care and maintenance visits, but with many agreements now 15 years or more old, the majority of these visits have not occurred due to Natural England's decreased resource and fewer number of local advisers on the ground.

The Exmoor Society believes scheme eligibility and payment design should prioritise working farm businesses, with meaningful access for smaller-scale and family farms.

4. Legal protections and designations

National Park, SSSI, SAC and other designations are essential. They recognise public interest in landscapes and habitats of national and international importance. They should help guide investment and decision-making.

But designation alone does not secure good management. Many protected habitats depend on active grazing, cutting, burning or hydrological management. Farmers and land managers need clear locally tailored advice, timely consents and funding that makes the right management practical.

The strengthened duty on public bodies to seek to further National Park purposes is welcome, but it must be made real. Government departments, agencies, regulators, water companies, local authorities and infrastructure providers should be expected to act consistently with National Park Management Plans. Too often, protected landscape policy is strong in principle but weak in delivery.

Regulation should be firm where real environmental damage occurs, but it should not make the majority of responsible farmers feel permanently policed. Better use of transparent data and

technology could help enforce standards while freeing experienced people to support collaboration, advice and innovation.

5. Data, mapping, modelling and skills

Better data is needed at the scale at which decisions are actually made: the field, the holding, the common, the catchment and the landscape. Priorities include habitat condition, peat depth and condition, soil carbon, water quality, natural flood management opportunities, wildfire risk, tree planting suitability, historic environment constraints, access pressure and agri-environment scheme coverage.

This information must be usable by farmers and advisers, not just by specialists. Digital mapping has value, but it cannot replace local knowledge or face-to-face advice. The science used in decision-making should be accessible, current and open to scrutiny, particularly where decisions affect stocking levels, burning, tree planting, peat management, commons or the balance between farming and restoration.

Skills are also needed. Upland transition will require knowledge of whole-farm planning, grazing systems, soil health, peat restoration, woodland and wood pasture management, river restoration, natural flood management, heritage-sensitive land management, carbon and biodiversity markets, business planning and visitor management. Peer-to-peer learning, demonstration farms, placements and farmer-led learning networks are likely to be more effective than remote guidance alone. The Exmoor Hill Farming Network provides an example of a local network providing peer to peer learning, training, tackling rural isolation, providing social opportunities, and enabling farmers to leave the farm. Invest in trusted local advisers and facilitators who understand both farm businesses and environmental outcomes and guide scheme uptake. Public money should support horizontal networks in place, allowing for ongoing support and advice, not only vertical systems of inspection, regulation and control facilitation, data and monitoring.

6. Impact on rural communities

Land use change will affect rural communities profoundly. On Exmoor, farming and land management support local identity, local employment, traditional skills, tourism, local food, landscape character and community life. Changes in stocking levels, land ownership, environmental markets or farm viability will therefore affect much more than the individual farm business.

There are opportunities. Nature recovery, river restoration, peatland work, woodland management, local food, access improvements and heritage conservation can create jobs and strengthen pride in place. But there are also risks. Poorly designed policy could accelerate the loss of active farmers, weaken commoning, reduce traditional skills, encourage speculative land purchase, or create environmental projects with little local benefit.

The Cottam review is right to warn against an “industrialised environmentalism” in which financialised nature schemes or large-scale land-use change displace tenants, remove farming families and extract value from the landscape. Carbon, biodiversity and water markets may have a role, but they must be designed with safeguards for local people, landscape character, food production, heritage and long-term public benefit.

A just transition must keep people in the landscape. It must support young farmers and land managers, affordable housing, training, local processing, local supply chains and businesses rooted in the place.

There is also a need to support new entrants and the next generation of farmers. Access to land, tenancies, housing, finance and networks is often extremely difficult. A flourishing uplands will require mechanisms to help capable new entrants and younger local people gain access to land and build viable businesses.

7. How Government can ensure upland communities benefit

Government should treat upland Protected Landscapes as places where national environmental ambitions can be delivered in ways that also sustain rural communities. This requires long-term funding, trusted local delivery and proper involvement of farmers, commoners, landowners, conservation bodies, local businesses and residents.

Specific measures should include:

- long-term ELM agreements suited to upland farms and commons
- better access to Higher Tier schemes and Landscape Recovery for complex upland systems
- payment rates that reflect the full public value of upland land management
- continued local delivery through National Parks and trusted advisers
- support for farm clusters, commoners' associations and catchment-scale collaboration
- public and private nature finance with safeguards for landscape, heritage and local benefit
- support for new entrants, succession and younger farmers
- investment in local food, timber, venison, abattoirs and other land-based supply chains
- training, placements and apprenticeships in upland land management
- support for affordable rural housing and essential rural services
- encouragement of repair, re-use, shared equipment and local trades
- proper funding for access management and visitor pressure
- clear monitoring of whether nature, water, climate and community outcomes are actually improving

Local food infrastructure is particularly important. Upland farming cannot flourish if farmers are dependent on distant, low-margin, industrial supply chains. Local abattoirs, butchers, dairies, markets, public procurement, schools, hospitality and direct sales can all help keep more value in the local economy. Government should treat food security as a regional and community issue, not only a question of supermarket price and global supply.

Housing and basic services must also be part of upland policy. Without affordable homes, schools, childcare, health care, broadband, transport, meeting places and rural trades, there can be no thriving upland economy. Environmental recovery cannot be separated from the social infrastructure that allows people to live and work in these landscapes.

Conclusion

Exmoor's future depends on a balanced approach. The Society supports ambitious nature recovery, cleaner rivers, peat restoration, climate resilience and better public access. But these aims will only succeed if they are built around viable farm businesses, active commoning, local knowledge, cultural heritage and strong rural communities.

The uplands are living landscapes and should not be treated as empty spaces available for national targets. Government policy should reward the people who manage them, support them through change, and above all that environmental recovery strengthens rather than displaces the communities that have shaped these landscapes over generations.