

# **CL701 CARNYORTH DOWNS (Common)**

## **MANAGEMENT REVIEW CONSULTATION**

Written evidence submitted by Save Penwith Moors to  
Antony Richards Property Services  
10 Market Place, Penzance, TR18 2JA  
acting on behalf of Mr Trembath, the applicant to Natural England  
for a Higher Tier Countryside Stewardship agreement

01 In early 2007 a Farm Environmental Plan stated that this Common was in “good” condition and only needed to be maintained,<sup>1</sup> a situation resulting from decades of the Common being left to fend for itself. Yet about a year later, under the Natural England led HEATH Project, the area was enclosed with new stock proofing – barbed wire fences, gates and a cattle grid – in preparation for the introduction of grazing cattle under a Higher Level Stewardship agreement.

02 In principle Save Penwith Moors have always been against the enclosure and grazing of Carnyorth Common which is a very popular local and tourist recreational area containing a large number of important archaeological sites – both scheduled and unscheduled.

03 We stand by the St Just Town Council vote on 29th September 2008: “Whilst acknowledging the need for some form of management of Kenidjack Common [aka Carnyorth Common], the Town Council feels that the proposals as put forward by the Heath Project, particularly regarding the erection of fencing, stiles and gates, will have an adverse effect on access and tourism. (8 in favour, 2 against, 1 abstention).”<sup>2</sup>

04 This prediction has proved to be correct and, therefore, we are still fundamentally opposed to any new form of agri-environmental schemes on this Common that includes grazing stock with attendant stock proofing infrastructure. We consider any maintenance of the Common should be done by manual means – cutting and controlled burning, and that all stock proofing infrastructure installed under the HEATH Project during 2008/2009 be permanently removed to improve visual appearance and physical access to this once open and safe environment.

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<sup>1</sup> Farm Environmental Plan March 2007 & Farming Wildlife Advisory Group report of February 2007

<sup>2</sup> <http://www.stjust.org/stjusttc/wp-content/uploads/2013/12/2008-sept-29-mins.pdf>

05 We note a payment of £274 per hectare will be made for management of lowland heathland (LH1) – a very generous 37% increase over the previous Higher Level Stewardship payment for maintenance of lowland heathland [HO1] that had a total cost for this Common of well over £200,000. During these times of austerity, when public services are being drastically cut back and wages restricted to a very small percentage annual increase, we consider this not to be in the public interest.

06 Also note that prior to HLS in 2008, the expanses of ungrazed moorland acted as an effective barrier to livestock diseases spreading from one farm to another, such as bovine TB. Grazing the moor would – once again – bridge that gap. Nevertheless, should the new Countryside Stewardship agreement proceed then we would like the following points to be actioned.

## ACCESS

07 It has been apparent over the past decade that, largely because of the presence of cattle and their unpredictable behaviour, as well as the poor installation of many gates, there has been a very definite reduction in visitor numbers – both on foot and on horseback. There are still reports of gates being awkward and/or dangerous for horse riders to use – this is clearly unacceptable after so many years, especially now that this Common is registered and horse riders have a legal right to use it as being within the former Urban District of St Just. Therefore, all gates must be made safe and easy for horse riders and pedestrians to use, and repairs made to gates still in an unacceptable condition.

08 In exceptional wet weather cattle should be removed from the Common to prevent potential damage to paths and tracks so as not to inconvenience other users. In addition, the use of 4x4 vehicles following the hunt [surely both these activities are unlawful] on this Common should be prohibited.

09 Although an area of open access land, all public rights of way crossing the Common should – due to Cornwall Council financial cut-backs – be cleared and kept free of vegetation by the agreement holder.

10 We welcome the suggestions that gates are tied back when these are not required to secure livestock, and that permanent signs on access gates will be installed stating: “Cattle graze this common between May and September” [but see comment below #13]. It should also be noted that the small green reversible gate signs, intended to be turned around to show the public when cattle are off the Common, have never been reversed by the HLS agreement holder during the lifetime of the agreement.

11 We are also pleased that no changes are proposed to the existing stock fencing, cattle grid, water troughs, access gates and stiles on the common, and note that scrub/bramble and bracken will be managed as required and existing fire breaks will be maintained. However, to benefit the appearance of this Common we ask that old ruinous 1980s wooden stiles and decayed fencing on the western side (Truthwall Common) be removed without delay.

## GRAZING

12 We welcome the decision to use a group of 10-14 Red Poll cattle instead of the larger Longhorns, and note that no bulls or cows with calves at foot will graze the common. Also that the new cattle do not have horns; are generally calm – allegedly – towards people but may be inquisitive and are, apparently, an ideal breed for grazing on public access sites. Nevertheless, it is vital that cattle are prevented from impacting on archaeology in a destructive way – especially Tregeseal Stone Circle and the group of Holed Stones – as happened on numerous occasions during the HLS agreement.

13 We consider that, although it is suggested that alteration of the grazing calendar be made to reduce conflict with public recreation, the annual grazing period coincides with several Bank Holidays as well as the school summer holidays – all busy tourist periods when people like to visit this Common and its antiquities. We think this is incompatible with the intended grazing period of May to September and is another reason why this agreement should be made cattle free.

## AUDIT

14 The introductory letter to all stakeholders from Antony Richards Property Services (Penzance) makes the statement that: “Over the last ten years Carnyorth Downs [sic] has been subject to a management agreement and is now regarded as one of the best managed areas of open space locally, if not nationally.” Since Natural England do not intend to carry out any audit – independent or otherwise – to determine whether the ‘Indicators of Success’ have been achieved over the past 10 year lifetime of this HLS agreement, it is difficult to understand how such an unsubstantiated statement can seriously be made.

15 One has only to look at this moor today to see the totally un-natural, chequered effect of the man-made contribution, over recent years, to this once unspoilt natural environment. Mechanical firebreak cutting and ‘controlled’ burning are the sole visual changes to the moor as it was pre-grazing in 2008. The grazing hasn't made the slightest difference to "scrub" and hasn't touched the bracken areas, both stated aims of reduction through grazing. The "Sea of Heather" is vastly reduced, and there is anecdotal evidence that skylarks are noticeably declining. Carnyorth Common has deteriorated under the "care" of HLS. Grazing has totally failed to live up to its expectations.

16 Despite the halving of Defra's budget between 2010 and 2020 and a corresponding reduction of the budget for Natural England that has affected staffing levels, we propose that, when the agreement comes to an end, an independent audit be carried out to determine whether the agreement has been successful – or otherwise – and if it has represented public good for public money, and whether such very expensive countryside agri-agreements are in the national interest.

## TO SUMMARISE

We oppose the introduction of a new Countryside Stewardship agreement for the following reasons:

1. The Common was in a 'good' condition after being left alone for decades.
2. The cost of a new agreement is prohibitive in this period of severe austerity.
3. The Common is a prime local recreational amenity and popular tourist destination.
4. The grazing calendar coincides with the tourist season when any breed of cattle has the potential to put people off from accessing this Common, especially those with dogs or young children.
5. There is the potential for cattle to damage archaeological sites.

30th September 2017

[See responses to the consultation](#)