

## CARNYORTH CONSULTATION FOLLOW ON.

Following on from the consultation submission and draft details of the new Countryside Stewardship agreement, SPM send a list of 3 issues to Natural England. For original details of #9, #11 and #16 see in the consultation submission.

19th December 2017 SPM to NE;

12th January 2018 NE to SPM;

12th January 2018 SPM to NE

(#9) There is no mention of the agreement holder keeping public rights of way clear.

There is a legal requirement for public rights of way to not be blocked, and the maintenance of a public right of way is the responsibility of the Local Authority. The maintenance of public rights of way across the common is therefore not a requirement of a Higher Tier agreement holder.

(#9) As someone who has been involved with public rights of way issues over the past 40 years I am well aware that responsibility for their maintenance lies with the Local Authority. My point is that, in these times of extreme financial austerity when the Council is unable to fulfil its legal obligations, it would be a good practical way of helping local communities and the tourist industry – as well as an excellent PR exercise – for those in the farming community receiving public money to maintain public rights of way on their land.

(#11) No mention of the removal of old ruinous 1980s wooden stiles and decayed fencing.

The removal of the old ruinous wooden stiles and decayed fencing is not a requirement of the Higher Tier agreement. However, Mr Trembath has offered to discuss this matter with Natural England and with Historic England, over the scheduled area of the common, to see if removal could be possible without disturbing the ground and the underlying archaeology.

(#11) Presumably, those ruinous wooden stiles and fencing not on a scheduled area will remain in place for evermore as a lasting eyesore.

(#16) No mention of any independent audit once the agreement comes to an end.

I would be grateful if you would tell me why these important issues have not, apparently, been considered since, in my opinion, they represent classic examples of the beneficial use of public money for public good.

Natural England do not have plans to carry out an independent audit of the agreement once the agreement comes to an end. Delivery of the agreement will be monitored through agreement after-care visits to ensure that positive environmental management is taking place on the common. In addition, the agreement may be subject to Rural Payment Agency inspections

(#16) Self-monitoring, rather than a final independent audit, would, I suggest, not give an accurate and unbiased view of success or failure of an agreement and the benefit for providing 'public money for public good'. Finally, may I suggest that the three issues detailed above are made a requirement of the Higher Tier agreement in this particular case.