

Place Scrutiny Committee

Agriculture Task Group

January 2017

1. Recommendations

The Task Group asks the Place Scrutiny Committee and Cabinet to endorse and action the recommendations below and to receive a progress update in 6 months' time.

	Recommendation	How?	Who?
1	Farmers need to have greater clarity over what will happen to farm subsidies post Brexit, so that they can plan for the future of their business.	During the first half on 2017, the UK government should provide farmers with a clearer idea of what subsidy/support payments will be available to them after 2020.	UK Government
2	Farmers need to get a fair and consistent price for their produce, so that they can plan for the future, invest in their business and grow their industry.	The UK government needs to negotiate provision within world trade for permitted subsidies and marketing boards, which will support profitability to the point of national self-sufficiency.	UK Government
3	Post Brexit, the UK government needs to support and promote positive farming practices, which will push the industry to innovate and thrive, increasing food security and self-sufficiency.	The creation of a system of financial support which supports and promotes innovations in farming, diversification, practical environmental stewardship and increased productivity in areas such as fruit and vegetables.	UK Government
4	Agri-environment schemes need to be fit for purpose, practical and attractive to farmers, balancing farming needs alongside environmental outcomes.	When environmental/countryside stewardship schemes are reviewed, DEFRA and Natural England need to draw more greatly on the experiences and knowledge of those who live and work in agriculture and in the countryside.	DEFRA and Natural England
5	Young farmers and new entrants need support to fund the necessary upfront capital investment in stock, machinery and other expenses needed to begin their farm business.	Government should provide young farmers and new entrants with financial support through the introduction of cheap, long term loans, tax breaks and capital allowances.	UK Government
6	Affordable and flexible rural housing must be made available, to make living and working in the countryside	(a) Planning policies should make allowances for the building of either a retirement home or affordable housing (targeted at those working I agriculture	UK Government,

	viable for young people, and to support agricultural succession and retirement.	and related industries), allowing the older generation the option of a gradual move into retirement and to facilitate succession and other options for young farmers such as farm sharing; (b) Devon's Local Planning Authorities should make greater use of the national Rural Exception Site policy, which provides flexibility within the planning system to allow housing to be delivered in response to clear local need.	Devon District Councils & Dartmoor & Exmoor National Park Authorities
7	A greater public understanding of farming, food production and the contribution of agriculture to the economy, tourism and the wider public benefit needs to be established in Devon.	(a) The County Council to promote the wider public benefit of farming, and to take a greater role in the promotion of local food; (b) The County Council to make informative talks and/or farm visits available to officers and members, in partnership with the NFU; (c) The County Council to encourage and support Devon schools to organise farm visits for pupils.	Devon County Council Economy Communications and Education Teams & the NFU

2. Background

Agriculture in Devon

2.2 Farming in Devon is predominantly livestock based. Due to Devon's comparatively high yield grasslands, the dairy, beef and sheep sectors are particularly prominent. Devon also has a high number of small and family farms compared to the UK as a whole. There are a number of tenanted farms in Devon, with some large agricultural estates including the Duchy of Cornwall Estate and Clinton Devon Estates, however there are also a higher number of owner/occupier farms in Devon than there are nationally.

2.3 Agriculture is an important part of Devon's economy. Although only contributing around 2-3% of Devon's overall GVA, agriculture provides the basis for other key industries, including food manufacturing and tourism.

2.4 Agriculture also plays an important role in countryside guardianship and management, maintaining the character and landscape of the countryside, and particularly in the case of uplands, making it accessible for local people and visitors.

2.5 For a rural county such as Devon, farming has always been an integral part of rural community life, providing social networks as well as local employment. Farmers have traditionally had a strong role in their community, taking on roles with Parish Councils, volunteering to remove fallen trees and clearing rural lanes.

2.6 For many Devon farmers, farming is a way of life as well as their home and business. There is a strong emotional and psychological tie between the farmer and their farm, and this adds additional complexities to the widespread challenges currently facing the agriculture industry.

Scope of the Review

2.7 At their meeting on 7th March 2016, the Place Scrutiny Committee elected to undertake a Task Group review of Devon's agriculture industry. The scope of the review was to:

- establish the current challenges faced by the County's agriculture sector and the impact that this has on the rural economy in Devon as a whole;
- identify ways in which the County Council, partners and central government can help support, sustain and develop the industry.

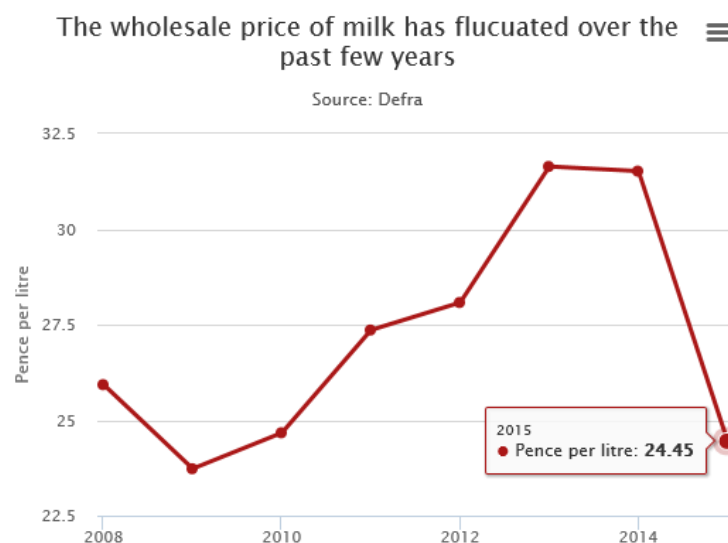
2.8 Time and resources necessitate that this report provides a snapshot approach to highlight some of the most significant issues affecting farming in Devon today. The challenges facing Devon's farmers are complex and intrinsically linked to world markets, cultural change and national and EU policy, among many other influences. In this vein the Task Group's recommendations do not profess to solve all the problems currently being faced by the agriculture industry, but instead ask central government and the County Council to stand up for agriculture and to support Devon's rural communities and farmers into a sustainable future.

3. Findings

3.1 The Task Group spoke to a wide range of agricultural industry experts, farmers and witnesses from related fields and identified a number of issues currently affecting the agriculture industry in Devon.

Low Produce Prices

3.2 The worldwide flooding of milk markets has meant that the dairy industry in the UK has suffered from low milk prices for a number of years. The below graph shows the trend in average milk prices since 2008.



3.3 Some dairy farmers have secured profitable contracts with large dairies and retailers, who will pay above the market price for milk to secure their supply chain. However this is not an option for all dairy farmers, particularly for isolated farms where the cost of collection makes this untenable. It is estimated that currently 75% of farms not operating on an aligned dairy contract are operating at a loss because it is costing them more to produce their milk than they are able to sell it for¹.

The **Milk Marketing Board** (established in 1933 and fully dissolved in 2002) controlled milk production and distribution and **guaranteed a minimum price** for milk producers.

3.4 Low produce prices are reflected across other farming sectors, particularly for beef and sheep. Lamb prices have been affected by the cheap imports from New Zealand, whilst imported beef from Ireland and South America is pushing down UK beef prices.

The Basic Payment Scheme

3.5 The Basic Payment Scheme (BPS) (previously the Single Payment Scheme) is a subsidy funded by the European Union to farmers, based on the amount of land they own or manage. The land has to meet certain criteria; the key principle being that the land must be kept in good agricultural and environmental condition. The scheme forms part of the European Union's Common Agricultural Policy.

3.6 The scheme itself has come under a lot of criticism, as it allows landowners to claim the payment without necessarily farming. Many in the industry also consider that due the universal way that the BPS is calculated (at a set rate per ha/acre irrespective of holding size, land quality or output), the scheme does not direct subsidies to where they are really needed. It also means that farmland now comes with an inherent income value, which is an additional driver for farms to expand, and is likely to have influenced the ever increasing price of rural land.

Agri-environment Schemes

3.7 Many farmers consider managing of the countryside and protection of the environment to be an integral part of agriculture. Agri-environment schemes in the UK have existed in a number of guises and aim to promote environmentally balanced land management by providing financial incentives. The current Countryside Stewardship Scheme launched in 2014 offers a Mid Tier level and a Higher Tier level, along with capital grants². The relatively new scheme is competitive and has not seen a wide take up, particularly in terms of the Mid Tier level, which many farmers do not consider offers them enough incentive to undertake the requirements of the scheme, though the capital grants are welcome. Those farming on Dartmoor and Exmoor particularly feel that the scheme does not offer anything of benefit for the moorland farmer. There is a general feeling from farmers and from within the agricultural industry that recent agri-environment schemes lack the insight and understanding of agriculture and the countryside to make them successful, and are created

¹ <http://www.telegraph.co.uk/business/2016/02/21/thousands-of-dairy-farms-face-closure-as-debts-reach-crisis-level/>

² <https://www.gov.uk/government/collections/countryside-stewardship-get-paid-for-environmental-land-management>

to meet the wants of environmental organisations, rather than a balance between environmental and agricultural priorities.

Profitability of Agriculture in Devon

3.8 The BPS in particular is relied upon by a number of farmers to keep their businesses operating and Devon farmers tend to have a higher dependency on BPS than farmers in south east England. For Devon's upland farmers, the BPS makes up around 50% of their income, whereas small mixed farms rely even more heavily on agri-environmental payments and many see over 100% of their farm income from the BPS³. Many farming families subsidise the farm's income by one or more family members taking on full or part time work. There is a risk that an 'unintended consequence' of the BPS will be that it has sustained inefficient farms, which without the subsidy would have either stopped operating or would have been forced to make greater efficiencies.

3.9 Without the BPS many farms would not be making a profit, indeed many are operating at a loss. Other than low produce prices there are a number of other contributory factors. The financial impact of TB (outlined in more detail below) will hit beef and dairy farmers who are teetering on the brink of survival particularly hard. Feed costs are also currently high; some farms are able to grow their own protein but almost all will need to purchase some soya protein from the US, which has become even more costly (albeit temporarily) as the pound falls against the dollar. The big five supermarkets enjoy oligopoly power through control of about 70% of the UK grocery market and farmers are largely price takers. An increased use of genetically modified (GM) animal feed could ease costs, with GM crops reputed to benefit from higher yields as well as better resistance to disease and pests. However GM technology is still unpopular with the consumer and there is a mixed view on GM within the farming population.

The **Farming Community Network (FCN)** offers confidential support to farmers with business, farm, family and health issues. **Financial** problems make up a high proportion of issues seen by the Devon branch of the FCN, but they are also seeing farmers struggling with a number of other issues including **family relationships**, **mental health** (which has seen a significant increase) and **retirement and succession** (which is notably higher in Devon than the national trend).

3.10 Farmers also feel pressure to expand their farms so that they can benefit from greater economies of scale, however land prices are high, often artificially inflated, and land appears on the rental market so rarely that it can be let for more than its income potential. There is also an identified skills deficit amongst farmers. Traditionally farming has required good technical skills in land management, animal husbandry and crop production, but the modern farmer needs to be a business person, have strong financial, management and market knowledge. Many farmers do not recognise this shift or the value in developing skills in these areas.

3.11 Arguably, these challenges will be felt more by the small or family farm, and being the most common type of farm in Devon, will be particularly felt by Devon's farmers. The small farm has less margin for error, a weaker negotiating position, relies more on the health and

³ <http://www.princescountrysidefund.org.uk/downloads/research/is-there-a-future-for-the-small-family-farm-in-the-uk-report.pdf>, p6

skill base of one or two individuals and has an emotional tie to its purpose and place. However there is no evidence to suggest that size is the determining factor in the success and profitability of a farm. A number of other factors are at play, including strong business skills as already outlined, flexibility, successful engagement in agri-environment schemes, and the likelihood of a successor being in place⁴. The family farm that has provided the social fabric of the countryside and the bedrock of farming in the UK for centuries requires support to survive. The attention to detail, long hours and personal oversight that the small farmer invests in their livestock and land are a much undervalued asset of the nation.

Bovine TB

3.12 Bovine TB has had a devastating impact on beef and dairy farmers in Devon. The financial impact of an outbreak is significant; DEFRA figures indicating that the estimated average cost of a TB outbreak on a farm is £34,000. Farmers are compensated by government for the cost of the livestock lost, but are still left with other costs including the impact of the loss of animals, TB testing and business disruption due to movement restrictions, which totals around £14,000 on average⁵. Many farmers also report that the compensation paid does not accurately reflect the cost of the loss of the animal, not taking into account factors such as whether they are in calf, the loss of milk production and whether the animal is from an organic, pedigree or commercial herd.

3.13 As well as the financial impact, a TB outbreak can have a significant emotional effect on farmers and their families. News of an outbreak causes a great amount of stress and worry for many farmers and can lead to physical and mental ill-health⁶. Many farmers also report feelings of hopelessness and having no control over their situation. There have also been a number of serious physical injuries to farmers and helpers carrying out the tests.

3.14 Farms without TB but still in high risk areas, such as Devon, are still affected through the cost and disruption of testing and animal movement restrictions, as well as the impact of the constant worry of an outbreak occurring on the farm.

3.15 The UK Government's TB eradication strategy⁷ aims to achieve Officially Bovine Tuberculosis Free status for England by 2038 using a number of measures to control the disease, including badger culling, enhanced cattle surveillance and tighter TB herd management measures and use of badger and cattle vaccinations in high risk areas.

Rural Communities and Affordable Housing

3.16 Rural communities have undergone a considerable change over recent decades. There has been a steep rise in land and house prices and an increase in second home ownership; due to advances in technology, agriculture has become more mechanical and therefore offers less employment; there are less young people and families living in the countryside, and shops, pubs and schools have reduced in number. Many people living in the countryside also report a decline in the sense of community.

⁴ <http://www.princescountrysidefund.org.uk/downloads/research/is-there-a-future-for-the-small-family-farm-in-the-uk-executive-summary.pdf>, p6

⁵ <http://www.tbfreeengland.co.uk/faqs/>

⁶ <http://www.tbfreeengland.co.uk/assets/4200>

⁷ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/300447/pb14088-bovine-tb-strategy-140328.pdf

3.17 There are intrinsic links between all of these issues, but in particular, the lack of affordable housing in rural Devon means that many young people are moving away from the countryside which is impacting on both the rural economy and community life. The agriculture industry needs young farmers, but also local mechanics, engineers, seasonal farm workers, vets and food manufactures in order to prosper.

Age and Succession

3.18 Nationally, agriculture has an aging workforce. In 2013, the median age for a farmer was 59, and 34% of farmers were aged over 65⁸. There is much anecdotal evidence of farmers well into their eighties still 'holding the cheque book', with their children (in their fifties and sixties) being side lined. Lack of succession planning and other problems associated with succession are key factors in the number of farmers working well beyond retirement age. Succession is an extremely complex issue, composing of a number of intertwined factors, but it is particularly relevant in Devon where there are significant numbers of family farms.

3.19 Succession has a number of financial implications, requiring the transfer of land and other assets, as well as tax implications, and the process requires detailed planning and the provision of legal, financial and valuation advice. There is also the issue of housing. For tenant farmers, many of the older generation find themselves reaching retirement age without the capital to buy a home of their own, or able to afford private rents, and can feel trapped on the farm.

3.20 The impact of the emotional connection that farmers have with their farm and their community should also not be understated. The farm is after all their home as well as their business, and many have spent a large part of the life investing in it. Some farmers will have never lived or worked anywhere else and the prospect of moving away from their world extremely daunting, and can invoke feelings of fear and loss of control.

3.21 As well as the Professions of Law, Accountancy and Surveying, there are specialist organisations available which aim to support farming families through this transition, including the Farming Community Network (FCN) who can offer assistance in succession planning. FCN also offer a mediation service for families who need additional support to settle conflicts. Solutions are sought where both generations can feel valued.

The Next Generation

3.22 There is still an enthusiasm to farm among Devon's young people, and there has been a notable rise in the number daughters of farming families entering the industry.

3.23 In terms of agricultural training and professional development, Bicton and Duchy Colleges offer a number of further education courses and qualifications, and both have seen a recent increase in the uptake of their agricultural courses, with over 500 apprentices currently working and studying across the South West. Duchy College offers some degree level qualifications in agriculture and related fields, but many young people looking to study at this level opt for prestigious agricultural universities outside of the South West.

⁸ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/557993/AUK-2015-05oct16.pdf

3.24 There are a number of challenges facing young farmers. Access to land is a key issue. As already outlined, land values are high and tenancy opportunities are rare; those that do come onto the market tend to have high rents and short tenures. Devon County Council Farms Estate offers starter farm tenancies ranging from 37 to 301 acres and provides a good opportunity for young farmers and new entrants. However, tenancies are very competitive, and whilst this reflects well on the quality of would be new and young farmers in Devon, it also highlights the high demand for land.

3.25 As an industry, farming tends to be very capital intensive, with relatively low rates of return. A new farm business requires a large upfront injection of capital, to fund the purchase of livestock, farm machinery and other start-up costs. The majority of young farmers will need to fund this through bank loans, often unsecured, which can be difficult to obtain. The Enterprise Finance Guarantee⁹, a government scheme, encourages lending to viable businesses with inadequate security by providing a partial government backed guarantee, and can be a viable option for some young farmers, although some restrictions apply for agricultural lending. Other financial assistance is available for young farmers through the Young Farmer Basic Payment Scheme top up, which equates to an additional 25% of the basic payment for each of the first five years of the operation of their business¹⁰.

3.26 Options for those unable to obtain a tenancy are limited in Devon; some will look for farm or herd manager jobs on larger farms, but the majority of these opportunities tend to be outside of the South West. Another option for those without land is share farming, where a farmer, usually approaching retirement age, agrees to share their farm with a younger farmer, who is looking for land. The exact arrangements will differ depending on circumstances, and the success of the arrangement relies heavily on co-operation, mutual trust and profitability.

3.27 Many young farmers have experienced first-hand the challenges faced by farming families. Because so many have seen the financial strain and reliance on the Basic Payment Scheme experienced by their parents, those that want to pursue agriculture are often even more motivated to strive to run a profitable farm business.

Innovation and Diversification

3.28 In previous years, an element of mixed farming would protect farmers against periods of low milk and meat prices, but with cereal prices also suffering, this no longer provides the same security. Farmers today are having to look at more innovative ways of supporting their farm business and it is estimated that up to 50% of farms in Devon have diversified to some extent.

3.29 Devon is popular with visitors and a number of farms have capitalised on this, providing self-catering cottages, bed and breakfast accommodation, glamping and camping, which can provide a regular income, subsidising the farm through difficult periods.

3.30 There is also a wide range of examples in Devon of innovative diversification into specialist farming and food production. Many examples can be seen on the County Council's own farms estate, and have been recognised at the Devon Farm Business Awards. This includes a premium quail and duck egg farm, asparagus, cider, the

⁹ <http://british-business-bank.co.uk/ourpartners/enterprise-finance-guarantee/>

¹⁰ <https://www.nfuonline.com/assets/19573>

production of ice cream, an on farm poultry abattoir and a butchery, cutting and refrigeration unit¹¹. These farmers have been able to identify a gap in the market, have found a way of adding value to their original product and/or are retailing products direct to the consumer.

3.31 This kind of innovative diversification requires an additional skills set to that of the traditional farmer. On top of technical know how, these farmers need to have strong business skills and market knowledge, they need to be flexible, open to change and willing to take calculated risks. There are other factors which will affect a farmers' ability to diversify as well, including the location and accessibility of the farm, broadband speeds and access to capital. Not all farmers will have the skills, resources or inclination to diversify into another area.

3.32 There are few examples of diversification in to horticulture, and where this is seen it tends to be focus on specialist vegetables. Horticulture is labour and resource intensive, requires higher quality land than farming livestock, has high start up costs and has a competitive global market, which does not make it the obvious choice for diversification. However, the UK imports considerably more fruit and vegetables from the European Union than any other agricultural product, as well as large exotic fruit imports from South and Central America. There will clearly always be a need to import exotic fruits from abroad, however there is an opportunity for the UK to increase its production and self sufficiency of many fruits and vegetables.

3.33 Devon also has an opportunity to add value through regionalisation of the beverage and culinary experience and through the marketing of 'regional brands' including Red Ruby Devon Cattle, Devon Closewool Sheep, Devon & Cornwall Longwool, White Faced and Grey Face Dartmoor Sheep, South Devon Sheep and Exmoor Horn Sheep.

Public Understanding

3.34 The way that we buy and consume food has changed dramatically over recent decades. Food miles and the distance between abattoirs and markets have increased (whilst the number of facilities has decreased), supermarkets have grown and ready meals and processed foods are more readily available then ever. Today consumers feel distanced from, and understand less about the origins of their food and the industry that produces it. Devon is a rural county, with over 50% of its population living in the countryside¹². However, even here, many residents have a limited interface with farming. There is a feeling within the agricultural community that there is a lack of understanding by the general public of the challenges faced by farmers as well as the contribution they make to the local economy, the environment and the preservation of the landscape.

Brexit

3.35 On the 23rd June 2016 the UK voted to leave the European Union by 52% to 48%. Like the general population, the farming community is divided over Brexit.

3.36 The EU's Common Agricultural Policy has come under a lot of criticism, for being expensive and in the past encouraging over production. Many UK farmers also find that European agri-environment schemes and policies such as 'the three crop rule' (where

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<http://democracy.devon.gov.uk/documents/s4107/BSS%2016%2012%20The%20County%20Farms%20Estimate%20-%20Arc%20Addington%20Awards%202016.pdf>

¹² <https://www.gov.uk/government/collections/rural-urban-classification>

farmers with more than 30ha of arable land are required to grow three different types of crops) do not translate well in the UK. Leaving the EU will provide the UK with an opportunity to create its own agricultural policy; one which will sustain the social and economic structure of the countryside and help to protect the environment and landscape.

3.37 Current World Trade Organisation (WTO) rules restrict domestic policy and subsidy payments which encourage production¹³, consequently limiting the UK's ability to increase its self-sufficiency. There is a strong case for the WTO to allow for subsidies and marketing boards to maintain strategic industries such as agriculture in profit to the point of self sufficiency. This is good housekeeping, a good example to the developing world and prudent in a world where population has increased from 3 billion in 1960 to over 7 billion today and is still rising. Brexit and the uncertainty surrounding American foreign policy provide the impetus for change at the WTO. This would enable the creation of a system of farm subsidy payments and marketing boards created specifically for UK agriculture, alongside new opportunities for marketing British food within the UK and abroad.

3.38 However, at the time of writing, Article 50 has yet to be triggered and the Government is keeping its cards firmly under the table relative to the UK's post Brexit trade negotiations with the EU. The Government has pledged a two prong agricultural and environmental package of support for UK agriculture but the policy detail has yet to emerge. The Treasury currently pays every penny of support received by agriculture through the Common Agricultural Policy and other funds but despite this many are concerned that agriculture will not be given the necessary prominence politically in trade discussions with Europe to secure an agreement that will benefit UK agriculture.

3.39 There is also much uncertainty around the political commitment to financial support for agriculture after 2020, with many farmers currently relying on the Basic Payment Scheme to survive. Current levels of subsidy are within the UK revenue budget and there are compelling reasons to design a new package of support for long term security for agricultural (which would be paid only when necessary to maintain profitability for a level of production that ensures self sufficiency). However the uncertainty has caused apprehension for many in the agricultural industry and farmers are asking for more information and assurance in terms of the financial support they can expect to receive post Brexit.

4. Conclusion

4.1 Agriculture nationally is facing a number of challenges and many of these challenges are felt profoundly by Devon's small and family farm businesses. The combination of low and unstable produce prices, increased land prices, high feed costs and TB management means that for many, traditional agriculture is no longer profitable. TB is devastating for farmers, emotionally as well as financially. The current system of financial support for farmers is subject to a number of criticisms. Complexities around retirement, succession, the cost of land, and access to housing and capital has led to an aging farming population and difficulties for young farmers and new entrants.

4.2 The long term impacts of Brexit are still unknown and there will undoubtedly be challenges for the UK agriculture sector. However, with the right support and direction from

¹³ https://www.wto.org/english/thewto_e/whatis_e/tif_e/agrm3_e.htm

central government, exiting the European Union will also provide the UK with an opportunity to create a UK centred agricultural policy, redevelop agricultural support and promote and deliver greater self-sufficiency in food production.

5. Membership

Councillors Brian Greenslade (Chairman), John Berry, Tony Dempster, Richard Hosking and Ray Radford.

6. Sources of Evidence

The task group heard testimony from a number of witnesses and would like to express sincere thanks to the following people for their contribution and the information shared.

Steve Turner	Economy & Enterprise, Devon County Council
Mr & Mrs Webber	Dairy Farmers
Mr & Mrs Lammie	Dairy Farmers
Mr & Mrs Vallis	Dairy Farmers
Andrew Butler	Devon NFU
Stewart Horne	West Devon Business Information Point
Richard Soffe	Bicton College / Duchy College
Michael Winter	Exeter University
Matt Loble	Exeter University
Stephen Dennis	Farming Community Network
Sarah Harrison	Devon Norse Catering
Jilly Greed	Beef and Cereal Farmer, Co-Founder Ladies in Beef
Dolores Riordan	Devon & Somerset Trading Standards
Claire Bellew	Devon Young Farmers
John Varley	Clinton Devon Estates
John Waldon	Dartmoor Commoners Council
Neil Parish MP	MP for Tiverton & Honiton and Chair of the Environment, Food & Rural Affairs Select Committee
<i>Written submission</i>	West Devon Dawn Meats
Dan Meek	NPS (County Farms Estate)
Matthew Jones	Procurement & Estates, Devon County Council
Councillor Caroline Chugg	Chairman of the Farms Estate Committee
Jerry Brook	Vice Chairman of the Farms Estate Committee
Mark Buckingham	Monsanto
James MacGregor	Riverford Organics
Humphrey Richards	Lloyds Bank
Mark Shepherd	Waitrose
John Channon	Dartington Estate
Peter Doyle	External Affairs, Devon County Council
Kevin Bateman	Tenant Farmers Association
Ann Maidment	CLA
Graham Clark	CLA

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7. Contact

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