

## **Wildlife and Countryside Link response to the Consultation on the Rural Development Programme for England 2007 - 2013**

Wildlife and Countryside Link welcomes the opportunity to respond to the consultation on the draft National Strategy for the next Rural Development Programme for England 2007 – 2013 (the 'next ERDP'). Wildlife and Countryside Link (Link) brings together voluntary organisations concerned with the conservation, enjoyment and protection of wildlife, the countryside and the marine environment. Our members practice and advocate environmentally sensitive land management and food production practices and encourage respect for and enjoyment of natural landscapes and features, the historic environment and biodiversity. Taken together, our members have the support of over eight million people in the UK and manage over 476,000 hectares of land. This response is supported by the following organisations:

- Bat Conservation Trust
- Butterfly Conservation
- Buglife – The Invertebrate Conservation Trust
- Campaign to Protect Rural England
- Council for British Archaeology
- Council for National Parks
- Herpetological Conservation Trust
- Plantlife International
- Royal Society for the Prevention of Cruelty to Animals
- Royal Society for the Protection of Birds
- The Wildlife Trusts
- Woodland Trust

### **General Comments**

The ERDP is one of the key delivery mechanisms that working through the farming industry brings together economic, social and environmental measures to secure an ecologically functional countryside. This allows the delivery of a wide range of ecosystem services<sup>1</sup> to society including: meeting biodiversity targets, protecting and enhancing our landscapes, maintaining the rural environment's historic dimension and landscape character and providing enjoyment and understanding of the countryside. Link urges the Government to put the long term objectives of land management at the heart of the reform of agricultural funding and to develop the next ERDP as the main means of delivering these objectives. The next ERDP should be designed to respond to the future challenges our rural environment faces, rather than referring to the past in terms of how the current ERDP has been used.

Link has been concerned that the process for developing and consulting on the next ERDP has not been transparent and has been much delayed. We welcome the opportunity to comment on this Strategy consultation, but are concerned at the lack of engagement opportunities being offered to external stakeholders on the next

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<sup>1</sup> Ecosystems and the biological diversity contained within them provide many goods, services and other benefits to humans – these benefits are known as ecosystem services. As an example, ecosystem services include pollination, soil fertility, clean air and water, oxygen supply and carbon dioxide absorption.

ERDP programme, which we understand is being developed internally. Several of our comments in this response relate to the programme, and we recommend that the RD Policy Advisory Group (PAG) is used to input to the programme development.

We also recommend that the RD PAG is used to contribute a broader overview to rural development policy, for example, in relation to the parallel Hill Farm Allowance (HFA) consultation process. Links between rural development, agri-environment and uplands policy areas could be significantly improved and future HFA options could be better integrated with Environmental Stewardship (ES) if such an approach were adopted.

### *Monitoring*

Link urges Defra to give serious consideration to establishing a suitable national forum to monitor delivery of the programme. This could take the form of a Ministerial forum, similar to the National ERDP Consultation Group that was formed at the start of the current ERDP, or a regular meeting at a Ministerial level with representatives from key rural development sectors and interests. A number of Link organisations have regional representatives who are able to provide feedback on ERDP progress and delivery issues. This can provide invaluable insights for evaluation purposes and can be conveyed through stakeholder engagement mechanisms at both regional and national levels. Link recognises that the accrual of information of this type must be through structured systems of engagement and would look to assist Defra in defining how input from Link members, regionally and nationally, can be most usefully contributed.

### *Uplands*

There is an urgent need to appraise the broader public benefits of upland management for natural resource protection along with the high environmental quality contained in upland landscapes and biodiversity. However, the high quality of uplands goes beyond the importance of these landscapes for attracting tourists. The inter-relationship of environmental, social and economic factors are clearly manifested in the appearance of our upland landscapes and natural resource protection and environmental land management should be at the heart of the justification of public support for upland farming.

### *Climate change*

A major challenge is how we can begin to prepare for the impacts climate change will have on our rural landscapes and economies. We do not believe the current proposals for the next ERDP place enough emphasis on the role that the programme can and should play in mitigating the effects of climate change on the semi-natural environment and assisting its adaptation to changing conditions. A key factor is the fragmented state of our semi-natural environment and the next ERDP is one of the key mechanisms for creating a more robust and resilient countryside, able to cope with the quickening pace of environmental change.

It is particularly important in having the potential not only to conserve existing sites but also to help reverse fragmentation by expanding, buffering and linking them, and making the wider agricultural matrix more sympathetic to the management of these sites at a landscape scale. These actions will lead to improved links between discrete areas of habitat so that wildlife will have the space it needs to survive, adapt

and disperse as a result of changes to the environment brought about by climate change. A policy of reversing habitat fragmentation will also help to strengthen landscape character.

#### *Integration of measures in the next ERDP*

Link is concerned about how integration of measures across the three axes will be achieved. There is a need for particular clarification on how Axis I and III rural development measures will be integrated by the RDAs with Axis II measures which are the responsibility of Natural England. This is particularly important in the uplands. The EU recognises integration is important but we are not clear from the content of the consultation how this will be achieved.

### **Bioenergy crops**

#### *Accreditation and bioenergy crops*

Link believes that an accreditation system should be established for bioenergy production that sets minimum environmental standards and encourages high greenhouse gas emissions savings across the full life-cycle of the product. This would ensure significant and genuine emissions savings are made and that sustainability is not undermined through damage to biodiversity, soil or water. Link believes this scheme should apply to the whole bioenergy sector. By stimulating these markets we may see a return to landscape scale woodland management, which should also help to deliver certain biodiversity and landscape benefits.

Link believes that bioenergy crops have the potential to make a useful contribution to the renewable energy mix to reduce global warming within the period of the next Programme. While Link believes that in the right places and under the right management bioenergy crops can contribute to current sustainability targets, there is a risk of environmental damage if they were to be cultivated without proper assessment. It is essential that robust environmental safeguards and proper site-specific checks are put into place early in the cultivation planning process and that monitoring is undertaken, to avoid irreversible damage to biodiversity, the archaeological resource or to historic landscape character.

The versatility of individual bioenergy feedstocks should be encouraged to maximise the potential environmental benefits of bioenergy while avoiding some of the risks, such as block cropping. The combining of different feedstocks including crop residues and by-products from livestock farming could encourage a mixed farm regime, with associated benefits to habitat and landscape character. The integration of a wide range of fuel sources could also allow farmers who are not able to enter into long-term production contracts to contribute to bioenergy production and at the same time derive an income stream through management of their valuable landscapes and habitats.

#### *Bioenergy crops and the next Programme*

Where bioenergy crops are produced sustainably, located sensitively and carefully managed with consideration for wildlife they have the potential to contribute to climate change mitigation while enhancing the environment. Short Rotation Coppice (SRC) and Short Rotation Forestry (SRF) could be beneficial adjacent to existing

woodlands by reducing habitat fragmentation, for instance. However, there are a number of risks to biodiversity posed by an increase in bioenergy production:

- *Important land-uses may be displaced* - wet grasslands, for example, may be put under SRC production, damaging breeding wader populations. The most immediate risk is losing agricultural set-aside and the wildlife benefits this policy measure has inadvertently created, as well as losing important spring-sown crops to winter sown oilseed rape. Scenarios suggest 459,000ha of oilseed rape alone would be needed to meet the EU biofuel inclusion target of 5.75%. This is equivalent to approximately 75% of land currently in set-aside.
- *The introduction of new crops and new management regimes* at commercial scales that may have low biodiversity value, including, in the longer term, genetically modified varieties of energy crops.
- *The simplification of the arable landscape* through the creation of energy crop monocultures around processing plants. Increased block cropping could adversely impact upon wildlife, landscapes and the historic environment, with associated damage to landscape character, the diversity of cropped habitats and considerable refinery traffic movements. Small-scale biofuel projects are less likely to lead to these consequences and should be supported through measures in the next ERDP.
- *The intensification of woodland management* as a result of the interaction of environmental and economic consequences arising from the increased demand for forestry products.

There is also the question about how choice over this new land use will be made in the context of other land uses and how the public and local communities can contribute to the planning of bioenergy cultivation that are delivered through the next ERDP. The use of land for bioenergy production may have far-reaching implications for rural economies and habitats. Taking land out of food production could alter the range of farming services and markets in an area that previously had been focussed on food production. Other farmed land and the habitats it contains could be made less viable or more fragmented. Overall, Link believes that the need for rigorous and robustly scoped Environmental Impact Assessment is clear.

Link strongly urges that there should be no direct funding support for biomass crops, which would amount to a coupled production payment like old-style CAP payments. Instead, agri-environment measures should be developed to improve the environmental performance of bioenergy crops as they have been for other important land uses.

Link has concerns over policies that favour increased bioenergy use but result in high quantities of imports where they are unsustainably produced, and unsustainable planting of non-native or new types of crops with damaging environmental effects and a reduction in demand for home grown bioenergy crops. Specifically, Link draws attention to the issue of Short Rotation Forestry as discussed in the recent report produced for Forest Research by LTS International. We recognise that some bioenergy crops have beneficial effects - sustainably produced SRC in the right place could be hugely beneficial in buffering and extending established woodlands, and can represent a reduction in chemical inputs (post-establishment) compared to alternative intensive management. Landscape effects will vary from crop to crop:

miscanthus for example, will have significant effects both because of the height of the crop and because it is a non-native species.

The location, scale and combination of bioenergy crop plantings is, therefore, the key to ensuring that they add attractive diversity to the landscape, reduce habitat fragmentation and avoid harm to wildlife, landscape character and the historic environment. Link believes that environmental checks on bioenergy crop planting grants should be the same as currently applied to the England Woodland Grant Scheme (EWGS) (such as by direct consultations with Historic Environment (HE) records on archaeological matters) to avoid grant-aided irreversible damage to the historic and natural environment. Unless Environmental Impact Assessments have a specific archaeological and biodiversity dimension and are informed by and checked by HE records, we do not feel they will adequately address this issue. It is also important that the criteria by which the significance of change in land use is assessed do not render the EIA process ineffective.

Link strongly suggests that further research be conducted into the sustainable production of bioenergy crops. A rigorous assessment of the sustainability of sites for bioenergy crop production will be necessary within the next Programme, particularly sites of high conservation value such as Ancient Semi-Natural Woodland, Planted Ancient Woodland Sites, SSSIs, SNCIs, Local Nature Reserves, and Registered Ancient Monuments. Local Landscape Character Assessments, where they have been undertaken, also need to be included in the same process. Link believes that bioenergy could present a significant opportunity for regenerating woodland management within our existing woodland resource and suggests that EWGS funding or measures for bioenergy production under Themes 1 and 3, but not coupled production support, contribute to achieving this aim.

### **The work of the Land Use Policy Group (LUPG)**

Link strongly urges Defra to take account of the useful work LUPG's Woodland Policy Group has done in identifying recommendations for Forestry Measures in UK Rural Development Programmes for 2007-2013. We believe that the 26 recommendations as set out in their report are of relevance to the next ERDP.

We also welcome the publication of the manual produced by the LUPG, with WWF and Natur en Milieu, '*Rural Development Environmental Programming Guidelines*', which examined how the delivery of environmental outcomes could be met in a substantive and integrated way. This document is likely to be particularly useful to regional delivery bodies in ensuring an integrated approach is taken to delivering the measures contained within the Regional Implementation Programmes.

### **The proposed four core principles for the strategy for the next ERDP (Questions 1 – 3)**

Link believes that the principle that public money should be used to secure public goods should be made more explicit in the core principles than is currently the case.

#### *Animal Welfare*

One of the strongest reasons for public support for English agriculture is the relatively good condition of animals on English farms. In an increasingly competitive arena, it is crucial that the Government shows leadership in securing animal welfare standards. Link believes the current content of the draft National Strategy on animal welfare issues is inadequate. Seven of the 34 measures set out in Regulation 1698/2005 aim to promote animal welfare. However, the next ERDP includes only one of these seven possible animal welfare measures and even this measure, which focuses on training, has animal welfare as only a partial goal.

Link believes that it is important to focus measures in the next ERDP on Defra's strategic priorities and other commitments contained within the Sustainable Food and Farming Strategy (SFFS) and the Rural Strategy, and to have targeted measurable goals. There are a number of strategic high level animal welfare goals in these strategies. The four strategic goals in Defra's and the UK farm strategies (including for example the Food Industry Sustainability Strategy and the SFFS) that refer to animal welfare and encourage the building of a more competitive sustainable farming with high welfare goals, have essentially been ignored. Many of the welfare legislative drivers are also missing from the consultation document, in contrast to environmental drivers.

This has led to a vacuum in the strategy for animal welfare measures particularly under Theme 2 where there is only one reference to an animal welfare opportunities, and even that is one that already existed under previous Pillar 2 opportunities since 1999. Defra have ignored opportunities that are central to the theme of making agriculture more competitive and that would provide crucial links with the other opportunities in this theme, whilst at the same time being measurable and providing value for money. To address this, Link suggests the inclusion of the words "*and those promoting higher animal welfare standards*" within the final text of the strategy.

The development and use of on farm welfare indicators means that welfare improvements, as well as any consequential benefits such as improving farm animal health status, can be measured. Economic research can identify precisely the consequences of increases in welfare improvements. Animal welfare measures can be targeted to produce social, environmental and health benefits.

As other Rural Development Programmes (RDP) have included many more animal welfare measures, Link strongly believes that English farmers will be disadvantaged through the next ERDP if they wish to improve animal welfare. With measures for welfare improvements included under the Scottish RDP and the Welsh RDP (in addition to other Member States such as Austria), the next ERDP will raise issues of equity in the UK and there is a risk that the next ERDP will not have any synergistic matches with recent and forthcoming improvements in EU welfare legislation. As a result, Link strongly urges the Government to include more animal welfare measures within the next ERDP.

Clearly, the inclusion of additional measures results in budgetary implications. The RDP budget is stretched to meet existing priority measures, and the current situation arising from the EU budget decision adds more pressure. Nevertheless, animal welfare advantages could be more explicitly gained from existing measures designed for environmental benefits, and we recommend that such synergies are drawn out in the next ERDP. Additional animal welfare measures will require sufficient funds, over and above those required to meet existing environmental commitments, to be secured via voluntary modulation or match-funding.

## **Proposals for complementing and co-ordinating with other EU funding instruments (Question 4)**

Link agrees that the next ERDP should complement other policies and funding streams. Indeed, we believe that such an approach is vital to ensure joined up funding mechanisms can deliver all that is required of the next ERDP in terms of England's natural environment.

### *Funding*

Link was concerned to learn that the EU budget negotiations are likely to leave the next ERDP significantly under resourced. Link is concerned about the future relationship between modulation and match funding, and continues to support increases in modulation providing there is match funded support from the Treasury in the medium term, to demonstrate the Government's commitment to rural development measures.

The next ERDP (particularly Theme 1, but also Themes 2 and 3) should seek to deliver key strategy targets such as the revised England Forestry Strategy, the England Biodiversity Strategy, Plant Diversity Challenge (the UK's response to the Global Strategy for Plant Conservation), FC and Defra's new ancient woodland policy, Keepers of Time, the Farmland Bird and SSSI PSAs, the Gothenburg commitment to reverse biodiversity declines by 2010, and the revised Biodiversity Action Plan (BAP) targets. There are also clearly a wide range of other policy areas for which the next ERDP will be a key delivery mechanism, such as land use changes needed to deliver the Water Framework's Directive catchment sensitive farming and diffuse pollution. The recently signed European Landscape Convention will also bring a responsibility to enshrine the importance of landscape within the next ERDP and raise the importance of maintaining and enhancing our landscapes across all policy areas.

The integration of the historic environment into agri-environment policy is particularly significant. Considering the full list of the key policies and strategies that require elements of ERDP funding, we are concerned that Defra should ensure sufficient funding is secured throughout the duration of the programme. The number of land use policies and strategies that aim to deliver public benefits are increasing. Associated targets (e.g. the BAP - for which the ERDP is essential) are also increasing as awareness increases about the scale of the task we face. All of these delivery objectives will require substantial increases in funding.

Link notes that delivery of the next ERDP should reflect Defra's commitment to streamline funding. ES now provides a mechanism to deliver a full suite of land management grants, including woodland. EWGS provides a full suite of woodland grants. Link is pleased that Defra is proposing to streamline these two funding mechanisms into one Environmental Land Management Fund (ELMF) from 2007. Link has believed for some time that we should move towards a single support mechanism for the delivery of public benefits in the countryside. A single ELMF, if it is to meet the above targets, is likely to require significantly more money than Pillar 2 currently receives and carefully developed policy and funding interventions from

Government will be needed. If the ELMF is to become the future vehicle for all farming support, as stated in the Defra/HMT Vision document produced in December 2005, its objectives, resourcing and delivery mechanisms will need to be expanded significantly, and the next ERDP should be designed with this in mind.

Given that the majority of the funding for the next ERDP will be administered by Natural England (NE), iteration between national, regional and local policies and decision making processes will be crucial in terms of making the most of the land management measures of the next ERDP. Clearly the relationship between NE, the Forestry Commission, English Heritage and the Environment Agency is also critical to ensure the best use of ERDP resources to deliver a joined up approach to land management. It makes little sense for a full suite of woodland options to be administered by NE and FC separately and for this reason we support the development of the single ELMF. The protocol for delivery of funds through the National Parks is one welcome iteration of the relationship between national, regional and local level partners, with the National Park Authorities taking on a frontline role in advice, delivery and aftercare.

## **Theme 1: Enhancing the Environment and Countryside (Questions 5 – 8)**

### *Environmental Stewardship*

Given Government statements following the EU Budget announcement in late 2005, (that sufficient funding will be made available to meet Government agri-environment commitments - 70% ELS coverage in the lowlands, higher uptake in the LFA, plus HLS and EWGS targets), Link is concerned at the delay in announcing the next ERDP funding. We are further concerned at apparent backsliding in terms of funding commitments, with recent statements in meetings with Defra staff to the effect that funding for ES and EWGS will be retained at current levels (which is patently different from meeting the original commitments) and evidence that HLS is not being vigorously promoted, which will keep scheme costs down. Link awaits confirmation of full ERDP funding details to resource the original scheme commitments.

While Link members have contributed very considerably to the development of the current Environmental Stewardship programme, it is clear to us that the environmental benefits achievable through the existing ES are capable of considerable expansion.

Public support for agri-environment schemes is strong and a vital contribution to ensuring long term management of the countryside. Expansion of Environmental Stewardship at both entry and higher levels could greatly enhance the public's experience of the landscape, wildlife and the cultural heritage of the countryside. The economic and social value of such expansion is well recognised. Link urges Defra to show leadership in expanding agri-environment schemes.

### *Historic environment*

ES has a significant role to play in protecting the historic environment. In particular there are problems in using the very incomplete Schedule of Ancient Monuments as a proxy for 'importance' in the identification and targeting of archaeological sites, while the points allocations for permanent grassland differentiate very little between those offered for grassland protecting earthwork or buried archaeological sites and that which does not. This is one of the most important dimensions of the ES, and

represents the best and most sustainable long-term conservation of the archaeological resource. Not only does the current allocation arrangement singularly fail to incentivise the selection of fields offering the maximum environmental benefits to be gained, but also, because of the very low benefit to the farmer, it leads to failure to submit a proposal for grassland and results in an under-reporting of the scope and benefits that can be achieved.

More generally on this point, we would express our concern that the continuing problems in providing adequate baseline environmental mapping to farmers – and in particular the extensive information on the archaeological resource available from Historic Environment Records, which contain much larger amounts of information than national level sources, meaning once again that opportunities for positive and urgent management of elements of the historic environment are being missed. This is partly a function of the wider problems of the mapping provision for ELS and partly because Defra and the local authorities still need to develop protocols for the provision of this information. However, after the great efforts put in by local authority archaeological services in the pilot phase of the development of ELS, we find the subsequent lack of progress to be very disappointing. This results in both a reduction in the overall benefits currently being provided by ES to below the maximum possible, and a limitation in the opportunities for positive management made available to the individual farmer.

#### *Cross-compliance and GAEC*

We are concerned to note there is no reference to the role of cross-compliance and GAEC in assisting the delivery of the objectives of Theme 1. Whilst we are aware of the Treasury's and Defra's desire to see an end to Pillar 1 by 2015 - 2020 as set out in its policy paper 'A Vision for the CAP', Pillar 1 is likely to exist for the life of the next ERDP. Given that as much as 80% of the budget will be needed for Theme 1, we believe it is critical that this consultation exercise and subsequent reviews of GAEC, consider how and where the GAEC requirements can most effectively contribute to achieving the outcomes of the options available in ES. Clearly there is scope to deliver considerable environmental benefit on farms through imaginative use of GAEC, thereby reducing financial pressure on the land management measures in the next ERDP. However, Link would strongly assert that this could not be a substitute for options available within entry and higher level ES for these features.

However we recognise this needs to be considered within the context of the resource capacity of farmers and other land managers to deliver GAEC requirements and to be able to enter ES.

One such suggestion, which we would strongly support, is articulated in LUPG's recommendation 2<sup>2</sup>. This states "*there should be a review of the most cost-effective options for encouraging farmers to allow woodland regeneration or establish extensively managed agro-forestry systems on existing farmland eligible for decoupled Pillar 1 payments*" (SPS). Clearly such capability, subject to the other considerations relating to the establishment of woodland outlined above would reduce pressure on the next ERDP to do the same. LUPG recommendation 17 also refers to this point.

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<sup>2</sup> From: Swales, V., Keenleyside, C. and Farmer, M. (2006) Recommendations for Forestry Measures in UK Rural Development Programmes for 2007-2013 - A Report for the Land Use Policy Group. IEEP: London.

### *Facilitation of advice*

Link believes the provision of advice to land managers on sustainable rural development is vital for the successful delivery and integration of the successor ERDP measures including measures from Themes 2 and 3.

Link believes the opportunities of integrating forest and woodland management with agri-environment measures have been missed in the consultation. It is important that the priorities in Theme 1 (i – vi) can be used in a way that produces multiple benefits rather than singular priority targeting. This is particularly important for woodland to avoid a piece meal approach.

Link believes one key challenge missing from the consultation are measures to aid adaptation to climate change. Link strongly encourages Defra to give priority to retaining the functionality of ecosystem services in the face of climate change. We believe that this should involve using the next ERDP as a mechanism to reverse fragmentation of habitats and improve the resilience of existing habitats to climate change, by buffering and expanding them through habitat creation. This is particularly the case given the claim in section 39 that the Government is committed to the implementation of Article 10 of the EU Habitats and Species Directive. We greatly welcome this commitment as a long overdue commitment. We are however surprised to see it included given Article 10 has not been transposed into the Conservation (Natural Habitats, &c.) Regulations 1994.

Link agrees with the challenge that there needs to be rigorous assessment of sites for biomass planting and have similar concerns regarding climate change and bioenergy crops, as outlined in earlier sections of this response.

In terms of the priorities we believe there is a need for clarity of wording. Section 41(i) simply suggests “*improving the status of habitats and species...*” We believe this should be clarified to include “*improving the status, through protection, restoration, creation and conservation of habitats and species...*” Link believes that this would better reflect BAP objectives.

Link seeks confirmation that the features listed within Section 41(iii) on the historic environment include living natural historic features, such as ancient trees, in this section.

Whilst Link welcomes the inclusion of “promote sustainable forest management” (Section 41(vi)) as a priority, we do not see why this has been drawn out as a separate priority. The EAFRD regulations raise the profile of forestry such that a joined up approach to land-use is now the expected way forward. Sustainable forest management should be integral to these priorities not drawn out separately.

We would also suggest two further items under ‘Conserve wildlife/biodiversity’. Firstly, this priority should explicitly require delivery of HAP targets. Secondly, a priority should be given to the 2010 PSA target for “Halting the loss of Biodiversity”.

In terms of joined up delivery across themes it is important that grant schemes are able to deliver cross-theme outcomes, as encouraged by the Leader approach.

Finally, we would stress the continuing need to ensure that all complementary objectives are thoughtfully scoped against one another, to avoid unintended conflicts of objectives. An example of this would be where resource protection objectives argue for cultivation of land to reduce runoff in an area, which could be detrimental to an archaeological site on the land. Such situations are very seldom irresolvable, but a clear suite of protocols needs to be developed so that these contradictions can be explicitly recognised and priorities systematically determined.

## **Theme 2: Making Agriculture and Forestry More Competitive and Sustainable (Questions 9 – 12)**

Although there are sound priorities under this Theme such as the inclusion of biomass, it is, as mentioned above, incongruous and incompatible with the Theme to ignore the animal welfare issues in this section. Many of the economic drivers in the legislative programme in the next seven years will concern animal welfare and if incentives are not given under this section, farmers in England will not be able to be competitive. There are some simple solutions to rectify this, including bringing in new ideas such as membership of higher welfare assurance schemes, and incentives to market higher welfare and environmental products. Without such new thinking, agriculture in England risks becoming less competitive, sustainable and supported by the public.

As outlined in our general comments above, Link also has concerns about the location and scale of bioenergy crop plantings, to ensure they do not have negative effects on wildlife, landscape and historic environment. Stimulation of biomass markets, under Theme 2, is the most obvious way to kick-start a sustained return to use of our timber (see also LUPG recommendation 4<sup>2</sup>). We need to look closely at issues such as accreditation to ensure that use of timber from existing woods, particularly ancient woods, is done sustainably. Having stimulated these markets we may then see a return to landscape scale woodland management, which should also help to deliver certain biodiversity and public benefits. It is this kind of approach to the use of ERDP finances that is an effective way to ensure cross theme delivery.

Recreation and access deserve to be recognised as a priority under skills and knowledge transfer. Recipients of ERDP funding are well placed to deliver outdoor leisure activities, but only if the skills and knowledge are present (see also LUPG recommendation 8 and 20).

In terms of skills and knowledge transfer under Theme 2 it is also important that there are mechanisms within the EAFRD to fund work that will enable innovation. Availability, access to and dissemination of research outputs should be included as a Theme 2 priority.

### *Forestry standards*

Link believes that the UK Forestry Standard must be applied to all Tier 2 and 3 funded woodland planting and management, not just grants administered by Forestry

Commission England, but by all of the Defra family. The 2007-13 EC Rural Development Regulation requires the 'sustainable use of forestry land' under Article 36b, in accordance with the MCPFE agreements<sup>3</sup>, which includes the 'Helsinki Principles' of sustainable forest management. The UK implemented the 1993 MCPFE Helsinki Principles<sup>4</sup> via the 1998/2004 UK Forestry Standard<sup>5</sup>.

### *Forest Environment Payments*

The ERDP definition of High Nature Value Forestry (HNVF) systems should be used to as eligibility criteria to target Forest Environment Payments for clear biodiversity priorities.

The HNVF (forestry) definition must include features and areas of significance for biodiversity, and the forest systems and operations that are used to protect and enhance these features and areas. This includes 'non-woodland' as well as 'woodland' species and habitats.

### *Suggested HNVF definition:*

- Designated areas covered by Natura 2000 Payments: Special Areas for Conservation, Special Protection Areas.
- Other designated areas: Ramsar Sites, National Nature Reserves, Sites of Special Scientific Interest.
- All ancient woodland on the inventory of ancient woodland, and other known sites which meet the same criteria, including ancient semi-natural woodland, other semi-natural woodland, plantations on ancient woodland sites, semi-natural features in plantations on ancient woodland sites.
- Priority species and habitats: EC Habitats Directive Annex I habitats and Annex II species; UK Biodiversity Plan priority species and habitats.

## **Theme 3: Enhancing opportunity in rural areas (Questions 13 – 16)**

In terms of enhancing opportunity in rural areas, Link supports the approach proposed. Link believes that it is only by stimulating sustainable markets, enabling innovation and ensuring rural communities have skills and knowledge that priorities can be delivered. Positive measures deriving from ES and other schemes (for example the care of traditional field boundaries and buildings in the countryside) will provide a driver for the expansion of the rural skills base.

Link believes the innovative use of ERDP resources targeted under Themes 2 and 3 could assist with the delivery of many Theme 1 outcomes.

## **The Leader Approach in the New Programme (Questions 17 – 18)**

Link supports the approach taken, with Leader ceasing to be a separate programme and becoming integrated into the new programme with the emphasis being on Leader cutting across themes.

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<sup>3</sup> See <http://www.mcpfe.org/resolutions/> and RDR paragraph 32, p4

<sup>4</sup> See <http://www.mcpfe.org/resolutions/helsinki>

<sup>5</sup> See [http://www.forestry.gov.uk/pdf/fcfc001.pdf/\\$FILE/fcfc001.pdf](http://www.forestry.gov.uk/pdf/fcfc001.pdf/$FILE/fcfc001.pdf)

We are pleased to see an emphasis on innovation in Leader, together with locally driven public/private partnerships. Clearly Leader can be used to pilot new projects locally, which can then inform wider support through the other themes. Delivery of public benefit under the next ERDP will clearly benefit from such an approach to innovation and research. Link believes that opportunities should be explored in how Leader can be used at a Joint Character Area scale to take advantage of geographic, cultural, social and economic synergies.

We would, however, observe that recently the local administration by RDAs has resulted in some poor decisions about schemes whose wider environmental impact has not always been recognised as it was outside its 'normal' funding stream. An example of this is where land-based schemes, such as energy cropping or the growing of roots for sale for miscanthus cultivation, have been funded under an economic heading and hence evaded the environmental checks and consultations to which a land-based scheme would be subjected. Link expects these discrepancies to be resolved in any unified scheme.

### **Delivery Arrangements for the New Programme (Questions 19 – 20)**

Whilst we are generally happy with the balance between national strategy and co-ordination on the one hand and regional flexibility on the other, it is essential that the next ERDP provides the Regional Implementation Plan process with a clear steer on priorities for delivery and mechanisms for ensuring integrated approaches across the themes. While Link supports regional decision making and targeting, this should be done on the basis of delivering clear national priorities. Defra should not simply delegate responsibility for delivery of the next ERDP to regional delivery bodies without ensuring a national assessment mechanism exists so that Regional Implementation Plans can be assessed for how effectively integrated approaches are being delivered.

Whilst regional and local flexibility is important, it should not be totally autonomous, but should be done within a national context, such that regional flexibility contributes to achieving the aims of the national strategy. Link therefore urges Defra to give serious consideration to establishing a suitable national forum to monitor delivery of the programme. This could take the form of a Ministerial forum, similar to the National ERDP Consultation Group that was established at the start of the current ERDP or a regular meeting at a Ministerial level with representatives from key rural development sectors and interests.

However, we would sound a note of caution with this approach based on the experience of national and local differences within the UKBAP. This is of particular importance as the ERDP is a key funding mechanism for BAP delivery, with the BAP being one of the priorities for Environmental Stewardship, the largest element of Theme 1. National BAP targets and priorities are often not translated into local BAP targets and priorities. This is because a species or habitat that is a national priority may be locally common and therefore not feature in the local BAP.