

Joining the dots - ELM and LNRs

Between now and 2024, there will be a system of around 50 Local Nature Recovery Strategies cumulatively covering the whole of England, while simultaneously the government is changing the shape of farming policy and initiatives to deliver public goods through the Environmental Land Management (ELM) Schemes.

While the direction indicated by these two policies is certainly a positive move for nature recovery, it is not clear at this critical juncture how they will work together cohesively in order to deliver the Government's own targets under the Environment Act and its commitments under the 25 Year Environment Plan (25YEP).

By itself, neither policy would be sufficient to reverse the decline of biodiversity, but if both are well designed and work together, they could make a major contribution. LNRs will be vital for identifying local priorities for driving nature's recovery. ELM will be the most significant source of funding to deliver this positive change, as identified and targeted by LNRs, which should help facilitate effective delivery at scale. Currently, however, there is a real risk that LNRs and ELM could fail to work effectively together.

Key recommendations

ELM:

1. **ELM funds must be allocated according to environmental need.** Funding within ELM schemes must spatially target the opportunities that have the most potential to deliver for nature.
 - a. **Defra should clarify how ELM schemes are spatially targeted** to ensure that farmers and land managers are informed about the way the scheme will be administered.
 - b. **It is essential that LNRs inform the scoring criteria applied to LNR** because ELM will be the most significant source of funding for nature's recovery and LNRs should help facilitate its effective delivery at scale.
2. **LNR must have flexibility in its options** to ensure maximum environmental delivery from LNR. Flexibility will allow management to be tailored to deliver priorities in a local context.

LNRs:

3. **Guidelines must require that national priorities are considered** if LNRs are to be used to enable and inform LNR to deliver those priorities in a locally appropriate way.
4. **Strategies need to be quality-assured and connect up across England** because there will be much variation in experience and expertise within the LNR system and, collectively, they will form the national Nature Recovery Network.

LNRs guide the location, content and ambition; ELM is the delivery mechanism

We welcome that ELM will provide an integrated and holistic framework to deliver on multiple objectives and priorities such as those within the 25YEP, including for the historic environment, and the Net Zero Strategy. However, to achieve the scale of ambition set out by the Government for nature, it is imperative that where ELM schemes will be delivering for species and biodiversity they must be underpinned and driven by LNRs. This is particularly important for Local Nature Recovery (LNR) and Landscape Recovery (LR).

LNRs must be integrated into ELM design because both will fail to meet their objectives without this join up. Not only will we then lose a momentous opportunity to inform, underpin and deliver nature's recovery in England, but significant resource will also be wasted. Spatially targeting interventions to where there is the greatest opportunities for environmental outcome will deliver the largest returns for nature from the significant public resources due to be allocated to LNRs and ELM schemes, both at a local level and from national Government. Link estimates that, altogether, LNRs will need £36.5m to be put in place and then £16.4m per annum operational costs¹. This does not include delivery of the strategies and **without clear delivery mechanisms for LNRs, there is a risk that they will remain 'lines on a map' and will not be delivered**. Failure to integrate LNRs with delivery mechanisms such as ELM will present significant risk to both achieving environmental outcomes and ensuring that tax payers' money is well spent.

It is therefore concerning that in the recent Defra Update on the LNR scheme, there was no mention of LNRs, or detail on how the two will join-up. Communicating that LNR will help to deliver LNRs, and how this will look in practice to farmers and land managers is essential to foster engagement and buy-in to the LNRs process. In the coming months, Defra should publicly communicate how LNR and LNRs will join up and provide enough detail to enable farmers to envisage how LNR will work on their land.

In this briefing, we suggest two features of ELM (targeting and flexibility) and two features of LNRs (prioritisation and quality assurance) that should be in place to ensure that the two policies work well together.

ELM recommendation 1: ELM funds must be allocated according to environmental need

Put simply, it will prove immensely challenging to achieve the Government's nature-related targets unless funding within ELM schemes is spatially targeted to the opportunities that have the most potential to deliver for nature. Evidence from previous agri-environment schemes shows that spatially targeting schemes to areas where they are most needed and most appropriate delivers the highest benefits for nature, for farmers and is the most cost-effective approach.² For example, targeted schemes have been proven to improve populations of pollinators and farmland bird populations³.

¹ https://www.wcl.org.uk/docs/assets/uploads/LNRS_resource_requirement_estimate_summary_v2.2_1.pdf

² Austin, Z., McVittie, A., McCracken, D., Moxey, A., Moran, D. & White, P.C.L. (2015). Integrating quantitative and qualitative data in assessing the cost-effectiveness of biodiversity conservation programmes. *Biodiversity and Conservation*, 24: 1359-1375. DOI: 10.1007/s10531-015-0861-4

³ Wood, T. J. et al (2015) Targeted agri-environment schemes significantly improve the population size of common farmland bumblebee species, *Molecular Ecology*, 24, 1668–1680

Additionally, bespoke species options as part of Countryside Stewardship Scheme have been vital in species recovery projects such as Back from the Brink⁴ being able to deliver for our species in most urgent need. These existing bespoke species mapping layers and associated advice sheets need to be reviewed and improved as they will enhance clarity, simplicity and marry well with mapping priorities in LNRs.

Furthermore, given that funding for ELM and LNR will comprise a finite budget, targeting funding towards the best opportunities will ensure that public money spent through LNR and LR achieves the best outcomes for nature for each pound spent. If adequately resourced, these schemes have the potential to do much of the 'heavy lifting' for nature's recovery. Both LNR and LR will be competitive, options-based schemes, with higher payment rates, and so there is a need to show clear evidence of impact on the ground, with evidence of where each outcome is contributing to national targets.

LNRs provide a unique opportunity to inform this targeting, so that public money is spent where it will provide most benefit, while helping to monitor outcomes. However, so far, Defra has not stated publicly how LNR - a competitive scheme - will be targeted. It is not clear whether the scheme will be first come first served, or how it will be administered.

Defra should clarify how ELM schemes are spatially targeted, to ensure that farmers and land managers are informed about the way the scheme will be administered. Otherwise, there is a risk that money will be spent paying farmers for schemes that are not best suited to their land and are not going to deliver the best outcomes for nature's recovery.

As LNR will be a competitive, options-based scheme, it is essential that LNRs inform the scoring criteria applied to LNR to ensure that LNRs direct LNR schemes to the most appropriate places.

ELM recommendation 2: LNR must have flexibility in its options

To ensure maximum environmental delivery from LNR, flexibility is needed to deliver priorities in a local context. Standardised options risk being an oversimplification and generalisation, which would further undermine delivering the best against both local and national priorities.

- a. Rigid standardisation could overcomplicate the application of the system and result in administrative complexities, and so provide a disincentive to enter LNR agreements.
- b. Oversimplification or standardisation could mean that land managers are not able to receive income for delivering an action outlined in the LNRs. Flexibility is needed to ensure that actions described in LNRs are actually deliverable on the ground.
- c. Individual LNR options should have some flexibility as to what management actions are involved. There should also be some ability to tailor how agreements are put together. This would enable agreements to be put in place that are most appropriate to specific priorities to maximise environmental delivery. A further benefit is that it would allow for variation in how opportunities are identified both between and within LNRs.
- d. As LNRs are likely to be reviewed every five years, land managers in LNR (and LR) agreements must be allowed to review their agreements in-step with LNRs reviews. This

⁴ <https://naturebftb.co.uk/>

process of review should enable both policies to adapt to future national priorities as they evolve, for example through the Environmental Improvement Plan.⁵

Inevitably, greater flexibility within LNR options will require a greater investment in advice, both in capacity and skills, as land managers will need to tailor different LNR options to their land and business. Increased government-funded capacity is needed to provide more ‘boots on the ground’ to provide advice, whilst, through ELM, Defra could invest more in skills. This would ensure that more advisors are able to undertake specialist training on managing different habitats, to fit with LNR options.

This will provide greater value for money and better outcomes than rigid standardised options would, as land managers will have the help they need to maximise the environmental and business benefits from their land, rather than following a set up prescriptive actions.

LNRs recommendation 1: guidelines must require that national priorities are considered

Since ELM is intended to make a significant contribution to national targets and priorities, if LNRs are to be used to enable and inform LNR to deliver those priorities in a locally appropriate way, LNRs themselves will need to consider national targets and priorities when they are being developed. This will ensure that they are a legitimate way to allow LNR to deliver what is needed locally to meet national targets.

- a. LNRs are primarily a spatially targeted instrument for identifying nature recovery opportunities. As such, key national targets and priorities are for biodiversity and include 30x30, contributing to the national Nature Recovery Network, protected sites, and priority species and habitats. **Species and habitat targets arising from the Environment Act, will become pertinent as they are developed.** Non-biodiversity specific targets and priorities arising from the 25YEP and Environment Act should also be considered but biodiversity should always be the priority.
- b. There will be instances when prioritisation decisions will need to favour local circumstances rather than the national targets and priorities and vice versa. This flexibility is important to ensure that the best outcomes for nature are delivered, informed by local circumstances. It will also ensure that local stakeholders are fully engaged with, and co-produce, the LNRs but such decisions must have a sound evidence-base.

LNRs recommendation 2: strategies need to be high quality and connect up across England

Within the 50 LNRs there will be much variation in the experience and expertise needed to develop the LNRs and then deliver the opportunities. LNRs will also need to be joined up across administrative boundaries because, collectively, they will form the national Nature Recovery Network. This coherent connectivity across LNR boundaries will be essential to allow locally-identified priorities to guide ELM applications on land holdings that span adjacent LNR areas.

⁵ <https://www.gov.uk/government/publications/environment-bill-2020/august-2020-environment-bill-environmental-targets>

This means that there will be need for a minimum set of standards that each LNRS should meet when they are put together. It is essential that this 'minimum' is one that does not 'level-down' and instead raises the ambition of those LNRS areas that are starting from a paucity of experience and data.

- a. **There needs to be some consistency across the different LNRSs.** The statutory guidelines drawn up by Defra will be vital in providing the framework for consistency. There will be 25 Natural England Senior Advisors who will each be closely involved with two or three LNRSs. They should be able to ensure that there is a consistency in interpretation of the guidelines across the LNRSs that they are involved in. There should be opportunities for the Senior Advisors to meet together, along with the central LNRS team, to review progress and to share and learn from their experience.
- b. **There must be good connectivity across and between LNRSs.** This will ensure that there is a viable joined up network of habitats, one of the four cornerstones of Lawton's principles of '*more, bigger, better and joined*'⁶. A joined up network will be crucial for both recovery of biodiversity and to enable resilience in a climate changing world. Furthermore, without this connectivity, there will be barriers to LNR applications in farms that span LNRS boundaries.

Provided that the regulations and guidelines are sufficiently robust on the minimum set of LNRS standards, and clearly outline the roles of the responsible authority, partners and NE in the event of likely disputes, Natural England's Senior Advisors should be able to ensure that they are being followed correctly and that the LNRSs are developed to a high consistent standard. Indeed, this is one of the roles that they have been trained for. A clearly defined dispute process should enable most disputes to be dealt with early on at the local level but could escalate to an arbitrator, for example the Office of Environmental Protection or Natural England if necessary.

This should ensure that ecological priorities have been properly identified, they are suitable for targeting ELM investment, and that delivery of the strategy would contribute to the creation of a national nature recovery network.

⁶ Lawton, J.H., Brotherton, P.N.M., Brown, V.K., Elphick, C., Fitter, A.H., Forshaw, J., Haddow, R.W., Hilborne, S., Leafe, R.N., Mace, G.M., Southgate, M.P., Sutherland, W.J., Tew, T.E., Varley, J., & Wynne, G.R. (2010) Making Space for Nature: a review of England's wildlife sites and ecological network. Report to Defra.