Standards and Options Development for the Sustainable Farming Incentive and Local Nature Recovery

Wildlife and Countryside Link, August 2022

Context

Farming is currently falling behind other sectors where there are clear sector-wide targets at a macro and micro level, particularly with regard to Net Zero ambitions. The recent Climate Change Committee progress report notes that progress on setting out the contribution of Environmental Land Management and wider farming policy to lowering GHG emissions is inadequate, including for example estimating outcomes and targets for the Local Nature Recovery Scheme.[1]

A clear set of overarching climate, nature and other objectives for Environmental Land Management, underpinned by robust monitoring, will ensure that all of the schemes are clear, well-planned and cohesive. For instance, a sector-wide target for agriculture to achieve net-zero, will drive targeted farm payments, as well as private investment. This is a vital step to help move farming away from a net emitter to a net sink for carbon.

Similarly, a target for the sector on species abundance would drive the same positive change, all while enabling to sector to grow healthy and sustainable food and enhancing the beauty of the countryside for all to enjoy. These targets could be broken down by scheme, so that the Sustainable Farming Incentives drives action across the country, while Local Nature Recovery is spatially targeted toward those areas where there is most environmental need.

Articulating a 'new normal' for farming practices by the end of the Agricultural Transition (2027) will be key for a stable, clear and resilient farming sector in the future that helps to meet Government targets. A way of bringing farmers on the journey to the 'new normal' would be through a gradual increasing of ambition within the Environmental Land Management schemes over the transition, in order to bring farmers on a journey and help them to adapt.

Many policies - including the Paris Agreement - have 'ratchetting up' mechanisms to ensure continuous improvement within businesses, within a sector or cross-sector to reach a pre-defined end-point. As well as providing clarity to the farming sector, this approach would also be cost-effective, as each stage can be budgeted ahead of time to ensure value for money.

Whole-farm systems such as organic should form a core part of the 'new normal' for farming in the future. There are three core benefits to a whole-systems approach:

[1] https://www.theccc.org.uk/publication/2022-progress-report-to-parliament/

Firstly, whole-farm systems deliver multiple public goods because of the synergies between different processes on-farm, for instance practising meaningful integrated pest management across an entire farm would have the co-benefit of improving biodiversity across a farm, as nature does not adhere to field boundaries[2]. Secondly, a whole-farm approach would avoid fragmented landscapes, where ecologically sound practices across one part of a farm aren't compromised by intensive practices on another.

Thirdly, whole-farm approaches would create value for money, and generate buy-in to a new and regenerative approach to farming at a national level, changing the way the farming industry operates wholescale and generating better access to local, healthy food while also improving the landscape for the benefit of the wider public.

Priorities for the Sustainable Farming Incentive standards

Nutrient Management

General comments: We have concerns about the merits of a standalone nutrient management standard in the SFI as currently planned for the following reasons:

- A standard concerning only land management or only input management is a barrier to a more holistic way of considering nutrient management. Any standard should consider both land management practices such as improved soil health and structure, with nutrient management elements such as organic and inorganic fertiliser use.
- A sole focus on inorganic fertiliser may lead to perverse outcomes in a switch to organic fertiliser, such as increased pollution risk from inappropriate slurry or digestate spreading. Instead, an holistic approach aiming for nutrient neutrality could provide a better route forward for farmers that combines better climate, nature, air and water outcomes.
- Appropriate regulatory measures should be taken to prevent nutrient leaching by a strong regulatory baseline which aims to minimise environmental degradation as a result of inappropriate nutrient management, with incentives then delivering for public goods. For example, an NM standard which encouraged more sustainable and less fertiliser-reliant crop rotations, which incorporated livestock, would be more likely to result in additional public goods than simply encouraging shifting from inorganic fertilisers to slurry.

We would recommend that in the short-term additional actions for good nutrient management be integrated into the existing soils standards. Actions include:

- Soil testing and mapping
- Manure/organic matter testing
- Nutrient management planning, accompanied by access to appropriate training and advice

[2] https://www.sustainweb.org/news/feb21-alliance-elm-agroecology-paper/

In time, as a priority for this standard, an integrated whole-farm and holistic approach is needed to reduce nutrient losses to air, water and soils. An example of what that might look like in practice is reflected by agroecological farming systems, such as organic.

Moorland and rough grazing (intermediate & advanced)

General comments: The current 'issues and opportunities' identified for this standard should demonstrate that this standard is designed to support a step-change in moorland management, much of which is heavily depleted and in poor condition across England. Furthermore, current plans ('long list of actions') for this standard tend toward limiting damage, rather than providing additionality.

Key recommendations:

The ambition of the moorland and rough grazing standard should be increased through the following recommendations:

- Eligibility criteria should include scrub, trees, and wood pasture. These are natural components of moorland and rough grazing habitats.
- Within intermediate & advanced level, incentives to protect, maintain, restore, and expand habitats should be available.
- Natural regeneration/ planting native trees at low levels in appropriate areas.

Agroforestry

General comments: We support Defra's efforts to incorporate more trees into productive farmland, including the target for 10% of arable land to be converted to silvoarable systems. This should include a broad range of agroforestry systems with a particular focus on planting of non-productive native trees, which can deliver significant environmental benefit, including contributing towards net zero and biodiversity targets.

Agroforestry is defined as the "practice of deliberately integrating woody vegetation (trees or shrubs) with crop and/or animal systems to benefit from the resulting ecological and economic interactions".[3] Trees can be within fields (silvopastoral, silvoarable) or between fields (hedgerows, shelterbelts, and riparian buffer strips). Critically, agroforestry does not just cover the incorporation of productive trees that produce a commercial crop (e.g. fruit, nuts, or timber), it should also cover the integration of native trees to enhance environmental delivery. This includes the benefits to soil health and water management, climate adaption and mitigation as well as enhanced wildlife habitat.

[3] https://link.springer.com/article/10.1007/s10457-018-0261-3

Key recommendations:

1. Advice: in an English context, agroforestry is a relatively novel approach and many farmers have little experience of managing trees. ;investment in advice and guidance for farmers will therefore be critical in order to scale up the roll-out. The evidence review from the ongoing ELM Test on agroforestry highlights the importance of knowledge exchange, advice and training to encourage more farmers to take up agroforestry[4]. Therefore, we suggest the standard should enable some degree of advice provision. This could be via a qualified advisor, compulsory webinars as part of the standard, supporting demonstration farms to host workshops, or a learning voucher to enable farmers to source their own training.

2. Boundary agroforestry: Agroforestry between fields (e.g. boundary agroforestry such as hedgerows or shelterbelts) is a simple yet effective action that can be taken on any farm and could serve as an entry point for the majority of farmers. The ability to create optimal shelter belts should be part of the SFI standard. These shelterbelts are 5m wide and evidence shows that they maximise benefits (environmental and productivity) with minimal land loss. They currently fall outside of either CS or England Woodland Creation Offer (EWCO) funding. Defra are considering including shelterbelts in the LNR agroforestry options but as they are something that can be effective on any farm, they should be included in SFI as part of either the Agroforestry or Hedgerows standards.

3. Long-term agreements: these are essential to ensure carbon mitigation and biodiversity benefits are realised. Farmers require support for capital, establishment and management of trees. Long-term agreements will give farmers the confidence to commit and reduce the risk of trees being removed.

4. Application support: It is important to ensure that applicants are able to access appropriate support for their agroforestry proposals under both SFI and LNR through a single application process.

Integrated Pest Management

General comments: IPM should be integrated into a whole-farm and holistic approach, as reflected by agroecological farming systems, rather than in a siloed, standalone standard. However, the encouraged uptake of IPM through the SFI is important and is welcomed.

Link is pleased with the progress Defra has made so far in developing the IPM standard, and the latest version we have seen now incorporates many of our key recommendations. It is critical that this is reflected in the final version set live in 2023. It is also critical that the IPM standard is designed in tandem with the Farmland Biodiversity Standards to enable integration and avoid the creation of

[4] https://www.organicresearchcentre.com/wp-content/uploads/2021/06/ORC-2020_Policy-Brief_Agroforestry_barriers.pdf

administrative challenges such as controlling the provision of flower-rich habitats in two SFI standards.

Key recommendations:

1. Planning: the requirement for a detailed IPM plan which is a live document, used by the farmer and their advisor, to demonstrate whole-farm pest and disease management strategies, including how to make changes in the future when pesticides are used.
2. Training and knowledge transfer: ensure that farmers in the IPM standard continue to increase their understanding of IPM by, for example, attending webinars or visiting other farms who are already doing it.
3. Habitat creation: increasing invertebrate-rich habitat e.g. through field margins and in-field flower strips using seed mixes of diverse native plant species.
4. Ensure clarity on what will be paid for by the IPM standard, and what will be paid for in the farmland biodiversity standard.
5. Long crop rotations, with varying crop varieties (including within the same field) in order to ensure diversity both within field and across the farm.
6. Not using pre-emergent herbicides and reducing Highly Hazardous Pesticides to achieve quick wins in terms of reducing pesticide load.
7. Ending the use of synthetic insecticides in higher levels of the IPM standard.
8. Ensure that Defra take the opportunity to monitor pesticide use of farmers in this standard to measure impact of the actions taken on pesticide use, therefore linking to the aims of the NAP.

Hedgerows

General comments:

The ELM Outcomes document (January 2022)[5] states that ELM supports hedgerows and hedgerow trees in the farmed landscape but sets no specific target. We would like to see future statements of ELM outcomes include specific targets for hedgerows expansion:

- An interim target to extend hedgerows length by 20% by 2035[6]
- Achieve a 40% increase in hedgerows length by 2050[7]

[5] https://www.gov.uk/government/publications/environmental-land-management-schemes-outcomes

[6] CCC-Joint-Recommendations-2021-Report-to-Parliament.pdf (theccc.org.uk) Table A5 Agriculture and food

[7] A level of 30-40% increase was set out in the Committee on Climate Change, Land use: Reducing emissions and preparing for climate change, November 2018 Land-use-Reducing-emissions-and-preparing-for-climate-change-CCC-2018.pdf "The current length of hedgerows in the UK is around 120,000 hectares, and we assume increases of 30% - 40% by 2050. The lower bound corresponds to the level recorded in the 1984 Countryside Survey." p45

These would reflect the carbon storage potential of hedgerows and be in line with Committee on Climate Change recommendations. These targets would also go some way towards supporting Favourable Conservation Status (FCS) for hedgerows as identified by Natural England (NE), who recommend extension of the English network by 335,000km from 547,000km to 882,000km. NE confirm that evidence we have 'overwhelmingly' supports extension of hedgerows to support thriving biodiversity, including both generalist and threatened species. FCS status for hedgerows and their extension by 60% from current levels should be a long-term ELM goal.

Mature hedgerow trees are a key component of hedgerows and Natural England set increasing their presence in hedgerows as a parameter for achieving FCS. The SFI pilot standard currently supports an average of 1 tree per 400m to 200m to 100m (Introductory, Intermediate and Advanced levels respectively). The ambition for the SFI Hedgerow standard should be to increase average levels progressively: the entry-level should be raised to at least the current baseline of an average 1 tree per 300 metres and the advanced level to 1 per 40 metres[8]. Capital grant support for hedgerow tree planting should be clearly provided within SFI as a supplement to support tree planting where appropriate and beneficial.

This would help to reverse and address the historic ravages of Dutch Elm Disease and current threat of Ash Dieback as well as supporting the proposed Environment Act target to: 'Increase tree canopy and woodland cover from 14.5% to 17.5% of total land area in England by 2050.'[9]

Given the relative ubiquity of hedgerows and the need for them to be actively managed – Countryside Surveys reveal that the extent of hedgerows under management fell by 21% between 1984 and 2007 – as a broad scheme SFI will need to support effective management of hedgerows across the country as a whole. The scope and ambition of provisions in the SFI Pilot Hedgerow standard will need to be increased over time to achieve this.

Key recommendations:

Under SFI farmers should be properly recognised and rewarded for maintaining existing high-quality hedges. The ambition of the SFI 2023 standard should be to use linear payments to reward those achieving a minimum quality threshold (based on recognised quality attributes such as height and width, gappiness, base canopy height, presence of native species etc).

The current proposals for the SFI Hedgerow standard are focused on management of existing hedgerows. In order to meet the targets set out above on hedgerow length and meeting FCS, the standard should also support creation of new hedgerows and seek reward farmers for the condition of their hedgerows.

[8] One hedgerow tree per 40metres is an FCS parameter set by Natural England; it would mean an expansion of current hedgerow tree numbers from 1.6 million to 22 million. Staley, J.T., Wolton, R and Norton, L. , Definition of Favourable Conservation Status for Hedgerows Defining Favourable Conservation Status Project, Natural England, 2020, p5

[9] Defra, Consultation on environmental targets, 16 March 2022, p25

The SFI standard should reference and make eligible all the important structural components of hedgerows as habitats including: shrubs, trees, flower-rich and tussocky margins, banks and ditches. Consideration should also be given as to whether some forms of boundary agroforestry, such as optimal shelterbelts should be included in the SFI Hedgerows Standard or would be better placed in the Agroforestry Standard (see above).

As noted elsewhere, we understand targeted advice will not be included in the SFI standards. However, input from well-trained advisers is essential for good outcomes in hedgerow management. We recommend participants in the standard attend webinars, training and peer-to-peer learning workshops on farm as part of the offer for the standard.

In line with overarching principles set out above for SFI – specifically to ratchet up ambition over time and for SFI to move towards a whole farm approach over time – the hedgerow standard should support management of the hedgerow network on a farm/holding as a network to ensure hedgerows are well-connected to each other and to other appropriate habitat (copses, woodland, shelter belts etc). ELM scheme support must progress to incentivising whole management cycles of on-farm hedgerow networks so that the network is structurally diverse (in various stages of growth and management) to support biodiversity and nature recovery. The scheme should incorporate rejuvenation of hedges through laying and coppicing as standard.

Farmland Biodiversity standard

We strongly support the introduction of an SFI Farmland Biodiversity standard. If designed correctly to encourage farmers to manage at least 10% of their farm for nature this standard could make a big contribution to achieving the 2030 species abundance target. Encouraging farmers to manage land for nature can bring significant agronomic benefits too, helping to boost yields through encouraging beneficial wildlife, improved soil health, making use of non-productive areas, and reducing the need for pesticides and inorganic fertilisers.

Organic standard

General comments:

We welcome the Secretary of State's acknowledgement of the benefits that organic farming can offer to the wider environment, and his commitment to the implementation of a future organic standard, although it is currently unclear where this standard will be based. We hope to see the development of a holistic payment package that fairly rewards existing organic farmers for the public goods they provide, as well as supports those wishing to convert to organic systems.

In the meantime, the IPM standard should ensure that organic farmers are able to be rewarded in the highest level for the work on IPM and pesticide reduction/elimination that they are already doing.

Key recommendations:

- We recommend that Defra works closely with the organic sector moving forward, to ensure the organic standard's continuity, and requisite support for organic farmers.

- We would support a bundled set of measures from across the SFI to create the organic standard, as long as that standard fully recognises and pays for the public goods provided by whole-farm, organic systems.
- Current farmers under mid-tier and higher tier Countryside Stewardship agreements should be supported in transitioning to LNR agreements, to ensure that no public goods delivered by organic systems-and other high nature value farms- are lost in the transition.
- The organic standard should support and encourage whole-farm systems.

Grassland Habitats

General comments: (linked also to options for floodplains) Well managed, permanent grasslands can provide a range of public goods, including biodiversity conservation, pollination, air and water quality, carbon storage and flood alleviation. Huge swaths of species rich and wet grasslands and meadows were lost in the 20th Century. ELM should help maintain, restore and create permanent semi-natural grasslands.

Local Nature Recovery funding should not only focus on marginal and less productive farmland, as opportunities for nature-restoration exist also on productive farmland. This land need not to be taken out of production if management techniques are changed. For example, altered management of floodplains could increase their ability to prevent flooding of communities, whilst allowing for productive use, such as hay making and grazing.

We expect further detailed development of the ELM scheme to recognise that species-rich grassland can be either wet or dry, with different ecohydrological characteristics - and hence require different approaches to management and restoration. This should include support for sustainable farming practices, based on traditional hay cutting, grazing with minimal artificial inputs, building soils and fertility naturally, increasing surface roughness and reducing diffuse water pollution. This would, in addition, support the conservation of native livestock at no additional cost.

Key recommendations:

- Invest in mapping and survey of remaining areas of species rich and low/no input grassland.
- SFI should reward the maintenance of existing low/ no input grasslands (also known as unimproved or semi-improved).
- LNR should support appropriate management, restoration and creation of species-rich grasslands, wet grasslands (including areas for breeding waders and wildfowl) and floodplain meadows[10]. This may include rewarding hay cutting, low/no use of inputs, sensitive grazing, the creation and maintenance of foot drains and scrapes and water level management.

[10] Regarding floodplains. 25% of floodplain area needs to be low input grassland (which equates to almost 200,000 ha) within 25 years – this is based on our knowledge of restoration potential and the scale we believe is necessary for functionality; 70,000 ha of this area to be species-rich habitat in Favourable Conservation

Priorities for Local Nature Recovery Options

Wetland Habitats

General comments: Wetland habitats, as for rivers and streams, will benefit from a flexible outcome-focussed approach that embeds natural processes. Measures are required that support the restoration of natural hydrological, geomorphological and water quality regimes, delivering objectives for wetland habitats and their characteristic species.

Key recommendations:

1. Defra should develop appropriate evidence based options to support the creation and management of priority wetland habitats including headwaters, floodplains, and pond creation). (Components of this target need be reflected in other options e.g. floodplains, (wet) grassland).

2. Defra should also ensure options to rewiggle rivers to help restore natural hydrology, and reduce flashiness, as well as improve floodplain habitats.

3. Investment in LNR needs to be supported by enforcement of regulation to reduce water pollution (including diffuse pollution from agricultural sources). A failure to tackle pollution will undermine the public goods delivery from LNR.

Upland and Lowland Peat and Moorland

General comments: This covers a broad range of habitats, each of which require specific management and restoration actions; this needs to be clear within the option. For example, managing heather-dominated peatlands as moorland vegetation will contribute little to the recovery of degraded sites, which should be managed to re-establish sphagnum-dominated communities. The option also needs to make use of the data that will be gathered by those participating in the SFI moorlands standard; without this, paying land managers to gather this information will provide poor value for public money.

Key recommendations:

1. Upland habitats can deliver a range of environmental outcomes but are often economically marginal. Evidence demonstrates that reducing grazing pressure and switching from predominately sheep to include native cattle that rely on fewer inputs (e.g. fertiliser and vet meds) can improve farmland profitability whilst improving environmental delivery. Defra has a critical opportunity with the moorland SFI to support farmers to begin to make these changes, helping to improve environmental delivery whilst ensuring a safe and just agricultural transition for those farming in marginal areas.

Status - to deliver high-nature-value floodplains and to export nutrients from riverine systems in sufficient quantity to allow natural processes to recover.

2. Defra should ensure a full suite of ambitious options are available in the LNR to reward the maintenance, and restoration of upland habitats, including blanket bog, fen, wood pasture, and wooded cloughs. These options need to be flexible to enable careful tailoring to match local circumstances and maximise environmental delivery.

3. For lowland raised bogs in particular, options must support the restoration of drained and degraded peatland edges; without the restoration of this adjacent habitat, the hydrology and ecology of bogs cannot be recovered. Collaboration will also be critical here as the habitat resource is isolated and distributed across multiple holdings; facilitation funds should support join-up.

4. Defra should also evaluate investment in wet agricultural systems on lowland peatland to protect carbon stores.

5. The removal of inappropriate plantations on peat soils and moorland habitats, followed by site restoration, should be progressed given the water quality, carbon and biodiversity benefits that would be delivered.

Recovery and Reintroduction of Particular Wildlife Species

General comments: These options need to play a key role in supporting delivery of the legally-binding target to halt the decline of species by 2030. Species recovery options should be based on robust evidence, well targeted to known populations, with farmers supported by high quality advice. The recovery of cirl bunting in South Devon, provides a robust model for species recovery in ELM. In this example, practical, evidence-based measures, were targeted to the correct landscapes with advisers drumming up support for actions, whilst helping farmers to tailor them to their local context.

Defra should only fund species reintroductions when the IUCN thresholds are met. This is critical to maximise the likely success of a reintroduction. In addition, relevant habitat options must support the creation or enhancement of habitats that will enable reintroduced species to thrive. For example, levels of tolerance of beaver activity will be far greater if financial support mechanisms are available to make space for water - sufficient flexibility must be inbuilt in recognition that landowners will be working with unpredictable and dynamic natural processes

Key recommendations:

1. Develop a clear set of species priorities for recovery and reintroduction.

2. Use the best available evidence to develop a set of practical options.

3. Ensure these actions are carefully targeted to the right landscape (e.g. known species populations).

4. Invest in advice to drum up uptake and support farmers to integrate measures at the farm level.

5. Species recovery and reintroduction projects will require investment in a planning phase, to maximise success.

Trees and Woodlands (including agroforestry, traditional orchards and tree planting)

General comments:

The Government has proposed an ambitious target to increase tree canopy cover in England from 14.5% to 17.5% by 2050. ELM will be a key mechanism for achieving this. If done right, i.e. with the right tree in the right place, increased tree cover can make a significant contribution to achieving both net zero and the recovery of nature, and biodiversity should therefore be considered a primary driver under this theme alongside climate mitigation. Incorporating more trees into farms and the wider landscape can also provide multiple additional environmental benefits, e.g. reduced flood risk, improved water quality by reducing run-off, and improved air quality. Trees and woodlands can also provide further wellbeing benefits to people, especially where they are planted with a view to improving access for people.

Defra have confirmed that the England Woodland Creation Offer (EWCO) will be rolled into ELM from 2025, although further clarity is needed on how this will work. However, the options under the LNR Trees and Woodlands theme should not be limited to woodland creation and expansion; options under this theme should support trees outside woods, in particular ancient and veteran trees, as well as other wooded habitats such as wood pasture and parkland. Support should also be available for the management of existing woodlands, in particular for the restoration and management of ancient woodland and other long-established woodlands.

Key recommendations:

1. Options under this theme must not only focus on woodland creation. Need to also include options for woodland management and restoration, especially bringing ancient woodland into management, as well as options for trees outside woods, wood pasture and parkland, and agroforestry.
2. Should include support for protection and management of special trees, such as ancient and veteran trees - including advice, guidance and financial support.
3. We need more clarity on how England Woodland Creation Offer will be rolled into ELM from 2025.
4. Options for woodland expansion should support natural regeneration of woods/trees as well as planting.
5. Options may need to look beyond support for creation, restoration and management for woods and trees to include other options such as deer management. This would need to be offered at a landscape scale to be meaningful.

Nature-Based Solutions for Water

General comments:

A "Flood Zone 3" Geographic Information System (GIS) layer is already available on Gov.co.uk; it was used to construct the maps within the Wetland Vision for England, which were endorsed by Defra. Using this layer allows catchment-planning mechanisms to identify local targets to reduce flooding through natural flood-management measures, improve water quality and deliver biodiversity.

The option should promote solutions which benefit water quality (dealing with pollutants from agricultural or other sources), as well as water quantity (both flooding and drought), and should be broad in nature, by including actions that are in-river, on margins, in floodplains and across wider holdings.

Trees can also play an important role in this theme e.g. by helping to prevent surface run-off and diffuse pollution; supporting natural flood management; and by improving the micro-climate (e.g. shade for cooling) for invertebrates and fish. Any overlap or conflicts with the Trees & Woodlands option must therefore be managed.

Key recommendations:

1. Nature-based Solutions (NbS) provide practical, natural solutions to address societal challenges, such as climate change and flood risk - yet, not all deliver appropriate benefits for biodiversity whilst doing so. The option should favour NbS that have natural ecosystem function as a key characteristic, in order to contribute to nature's recovery alongside delivering against societal needs. Planning NbS that align with LNRS priorities will help to secure this.
2. In addition to more 'typical' actions likely to form a core part of a NbS for a water option (e.g. in-channel natural flood management features), the option should *also* include:
    - A 'tackle at source' principle - for example favouring solutions which reduce runoff, rather than trap runoff.
    - The removal of activities which undermine natural hydrological function, e.g. drainage.
    - Land management measures to increase infiltration - supporting river base flows, reducing drought impacts, and reducing runoff risk.

Restoring Rivers, Flood Plains, Streams and Riparian Habitats

General comments: Given the importance of water quality and water quantity to a healthy functioning water environment this option will need to work in tandem with the standard for nutrient management and options for NbS.

A narrow focus on river channels and on particular waterbodies fails to cater well for freshwater biodiversity which resides across a plethora of headwater streams, wet flushes, ponds, ditches and other wet habitats. Actions in this standard must move away from that past, narrow focus and encompass a full range of habitat types / features, embedding connectivity and natural function.

Key recommendations:

Focus on measures that support the extent, condition and connectivity of nature-rich freshwater and wetland habitats; to include targeted wetland creation, protection of sites of freshwater biodiversity importance, management of INNS, and in-channel and with-floodplain connectivity. For example:

1. Ensure options support the restoration of natural processes. The dynamic nature of natural processes will require a highly flexible scheme with considerable advisor support.
2. Support the establishment of permanent riparian buffers / wildlife corridors of at least 20 metres along all rivers in England. This can be achieved by:
    - Establishing a permanent 6 metre6 metre regulatory baseline buffer along all rivers.
    - Including incentives to extend these buffers in 6 metre increments to reflect local circumstances in order to support long term land use change from intensively farmed land to woodlands, wetlands, heathland, conservation grassland and floodplain meadows
    - Support the establishment of key capital works where required such as fencing, water troughs & access
    - Providing incentives for the control and management of Invasive non-native species
    - Provide incentives for farmer lead water quality monitoring on phosphates and nitrates using consistent recognised methods and reporting
    - Enabling the stacking of various offset type credits (carbon, BNG, Nutrient Neutrality) to supplement (as opposed to substitution) of ELMs payments.
3. Include specific options for wider floodplain reconnection and restoration of floodplain meadows
4. Floodplains should be included as a specific land-category within the Environmental Land Management Scheme where land-use change (e.g., from arable cultivation to permanent grassland) is often needed to maximise environmental benefits and public goods
5. Introduction of spatial targets for the restoration of functional floodplain habitats, for examples the creation or restoration of at least 250,000 ha. of priority wetland habitat with a strong focus on habitat creation in river valleys (headwaters, floodplains, and pond creation).

Other themes

Access and Engagement

General comments: ELM could deliver significant public benefits, including public health and wellbeing and connection to high-quality nature. For example, Evidence from the Kent Downs AONB Test and Trial suggests that the farming community strongly supports being given an option, through ELM, to receive financial assistance for the provision of new access, or for the enhancement of existing routes to make them more accessible[11]. As set out below, some interventions would be relatively straightforward to implement while others will be more complex as part of landscape-scale change across multiple landholdings.

Sustainable Farming Incentive

SFI payments and capital grants for public access should be available for farmers to improve existing public rights of way across their land (beyond the legal requirements) including the following:

1. Improve existing public rights of way and access to water with payments for:
2. Improved path surfaces and widths. - Improved or removed access infrastructure (gates and stiles, launches and landings) to the least restrictive option. - Waymarking and signage.
3. Blue corridors, allowing both nature to thrive and recreational users to safely portage round dangerous obstacles or natural hazards.
4. Provision for more permissive access routes to water

Local Nature Recovery

Farmers and land managers choosing to participate should be provided with financial assistance in return for creation of new access rights (either permissive – a temporary long-term agreement – or permanent, the latter being preferable) where access routes can be managed in a way that is of mutual benefit to recreation and conservation.

This could include new routes which:

1. Create links between existing routes / circular walks, including at the urban/rural fringe.
2. Offer safer alternatives to busy country roads.
3. Provide links to otherwise inaccessible open access land and the England Coast Path.
4. Facilitate access to water for launching and landing and providing additional waterside facilities such as parking, changing or wash down facilities.
5. Offer new access as part of other environmental improvements being undertaken through ELM, delivering multifunctional landscapes with high nature value and generating a greater return on investment.

[11] https://www.kentdowns.org.uk/our-projects/environmental-land-management-scheme/enhancing-access-opportunities/

Annex: Defra LNR and SFI engagement- Link member organisation practitioners and experts

Sustainable Farming Incentive	
Standard	**Suggested name/organisation**
Nutrient Management	Tom Stuart, Senior Policy Advisor, WWF-UK Ali Morse, Water Policy Manager, The Wildlife Trusts Jenny Hawley, Policy Manager, Plantlife Caroline Corsie, Senior Land Advisor at Worcestershire Wildlife Trust and Farm Alex Mackaness, Policy and Public Affairs Advisor, Soil Association
Moorland and rough grazing (intermediate & advanced)	Christopher Price, CEO, RBST Geth Davies, Senior Agricultural Adviser (and farmer), RSPB Peter Leeson, Woodland Creation Advisor at The Woodland Trust, Woodland Trust
Agroforestry	Helen Chesshire, Senior Advisor Farming, Woodland Trust Sophie Mott, Carbon Farming Project Manager, RSPB Stuart Holm, Outreach Manager, Woodland Trust Tim Bevan, Senior Wildlife and Farming Manager at Gloucestershire Wildlife Trust Clive Thomas, Senior Policy Advisor (Forestry), Soil Association

Integrated Pest Management	Steph Morren, Senior Policy Officer (Pesticides), RSPB Lucy Bates, Nature Recovery Champion at Wiltshire Wildlife Trust Louise Payton, Senior Policy officer (farming), Soil Association
Hedgerows	Graeme Willis, Agricultural lead, CPRE Georgie Bray, Hope Farm Manger, RSPB Caroline Corsie*, Senior Land Advisor at Worcestershire Wildlife Trust and Farm
Organic Standard	Adrian Steele, Organic Sector Development Advisor, Soil Association
Local Nature Recovery	
Option	**Suggested name/organisation**
Wildlife on arable farms	Richard Winspear, Head of Technical Advice, RSPB

Grassland habitats	Jenny Hawley, Policy Manager, Plantlife Olivia Nelson, Floodplain Meadows Partnership Advocacy Manager, Floodplain Meadows Partnership Darryl Cox, Senior Science and Policy Officer, Bumblebee Conservation Tim Bevan, Senior Wildlife and Farming Manager at Gloucestershire Wildlife Trust
Wetland habitats	Olivia Nelson, Floodplain Meadows Partnership Advocacy Manager, Floodplain Meadows Partnership Malcolm Ausden, Principle Ecologist, RSPB Tammy Smalley, Head of Conservation at Lincolnshire Wildlife Trust
Lowland heathland/peat	Heathland – Nigel Symes, Business Advice Leader, RSPB or Dante Munns, Dorset Senior Site Manager, RSPB
Coastal habitats	Olivia Nelson, Floodplain Meadows Partnership Advocacy Manager, Floodplain Meadows Partnership
Upland and lowland peat and moorland	Kate Hanley, Dove Stone Site Manager, RSPB (upland) Dr. Olly Watts, Senior Climate Change Policy Officer, RSPB (Lowland) Peter Leeson, Woodland Creation Advisor at The Woodland Trust, Woodland Trust
Recovery and reintroduction of particular wildlife species	Mike Shurmer, Senior Conservation Officer, RSPB

Trees and woodlands, including agroforestry, traditional orchards and tree planting	Emily Hunter, Woodland Trust Vanessa Burton, WT (woodland creation) Emma Gilmartin, WT (ancient & veteran trees and wood pasture) Al Hotchkiss, WT (woodland restoration) Steve Oram, Orchard Biodiversity Officer, PTES Tim Bevan, Senior Wildlife and Farming Manager at Gloucestershire Wildlife Trust Clive Thomas, Senior Policy Advisor (Forestry), Soil Association
Nature-based solutions for water	Ali Morse, Water Policy Manager, The Wildlife Trusts Tammy Smalley, Head of Conservation at Lincolnshire Wildlife Trust Arlin Rickard, Chair, The Rivers Trust Alex Adam, Head of Water Stewardship, The Rivers Trust Tammy Smalley, Head of Conservation at Lincolnshire Wildlife Trust
Restoring rivers, flood plains, streams and riparian habitats	Olivia Nelson, Floodplain Meadows Partnership Advocacy Manager, Floodplain Meadows Partnership Arlin Rickard, Chair, The Rivers Trust Alex Adam, HeadHead of Water Stewardship, The Rivers Trust Lee Scofield Senior Site Manager at RSPB Haweswater

Other themes	
Access and engagement	Stephen Russell, Policy and Advocacy Officer, Ramblers Kate Ashbrook, General Secretary, Open Spaces Society Ben Seal, Head of Access and Environment, British Canoeing Cath Flitcroft, Access and Conservation Officer, BMC

This briefing is supported by the following Link members:

A Rocha

Amphibian and Reptile Conservation

British Canoeing

British Ecological Society

British Mountaineering Council

Bumblebee Conservation Trust

Butterfly Conservation

CPRE the countryside charity

Floodplain Meadows Partnership

People's Trust for Endangered Species

Plantlife

Ramblers

Rare Breeds Survival Trust

Rewilding Britain

RSPB

Soil Association

The Wildlife Trusts

Woodland Trust

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