

Defra consultation on the implementation of CAP Reform in England

A response by Wildlife and Countryside Link

1. Introduction

Wildlife and Countryside Link (Link) brings together 42 voluntary organisations concerned with the conservation and protection of wildlife, countryside and the marine environment. Our members practise and advocate environmentally sensitive land management, and encourage respect for and enjoyment of natural landscapes and features, the historic and marine environment and biodiversity. Taken together our members have the support of over eight million people in the UK and manage over 750,000 hectares of land.

Link welcomes the opportunity to respond to this consultation and contribute to the informal discussions with Defra that have been on-going throughout the year. However, we are disappointed that the consultation was severely delayed therefore only allowing for a short consultation period, which is completely inadequate for such a detailed consultation. Due to this, we have focused on answering the questions which have the very greatest relevance for the natural environment. These three areas are:

- Modulate the maximum 15% from Pillar I into Pillar II;
- Prioritise agri-environment schemes in the next Rural Development Programme for England (RDPE) and;
- Take an ambitious approach to Pillar I greening requirements, via a National Certification Scheme (NCS).

We would like to note that modulating the maximum 15% and prioritising agri-environment schemes equate to Scenario 6, as outlined in Defra's Impact Assessment of the consultation.

This response is supported by the following 19 organisations:

- Amphibian and Reptile Conservation
- Buglife – The Invertebrate Conservation Trust
- Bumblebee Conservation Trust
- Butterfly Conservation
- Campaign to Protect Rural England
- Council for British Archaeology
- Friends of the Earth England
- Freshwater Habitats Trust
- National Trust
- The Mammal Society
- Open Spaces Society
- Plantlife
- The Rivers Trust
- Royal Society for the Protection of Birds
- Salmon & Trout Association
- Wildfowl & Wetlands Trust
- The Wildlife Trusts
- Woodland Trust
- WWF -UK

2. Inter-pillar transfers

Should we transfer funding from Pillar 1 to Pillar 2?

Yes, Link fully supports a transfer of funding from Pillar 1 to Pillar 2 and agrees with Defra that *rewarding farmers for the environmental goods that they provide is a much better use of taxpayers' money than providing a direct subsidy*.¹ This is the most effective way of realising better value for money from the public's investment in the CAP. In England, public investment in farming is approximately £2 billion per year,² with the majority going to direct payments which is an extremely poor use of public money.

If so, should we transfer the maximum 15% or less?

If less, what should the Rural Development Programme fund less as a result?

- **Environmental land management**
- **Rural economic growth**
- **Farming and forestry competitiveness and productivity**
- **Other, please specify**

To ensure that farmers are fully rewarded for delivering public goods, Link believes that Defra must transfer the maximum 15% from Pillar 1 to Pillar 2. 15% modulation would help to rebalance the UK's disproportionately low Pillar 2 allocation and would ensure existing agri-environment commitments are honoured and new agreements can be offered during the 2014-2020 period.

We agree with Defra that *the costs of transferring funding from Pillar 1 are very small in comparison to the benefits*³. Defra's own evidence clearly shows that *Scenario 6: more environmental land management focus* presents the best possible option for the Government, farmers and the environment. Scenario 6 has the highest net present value and we would fully expect Defra to implement this, especially as their own evidence is so strongly in support. Defra's own calculations show that the benefits far outweigh the costs⁴ and funding agri-environment would itself lead to sustainable rural economic growth, competitiveness and productivity.

The Government has also committed to delivering *Biodiversity 2020* and the Water Framework Directive (WFD), and has selected agri-environment schemes as the key delivery mechanism to do so. However, agri-environment measures that are related to addressing water quality issues should not be supporting actions that can be delivered through good business practice. With regard to WFD, we urge Defra to prioritise multi-benefit approaches to secure Good Ecological Status of England's water bodies alongside biodiversity delivery. The evidence that Defra presents makes it clear that even with 15% modulation, *Biodiversity 2020* and the WFD commitments alone are well in excess of the maximum possible funding. Not only that, but by Defra's own admission, their ambition for New Environment Land Management Schemes (NELMS) would be greatly reduced with a 9% transfer and Link would be extremely disappointed if Defra went against their own evidence.

¹ P54 point 6.2 of consultation document

² <https://www.gov.uk/government/publications/agriculture-in-the-united-kingdom-2011>

³ P18, point 3 and see Table 5 of Evidence Paper

⁴ P44 Impact Assessment, p86 consultation document.

The Natural Capital Committee report also recommends that the Government's efforts to reform the CAP be intensified, with a long-term view to phasing out Pillar 1 support and moving subsidies towards Pillar 2 and the provision of environmental public goods. In the short-term, securing as much flexibility as possible in how funding can be allocated for the period 2014-2020 and taking full advantage of this when shaping domestic schemes, is essential.⁵

The final EU result from this round of CAP reform was extremely disheartening and this is not the progressive CAP that is required to protect and enhance the environment, and in turn protect the long-term future of farming. This Government, which was one of the few progressive voices in CAP negotiations, needs to ensure they mitigate this exceptionally poor CAP deal by modulating the maximum they can into Pillar 2. Without such a transfer Defra will not achieve the ambitions of *Biodiversity 2020* and will fatally undermine the progress that has been made through agri-environment schemes over the last two decades in England, including the significant buy-in from many sections of the farming community.

RDP funding can improve the rural environment, improve the competitiveness of the farming sector and productivity of the forestry sector, support growth in the rural economy, and strengthen rural communities.

- **What priorities should we spend RDP funding on?**

The next round of RDP funding should prioritise spending on agri-environment schemes, currently referred to as NELMS. As previously noted the scale of need far exceeds the available funding for biodiversity and water quality objectives alone, and therefore there is sound justification for expending the majority of Pillar 2 funds on NELMS in the next programme.

We believe that prioritising the environment is an essential part of the shift towards more sustainable farming in England and will also enhance competitiveness by encouraging more diverse and resilient farming methods. Whilst we recognise that farming is in a unique position, this is because of the vital public goods that it can and should provide.

What proportion of RDP spend should we apply to:

- **Environment — agri-environment and forestry**
- **Farming competitiveness and forestry productivity**
- **Growth Programme**
- **LEADER**

Please explain your reasoning.

From the four scenarios that are presented in the consultation document, Link strongly supports 'Scenario 6': the increased focus on environmental outcomes, increasing agri-environment to 88% of the RDPE⁶. As stated in Table 9, this would be an increase of 5% from the balance as now. The 88% total however, is the average across the programme, masking a high degree of variability between years, with the proportion dedicated to the environment ending at 81% in 2020/21 according to the profile outlined in Annex B of the consultation document. This means that only the environment focused scenario will leave environmental spending for 2020 at similar levels to now. Maintenance of current levels of

⁵ Natural Capital Committee's first State of Natural Capital Report - *The State of Natural Capital: Towards a framework for measurement and valuation*. April 2013.

⁶ P60, table 9 of consultation document.

spending on agri-environment is needed at the very least if many of the Government's commitments are to be met by the end of the decade.

The 15% growth/competitiveness focus, or any of those with a 9% transfer would lead to a reduction in spending on the environment. For instance, the difference in funding for the environment between a 15% transfer and environment focus relative to a 15% transfer and growth focus is £388 million across the programme. The disparity between the environment, balance as now and growth scenarios is outlined in more depth in Table 1 below. Furthermore, Defra's Impact Assessment supports an increased environmental focus as opposed to the other options in terms of the net benefits provided.

| Table 1 - Percentage and £m spent on agri-environment and forestry commitments 2014-2020 | | | | | | | | | |
|---|-----------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|----------------|
| Scenario | | 14/15 | 15/16 | 16/17 | 17/18 | 18/19 | 19/20 | 20/21 | Average |
| 15% transfer/environment focus | £m | 481 | 527 | 505 | 490 | 477 | 470 | 459 | 487 |
| | % | 96 | 94 | 90 | 87 | 85 | 83 | 81 | 88 |
| 15% transfer/balance as now | £m | 475 | 512 | 482 | 459 | 442 | 431 | 415 | 459 |
| | % | 96 | 91 | 86 | 82 | 78 | 77 | 74 | 83 |
| 15% transfer/growth focus | £m | 468 | 496 | 458 | 429 | 406 | 392 | 371 | 431 |
| | % | 94 | 88 | 82 | 76 | 72 | 70 | 66 | 78 |
| 9% transfer/environment focus | £m | 476 | 443 | 415 | 394 | 377 | 366 | 351 | 403 |
| | % | 96 | 98 | 92 | 87 | 84 | 81 | 78 | 88 |
| 9% transfer/balance as now | £m | 467 | 440 | 400 | 369 | 346 | 331 | 309 | 380 |
| | % | 94 | 97 | 89 | 82 | 77 | 73 | 69 | 83 |
| 9% transfer/growth focus | £m | 459 | 436 | 386 | 345 | 315 | 295 | 267 | 358 |
| | % | 92 | 96 | 86 | 76 | 70 | 66 | 59 | 78 |

Given the clear market failure to reward the provision of environmental public goods, and the continued and significant challenges facing the natural environment (as outlined in the State of Nature⁷ report) it is essential that Defra chooses to implement the increased environmental focus scenario.

As well as doing the most to address Government's environmental commitments, the combination of 15% modulation and increased environmental focus provides the best value for public money and is best aligned with Government's stated approach of using public funding to address market failure and secure environmental public goods.

⁷ http://www.rspb.org.uk/Images/stateofnature_tcm9-345839.pdf

3. Direct Payments: greening

Decision: The Government has decided that the broad approach to greening in England should be to adhere closely to the measures set out in the direct payments Regulation.

The Government is not minded to take up the option to implement greening through a National Certification Scheme containing additional, equivalent measures. Do you agree with this approach or do you see a case for a National Certification Scheme and, if so, on what grounds?

No, we do not agree. Link believes that the best option to implement greening in England is via an ambitious National Certification Scheme (NCS) which would demonstrate that the Government was maximising the opportunities to invest in the long-term sustainability of farming.

Greening should implement measures that help England's varied farming systems address their particular environmental challenges. Existing certification schemes and assurance standards should not be considered due to the compliance issues (many are focused on production methods rather than environmental outcomes) with associated disallowance risks.

A NCS would also provide a means to understanding the benefits of greening to pollinators. Monitoring delivery could be done very effectively and this would show how it contributes to the new pollinator strategy as well as integrating with other schemes such as Campaign for the Farmed Environment (CFE).

A NCS approach would also allow Defra to include land management options that protect and enhance upland landscapes, many of which remain in unfavourable condition due to inappropriate grazing levels. This is urgently needed and will provide an important environmental safeguard, along with basic cross-compliance requirements, to the proposed increase in Pillar 1 funding for Severely Disadvantaged Areas (SDA) and SDA-moorland areas.

We suggest that the CFE's 8 point plan for arable environmental management⁸ be used as a basis for establishing a NCS for arable areas, as many of these provisions could also contribute to the protection of important archaeological sites in arable areas, and to the conservation of historic boundaries:

- Look after established wildlife habitats
- Maximise the value of your field boundaries.
- Create a network of grass margins
- Establish flower rich habitats
- Provide winter food for birds
- Use of spring cropping or in-field measures to help ground-nesting birds
- Use winter cover crops to protect water.
- Establish in-field grass areas to reduce soil erosion and run-off

⁸ <http://www.cfeonline.org.uk/campaign-themes/arable/>

To ensure continuous improvement and effectiveness, there needs to be an adequate and comprehensive programme of monitoring for greening, regardless of the approach adopted. This will be essential to assess the impact greening measures have had, and improve their effectiveness, and therefore value for money, over the course of the next CAP period. Specifically, a NCS would allow for this kind of iterative improvement.

Do you agree that this approach to the implementation of greening in England strikes the right balance between environmental benefit and administrative cost in the context of our approach to the CAP Reform package as a whole?

We do not agree that Defra's greening proposals offer the right balance between environmental benefit and administrative cost. We believe they propose very little in the way of environmental benefit as their main focus is minimising administrative cost.

Making available the full list of proposed Ecological Focus Area (EFA) options would enable the EFA requirement to be met without the need for additional action. However individual EFA options may realise differing levels of environmental benefit. Which selection of Ecological Focus Area options do you favour?

We acknowledge that greening can and must play an important role in increasing the value for money from the public spending in Pillar 1. The greening payment will constitute one third of the Pillar 1 budget - approximately £495 million in England each year alone.⁹ This amount of money could deliver substantial environmental benefits if it is tied to meaningful environmental measures, if not, it will achieve little more than greenwash. This will be a waste of taxpayers' money as they will be forced to pay for the real cost of farming in other ways, for example through water company bills.

There are certain principles that must be adhered to when implementing greening. Link will only support an approach that rewards the provision of non-marketable environmental public goods and requires all farmers to play their part: there must be no exemptions from greening that are not justified on the basis of sound environmental evidence.

As outlined in the consultation document, Link believes that the following land-use types should count towards fulfilling the 5% EFA requirement. This and the following list (annex 6a) would deliver significant benefits for both the natural and historic environment:

- Land laying fallow
- Terraces (if and where applicable in an English context)
- Landscape features including ancient trees and dry stone walls,
- Buffer strips
- Supported agro forestry
- Uncultivated land along forest edge
- Afforested areas established under rural development schemes

However we do not believe the land-use types set out in the consultation document fully cover a potential EFA designation. We believe that Defra should also examine those

⁹ Based on 30% of the anticipated Pillar I allocation for England

featured in Annex 6a of the Direct Payment Regulations for Member States to choose if implementing a NCS. Link's preferences are:

1. Ecological set-aside.
2. Creation of "buffer zones" for high nature value areas, natura 2000 or other biodiversity protection sites, including along hedgerows and water courses.
3. Management of uncultivated buffer strips and field margins (cutting regime, , no use of pesticides, no disposal of manure and/or mineral fertilizers), no irrigation, no soil sealing.
4. Borders, in-field strips and patches managed for wildlife/ specific fauna (herbaceous border, protection of nests, unharvested crops).
5. Management (pruning, trimming, dates, methods, restoration) of landscape features (trees, hedgerows, riparian woody vegetation, stone walls (terraces), ditches, ponds).
6. Keeping arable peaty/ wet soils under grass (with no use of fertilisers and no use of plant protection products).
8. Conversion of arable land into extensively managed permanent grassland

Whilst the direct application of these may not be appropriate given the obvious overlap that exists between them, they provide a good guide as to the additional flexibility and potential effectiveness that a NCS could offer.

Link categorically rejects the inclusion of nitrogen-fixing crops and as an eligible EFA land use type as they provide extremely limited biodiversity benefit across the course of a farming year. As recently as 2010, nitrogen fixing crops comprised 4.5% of the croppable area, suggesting that their inclusion as eligible for EFAs would render the measure essentially redundant in terms of the benefits that it could deliver. Such crops should only be able to contribute to a farmer's greening requirements via crop diversification.

There is a particular interest to see benefits for pollinators arising from the implementation of greening. Are there any practical Ecological Focus Area options or enhancements of these options which could be easily adopted have a high likelihood of uptake and which would be particularly beneficial for pollinators? Would these options be deliverable within the approach set out in the direct payments Regulation or would they need to be implemented through a National Certification Scheme?

The relevant EFA options are: fallow land, uncultivated land along forest edge, landscape features and buffer strips. There would need to be habitat enhancements to these options to make them effective for pollinators including pollen and nectar sources (trees, shrubs and wildflowers), nesting sites, shelter and appropriate management to sustain these components, something that we believe only possible if Defra were to adopt a NCS as their approach to greening. Nesting, shelter and food could be combined and delivered through the suggested options. Advice, support and monitoring would be needed to understand the benefits to pollinators and allow future improvements to greening to benefit pollinators which would also be best delivered through a NCS.

Although Natural England are working to develop a pollinator package for inclusion in NELMS, the proposed coverage and budget of the scheme will be insufficient to meet the

needs of widespread pollinator species. A NCS is therefore essential if Defra are to meet their stated ambition to make greening work for pollinators, and help them to deliver their National Pollinator Strategy.

4. The Role of NELMS

What lessons can be learned from the current Rural Development Programme? How can we build upon its successes?

Link welcomes Defra’s intention to make NELMS more targeted, focused and ambitious and this is fully in keeping with the leadership role England has played in the development of agri-environment schemes over the last 25 years. There are several key lessons to be learnt from Environmental Stewardship, particularly the need to ensure each agreement contains the right package of land management options to deliver the intended environmental outcomes, particularly in support of priority habitats and species (Section 41 of the NERC Act 2006).

A review of the lessons learned from the current scheme and its predecessors shows that environmental land management schemes can be effective policy instruments, but that good scheme design and high quality delivery is essential if their potential is to be fulfilled. The evidence suggests that cost-effective delivery requires a number of things. High quality advice from experienced and knowledgeable advisers, such as Natural England and English Heritage, is essential, as is effective targeting, routine monitoring and a robust evidence base if schemes are to produce optimal outcomes. Benefits for the historic environment can also be achieved by ensuring accurate information is available on priority sites and areas for conservation and it will be essential to draw on these sources of expertise in designing and delivering the new scheme.

Are there any key areas we have missed in our assessment of need to support the new Rural Development Programme? Are there any further sources of evidence of social economic and environmental need in rural areas for England that have not been captured?

In the UK, High Nature Value (HNV) farming – which makes a particularly high contribution to the provision of environmental public goods - is mainly associated with low-intensity livestock systems, largely found in the uplands. Despite the environmental benefits many such systems deliver, maintaining, or even reaching economic profitability remains a challenge.

Although we are open to changes in CAP payment approaches which would uplift financial support to upland farmers, these need to be payments that are linked to environmental public goods delivery and not simply a blanket payment which could perversely lead to negative environmental impacts e.g. intensification of in-bye land and under grazing of hill areas. Focusing direct payments on farms that are considered to be of High Nature Value could go a long way to supporting traditional farming systems that also preserve our wildlife and landscape features. For this to be effective this must be explicitly linked to public goods delivery. This support should be available for all farms that contribute to the three types of high value nature farming and not restricted to upland areas. In addition, NELMS design must ensure that appropriate uplands management options and payment rates are available

to encourage the uptake of additional positive management over and above that required by Pillar I requirements. It is essential that experienced and knowledgeable advisors are kept in post long enough to form trusted relationships with farmers as this increases effectiveness.

Link therefore urges Defra to consider the particular challenges facing HNV systems in England as part of its revised SWOT analysis, and to develop a coherent package of support.

Are the areas we outline for support under the new Rural Development Programme set out above the right ones? How we can best target investment under the new Rural Development Programme to help gain the maximum value for money for UK taxpayers?

We would like to reiterate, that when prioritising investment through the RDP, we believe that the environment should be the most important factor when determining areas for support. This includes prioritising biodiversity and in particular habitats and species of conservation concern as described under Section 41 of the NERC Act 2006. The environment underpins growth and it is impossible to have growth without a sustainable environment. Conclusions from the Natural Capital Committee¹⁰ note that natural capital is good for growth:

- There is no inherent incompatibility between preserving and enhancing natural capital and economic growth, as long as growth is properly measured.
- The proper integration of natural capital into decision making at all levels is crucial to supporting and promoting future growth. This requires that natural capital is incorporated into national and corporate accounts as well as into project appraisal.
- In order to promote sustainable growth, all forms of capital (natural, human, social and manufactured) need to be properly maintained and where appropriate, enhanced. Only in this way will future generations be able to enjoy the opportunities that we do now.

How might we make the process for applying for Rural Development funding simpler or less bureaucratic? How might this be balanced against the need to ensure clear accountability for public funds?

As noted earlier, Link strongly believes that taxpayers' money should be spent on securing environmental public goods and, in many cases complex environmental challenges necessitate complex land management responses.

Therefore, whilst Link is supportive of simple and streamlined application process for agri-environment schemes, this must not translate into a watering down of the quality, and ambition, of the schemes themselves.

What are your views on the structure of the proposed new environmental land management scheme in particular the new "landscape scale" approach?

Link welcomes the introduction of a landscape scale approach in NELMS but this should not be regarded as a separate 'tier' rather it should be integral to the entire scheme. Landscape

¹⁰ Natural Capital Committee's first State of Natural Capital Report - *The State of Natural Capital: Towards a framework for measurement and valuation*. April 2013.

scale approaches would provide benefits for biodiversity, water and landscape character. They should build on and learn from existing landscape scale schemes such as The Wildlife Trusts Living Landscapes, the RSPB's Futurescapes, Nature Improvement Areas, Defra's Catchment Based Approach and also take note of initiatives used in other EU countries like Important Plant Areas, Important Butterfly Areas and Important Bird Areas.

We also welcome the intention to combine farming and forestry measures within one scheme which would remove the artificial separation that has been forced on land managers and offer similar opportunities to all.

However, we have some concerns that the upper tier's focus seems to be restricted primarily to SSSIs. Whilst SSSIs are of critical importance, there are a number of sites of importance for species such as invertebrates that are not well captured by the SSSI network. We therefore believe that other designations such as Local Wildlife Sites, and sites where a protected/ priority species is known to occur but does not have a specific designation, should also be included, alongside other areas of undesignated priority habitat.

We acknowledge the need for options to deliver multiple environmental outcomes and believe that in targeting for biodiversity the cultural ecosystem services related to landscape character, for example hedgerows,¹¹ should also be clearly recognised. The historic character of the landscape and the rich diversity of archaeological sites and historic buildings in the countryside will also need to be recognised in the new scheme.

We still have some concerns that the restoration and enhancement of landscape features seems to have been deprioritised in the new scheme and it gets little mention in the section of the consultation on NELMS (pages 41-46). Historic environment features and access measures in general also get very little mention, and while Defra has recognised the importance of scheduled monuments in NELMS, we believe a broader range of archaeological sites should be included.

With a much reduced agri-environment budget and the withdrawal of the Entry Level Scheme (including Uplands Entry Level Scheme) a basic level of maintenance and management of hedgerows and other landscape features is likely to be heavily reliant on the effective implementation of greening measures in Pillar I, increasing the importance of Defra opting for a NCS as described previously. Greening needs to complement the key components of NELMS, such as buffer strips. This will ensure the most effective delivery for the environment, including pollinators is through NELMS rather than greening. However, we do understand the budgetary constraints, and therefore it is imperative that every possible opportunity be taken to maximise the value of greening measures across the farmed landscape.

This is particularly important as the withdrawal of ELS means the area of agricultural land under some form of agri-environment scheme is expected to fall from 70% to around 35-40%. Additionally, the financial commitment for existing ES agreements and need to prioritise priority wildlife and archaeological sites in the higher level suggests there will be a relatively limited budget for new agri-environment agreements in the middle 'Area based'

¹¹ Hedgerows are a prime example of a landscape feature that does precisely this. The Land Use Consultants report (2009) on the provision of ecosystem services from Environmental Stewardship stated that hedgerows deliver 21 different ecosystem services.

tier. This means there will be even less available for the small scale capital grants scheme that the consultation states would be made available for hedgerow restoration/planting and maintaining dry stone walls.

Link's paper *New Environmental Land Management Schemes: A shared approach from Wildlife and Countryside Link* presented to Defra in January 2013 outlined a clear intervention logic for NELMS based on evidence for effectiveness, strength of commitment and scale of need, and opportunity and value for money. Although the intervention logic to secure better water quality is less obvious, it is important that water quality measures in Pillar 2 build upon basic good business practice and are primarily focused on securing biodiversity benefits such as implementing treatment wetlands. This is not reflected in the consultation.

We therefore do not feel that the effective marginalisation of landscape and historic environment by Defra's unwillingness to use other tools such as regulation to address water quality is justifiable given the potential implications for these two important objectives. We urge Defra to assess the intervention logic that they have adopted, in order to ensure that biodiversity, landscape and the historic environment are adequately addressed as scheme priorities.

Do you agree that we should not be prescriptive about how groups of farmers or land managers could be brought together to deliver landscape scale agreements under the proposed new environmental land management scheme? How could we help facilitate landscape scale approaches under the proposed new environmental land management scheme?

We agree that it should not be too prescriptive, but we do think that it would be essential to have guidance or advice that farmers and land managers could follow, which could be an effective way to ensure good delivery. This would need to be incentivised or facilitated in some way, as it is unlikely to happen naturally if just seen as a request.

We believe that an approach that combines target areas with target themes would provide the greatest level of benefit, an approach that has been used to date with HLS. Landscape scale approaches could be facilitated, via clearly defined targeting with hard boundaries that function at a landscape level and link key sites for habitats and species, thus allowing their expansion and movement. These systems are proving to be increasingly effective with scientific evidence to support them, for example B-Lines.¹²

Should we offer a capital only grant as part of the proposed new environmental land management scheme?

No comment.

Do you agree with the principle that five year agreements should be the norm under the new environmental land management scheme? What approach should we take to

¹² B-Lines are a solution to the problem of the loss of flower-rich habitat and pollinators. They link existing wildlife areas together, creating a high quality habitat network that weaves across the British landscape <http://www.buglife.org.uk/campaigns-and-our-work/habitat-projects/b-lines>.

targeting the new environmental land management scheme?

We think that the 5 year agreement is too short in relation to delivering the benefits of the agreements. Renewing every 5 years would also involve higher administration costs. We would therefore favour 7 years for mid-tier agreements. For more ambitious schemes, particularly the next generation of HLS, 10-year agreements should continue to be the norm, as more complex environmental objectives generally need longer to deliver.

Link believes that targeting should be focussed around the key elements of the Lawton Review's *Making Space for Nature*, to enhance the resilience and coherence of England's ecological network: more, bigger, better and joined to enhance biodiversity. The targeting should start with the management of key sites, and then expand out from these to increase the habitat resource which will connect the key sites and facilitate linkages.

However, we are slightly disappointed that more information about targeting has not been made available in the consultation, particularly in relation to landscape character. From the information that is available it seems likely that in terms of prioritising and targeting agreements that maintain landscape character, such 'area based' agreements will be predominantly in National Parks and AONBs. This means there is likely to be very limited funding for agreements in the wider countryside. Link believes it is essential that the targeting system for NELMS makes adequate provision for managing high quality landscapes, (for example undesignated parkland and other undesignated but important historic landscapes), in areas outside of National Parks and AONBs.

As previously noted, hard boundaries will be needed to concentrate effort on some of the highest priority areas for species and habitats, amongst other priorities. Target themes whereby areas of opportunity are identified for certain priorities without 'hard boundaries' will be needed if the 'joined' part of the Lawton Vision is to be achieved. Highly suitable areas should not be disregarded on the basis of geographical boundaries.

With the exception of the highest priority sites is there a case for making advice and guidance available increasingly on line or through third parties under the new environmental land management scheme?

Link acknowledges the Government's desire to move more information online. However, we strongly support face to face advice and as noted in the consultation, Defra's own evidence has highlighted the importance of this¹³. Feedback from farmers repeatedly reinforces the importance of good advisers, and the importance of continuity of advice. Good advisers do not just provide technical advice. They are key to getting farmers to 'own' the aims of their agreement and they make a huge positive difference to environmental outcomes. They can often be important 'gatekeepers', providing links between farmers and local communities. It is not surprising then that all the evidence suggests that farmers welcome high quality, consistent advice in this area, when they are offered it.

It is also important to note, that although Government wishes to move more of their information online, many farmers still do not have access to broadband and will not be able

¹³ P44, point 5.41, Consultation document.

to see the online advice. This makes it even more important to have targeting coupled with good quality advice from Natural England and historic environment advisers.

Where should we set the scheme entry requirements (ie above the legal baseline) for the proposed new environmental land management scheme?

No comment.

Have we identified the right areas of support under the new Rural Development Programme to help improve the competitiveness and efficiency of the farming, forestry and other land based sectors? Are there any other areas which could be supported? What activities to support the farming, forestry and other landbased sectors under the new Rural Development Programme would provide the best value for money for the UK taxpayer?

Generally we support the areas proposed. However, we suggest that the areas which would bring the greatest results both for the industry as well as value for money for the taxpayer would be:

- Advice and guidance on best practice to support environmental performance and deliver on regulation e.g. WFD, air quality and nitrogen deposition, pesticides within the Sustainable Use Directive.
- Supporting understanding and sustainable use of natural resources.
- Supporting co-operation and collaboration within the supply chain including equipment purchase/use.
- Supporting improved business management practice.

The list provided is very extensive and little information is given on the specifics of any schemes so it is difficult to assess how effective these proposals could be. Link would therefore suggest that the best results would be achieved by a targeted scheme rather than blanket access to options. We would welcome further discussions on how this could be progressed.

How should we support advice and skills for the farming, forestry and landbased sectors under the new Rural Development Programme? How can we ensure any advice provided to the farming, forestry and other land based sectors and through the new environmental land management scheme is integrated and linked with advice provided within the industry in the light of the Review of Advice and Partnership Approaches?

See Link's answer to the question - *With the exception of the highest priority sites, is there a case for making advice and guidance available increasingly on line or through third parties under the new environmental land management scheme?*

**Wildlife and Countryside Link
November 2013**

