

ENVIRONMENTAL LAND MANAGEMENT POLICY DISCUSSION DOCUMENT

The National Association for Areas of Outstanding Natural Beauty (NAAONB) is a charity that promotes the conservation and enhancement of natural beauty, and advances the education, understanding and appreciation of the public in relation to this, in and around Areas of Outstanding Natural Beauty (AONBs), other Protected Areas, and those landscapes for which designation might be pursued.

In addition, the NAAONB promotes the efficiency and effectiveness of those organisations promoting or representing AONBs, other Protected Areas and those landscapes for which designation might be pursued. Its membership comprises AONB partnerships, local authorities, private sector bodies, and individuals with an interest in promoting the aims of the NAAONB.

A number of AONB partnerships¹ may have responded individually to this consultation and the comments of the NAAONB should be seen as supportive and supplementary to these.

COMMENTS

We are delighted to have this opportunity to feed into the discussion on Environmental Land Management, to ensure that it helps to deliver the core purpose of AONB designation – to conserve and enhance the natural beauty of AONBs.

The Government's 25 Year Environment Plan states that AONBs and National Parks (National Landscapes) comprise some of our most unique, cherished and valuable natural assets. It also states that the Government will make sure that National Landscapes continue to be conserved and enhanced. Existing and previous agri-environment schemes have been invaluable but often limited in conserving and enhancing natural beauty. ELM provides an incredible opportunity to deliver a step change in delivering the core purpose of National Landscape designation, and to reverse the decline of the special qualities and landscape of National Landscapes. ELM will also enable National Landscapes to help deliver the Government's 25 Year Environment Plan and the 2050 Carbon Neutral targets.

National Landscapes have statutory Management Plans – the CROW Act (2000) introduced the requirement to produce statutory management plans for all AONBs and the Environment Act (1995) did the same for National Parks. These Plans, and their supporting information, guidance and advice, provide the ideal basis for delivering ELM in National Landscapes.

¹ AONB partnerships, with a lower case p, is the generic term used by The NAAONB to refer to AONB Partnerships, Conservation Boards and any other organisation recognized as the lead governance body for an AONB.

**The National Association for
Areas of Outstanding Natural Beauty**

Belmont House, Shrewsbury Business Park
Shrewsbury, Shropshire, SY2 6LG

office@landscapesforlife.org.uk

Twitter @NAAONB

A company limited by guarantee no: 4729800

Charity Number: 1158871

Registered office as above

National Landscape Management Plans identify national and local priorities through a process of engagement with stakeholders and the public, and they are reviewed and updated every five years.

To deliver the Management Plans teams work in established partnerships with their local landowners to effect positive landscape change – farmers, large estates, charities, local authorities and other conservation organisations such as Natural England, the National Trust and the RSPB. We believe that, with their existing relationships with local partners, National Landscape teams are ideally placed to co-ordinate the delivery of ELM.

The Landscapes Review, which reported to Defra in September 2019, made the Proposal that there is “A central place for national landscapes in new Environmental Land Management Schemes.”

It went on to add that “...it is obvious that ELMS..... will have a bigger effect on our national landscapes than anything else being planned by government. Individual Management Plans should be the guiding framework for setting landscape-scale priorities for future payments for public goods which support and enhance the value of nature and natural beauty in all its forms.” (p56 Landscapes Review – Final Report, September 2019).

With this in mind the NAAONB is very pleased to submit the following answers to the consultation questions. It is important to note that we are making this submission following a period of consultation with AONB partnerships in England.

QUESTIONS

1. Do you want your responses to be confidential? If yes, please give your reason.

No

2. What is your name?

National Association for Areas of Outstanding Natural Beauty (NAAONB)

3. What is your email address?

office@Landscapesforlife.org.uk

4. Where are you located? North East/North West/Yorkshire and The Humber/East Midlands/West Midlands/East of England/London/South East/South West/Remote

All. There are 34 AONBs in England, from the Solway Coast to the Isle of Wight and Cornwall to the Suffolk Coast. AONBs cover 15% of England.

5. Who are you? Internal to Defra/Defra arms-length body (ALB)/Lobby group/Other government department/Parliamentary group/Land manager/Other (please specify)

The NAAONB is a national charity representing all AONBs.

6. Do you have any comments on the design principles on page 14? Are they the right ones? Are there any missing?

The Design Principles seem about right. We particularly note on page 10 that scheme design is working to reflect the Glover Review for designated landscapes. We assume this is mainly included in principles ‘a’ and ‘b’ but reflected in all design principles.

Principles 'a' and 'b' are particularly important features of National Landscape Management Plans that are reviewed, refreshed and where necessary re-written on a statutory 5-year cycle. We therefore strongly support them.

We definitely support the principle of "...the delivery of outcomes at all spatial scales through collaboration..." and this is being investigated in the 'Farming for the Nation' Test and Trial. In the Blackdown Hills AONB one of the project objectives is "To explore how investing in the capacity of landowners to liaise and build trust amongst themselves, supported by holistic spatial data, can improve ELMS take-up in high nature value landscapes."

We particularly support principles (g) and (i) and both of these are considered in the 'Farming for the Nation' Test and Trial. In the Tamar Valley AONB the objective is "To test and trial a mix of new-to-market soil scanning technologies, to understand if they are able to produce replicable and consistent results to measure and assess the natural capital position of the soil and its capacity to deliver ecosystem service benefits through ELM."

And in the Surrey Hills they are looking "To deliver, through co-design, a landscape scale approach to identifying priorities, payments and contracts, supported by innovations in mapping and remote sensing."

It is important that local targeting takes a holistic 'landscape approach', building upon the investment in AONB Management Plans and National Character Areas.

Understanding baseline conditions is also important if some of the mistakes of the past are to be avoided. For example, woodland creation on blanket bog and species-rich grassland.

A new regulatory baseline will be required to fill the gap left by the transition away from direct payments and cross-compliance. The new baseline should apply irrespective of participation in ELM, ensure the protection of natural and cultural assets and close loopholes.

A smooth transition is vital to reassure farmers and land managers, who are making decisions about the short to middle term, that ELM will work for them and to keep them on-side. Failure to reassure could risk decision making that harms the environment permanently or could take a long time and be costly to reverse.

7. Do you think the ELM scheme as currently proposed will deliver each of the objectives on page 8?

Yes, ELM as currently proposed should deliver on the two strategic objectives, particularly if Tier 1 is open to all land managers who deliver the outcomes. Objective 1 'will prioritise between environmental outcomes where necessary'. We are particularly interested to see how National Landscapes are prioritised where this happens. Presumably National Landscapes will be a high priority as they are nationally protected landscapes and their conservation and enhancement ensured in the 25 Year Environment Plan.

Although there appear to be positive links between the Agriculture Bill, Environment Bill and the Office for Environmental Protection, clarity is needed on how Defra is joining these up to ensure that whilst protecting and enhancing natural resources we are ensuring that we are more resilient for the future in terms of food production. A longer term transition process is needed, with Government support, to be more self-sufficient and to work towards a reduced need for agri-environment schemes so that nature/management of natural resources – primarily soils (on which everything depends) – is an intrinsic part of food production. For example, there is currently a lack of investment in soils and monitoring of condition – farmers could easily do this with support and training.

8. What is the best way to encourage participation in ELM? What are the key barriers to participation, and how do we tackle them?

The ELM policy discussion document identifies many key barriers and the best approaches to encourage participation.

Of vital importance to scheme uptake will be the role and approach of the body responsible for monitoring and payments. The RPA is unpopular with farmers, having developed a reputation for unreasonable enforcement, fines and late payments. If carried over to ELM it will lead to low scheme uptake, at least initially, until farmers feel forced to join the scheme to try and replace income lost in the phasing out of the Basic Payment. A fresh start will be needed with an enabling attitude, working with agreement holders more as partners and giving them the chance to rectify any issues.

Consistency and avoiding conflicting objectives for any given area is another key point. Some farmers have commented that different organisations give different advice which causes confusion. Common objectives for an area will be a key to ELM participation.

Initial findings from the NAAONB 'Farming for the Nation' Test and Trial have identified that current terminology being used in discussions about ELM may be a barrier to many farmers and land managers, particularly those who have not been involved in higher level schemes before. Concepts such as public goods, natural capital and ecosystem services need to be explained and discussed before moving on to other aspects of ELM design and delivery. When explained, these are usually concepts that farmers relate to strongly. Interestingly, the concept of payment by results is one that most farmers and land managers need little introduction to. The Payment by Results pilot in the Yorkshire Dales has added an element of competitiveness, resulting in pride at achieving 'top score'. Self-assessment has also engaged the farmers in what looks good.

The Test and Trial has also identified that some farmers and land managers, particularly those of a younger age, are keen to see better use of technology in the efficient delivery of ELM, including online applications, remote sensing and use of precision farming technologies for monitoring outputs and outcomes. Other farmers, including those who are less familiar with technology, would prefer simpler paper-based systems.

The current scheme threshold does not allow for small areas of high value habitat/interventions to be included, or for the possibility of a network of such sites to be put forward as a collective. A model that could enable this would be valuable in fragmented and complex landscapes that have many sizes, scales and types of farming practice – from commercial through to lifestyle. For example, the Forest of Bowland AONB has carried out intensive work to develop 'pollinator patches' as critical stepping stones within pollinator corridors. These small-scale intensive areas, which might include offsite propagation of endangered species such as globeflower, are not easily accommodated within the existing Countryside Stewardship scheme.

The discussion document identifies the need to avoid a top-down approach and that local participation in identifying and agreeing local priorities is important. AONB Management Plans already seek to do this, and identify agreed priorities and objectives for the AONB through a process of local participation and consultation. The process is not perfect and improvements can be made, but it's an approach worth looking at.

Outside of National Landscapes, the National Character Areas (NCAs) provide a good and already established system on which to base ELM objectives. The discussion document already identifies the NCAs and the opportunity for more local participation in reviewing and determining the Statements of Opportunities.

Landscapes – AONBs, National Parks and NCAs – are a particularly good approach on which to base ELM objectives. Landscape 'units' such as these have distinct characteristics of geography, geology,

ecology, land use, farming and farming challenges. We find farmers identify themselves with these landscapes more than with local government administrative boundaries of Counties or Districts.

9. For each tier we have given a broad indication of what types of activities could be paid for. Are we focussing on the right types of activity in each Tier?

Yes, the examples of activities for each tier are right and provide a good structure for ELM to deliver its objectives. The tiers also provide the structure to deliver local priorities and create opportunities for larger landscape scale delivery. Tier 1 needs to be ambitious otherwise it will just be supporting 'business as usual' and be viewed as a successor to the Basic Payment Scheme.

We recommend the inclusion of some capital items within Tier 1. Whilst Tier 1 is designed to incentivise environmentally sustainable farming and forestry practice, the inclusion of some capital items would be advantageous. Hedge restoration, for example, is always popular and is one of the best ways to engage farmers and start re-building habitat connectivity (e.g. under current rules, a new hedge automatically gets a 2m wide grass buffer strip on each side after 5 years).

As with Mid-Tier currently, if the Tier 2 'threshold' is set too high there is a risk that this would push people down into Tier 1 and therefore shut the door on receiving funding for capital items. This in turn would then potentially require an 'add-on' scheme such as the current Hedgerows and Boundaries Grant to plug the gap again.

Including some capital items in Tier 1 would also enable land managers to undertake valuable practical work should Tier 2 not be available due to any spatial prioritisation that may be required due to, for example, budgetary limitations.

One area of concern is addressing invasive non-native species and issues such as the management of deer and other pests. These require a landscape-scale approach that may not sit easily within the tiered approach. These activities need investment in training and co-ordination as much as in the activities on the ground – it is unclear how these would fit within ELM.

For Tier 3 we suggest that projects should probably demonstrate a greater level of integration and it might be useful to draw on existing activity, for example Pennine Peatlife:

https://www.northpennines.org.uk/what_we_do/peatland-programme/pennine-peatlife/

The current system by which capital works are paid through the Countryside Stewardship Scheme is very limiting as it relies on the agreement holder being able to bank-roll large restoration projects. In relation to peatland restoration work, where projects can range up to £450,000, agreement holders rely on the larger estates to bank-roll the works and then pay them back once the funds have cleared. However, this isn't an option for everyone. This financial requirement has led to some schemes excluding capital restoration work due to agreement holders not being able to pay up-front. This can be resolved by having accountable bodies (e.g. Durham County Council/North Pennines AONB Partnership) identified as a trusted 'agent' without a cash flow issue, and with a simple agreement with RPA/NE/EA the landowner can make more work happen on the ground. Capital projects on very damaged sites need to be completed over many years, not rushed to meet a financial deadline, and some sites may need 2-3 years' rest before the second treatment.

There needs to be a new focus on the reintroduction of sphagnum on blanket bog via ELM. The Pennine PeatLife team have undertaken some pilot projects in the North Pennines AONB and sphagnum reintroduction should become normalised as part of ELM. This approach can also be applied to other specialised blanket bog species such as crowberry, etc. The NAAONB can provide an illustration of the costs involved if required.

ELM should include a Bog health assessment via UAV and site visits in order to assess the amount of sphagnum. This is currently not part of Countryside Stewardship options PA1/PA2 and would support the reintroduction of sphagnum as above.

There is a need for clarity, harmonisation and a push for blended finance in ELM that would allow carbon credits (i.e. the UK Peatland Code) to be sold to private investors. This would allow other

sources of finance to be accessed and would ensure that all parties have certainty as to the sources of funding and their roles.

Previous schemes failed to help reverse biodiversity declines because nature conservation objectives were 'shoe-horned' into agricultural practice. Whilst this helped the relatively common and widespread species, it did little for specialist species requiring specialist habitat management. ELM could and should tackle this by supporting species conservation within broader habitat types. This approach has worked well for 'Back from the Brink' (former) Heritage Lottery Fund projects in Dorset, the Cotswolds and elsewhere, where landowners are given the advice and resources needed to undertake particular management for specialists such as solitary bees and wasps in heathland and grassland situations. The Natural England 'Creating Spaces for Nature' initiative has also looked at this issue. To support this, it is vital that land managers such as NGOs have access to ELM to conserve designated sites with their often exacting conservation objectives. If we are going to make a difference and reverse biodiversity decline the tools will be needed to achieve this rather than using other tools that were not designed for the job.

10. Delivering environmental outcomes across multiple landholdings will in some cases be critical. For example, for establishing wildlife corridors or improving water quality in a catchment. What support do land managers need to work together within ELM, especially in Tiers 2 and 3?

We consider this relates strongly to Tier 1 as well, not just especially to Tiers 2 and 3. Land managers will need clear, agreed, objectives, as well as advice and the direct support of a co-ordinator. The facilitators supported by the Facilitation Fund have proven the benefit of this approach but it is too limited at times. A co-ordinator, more akin to a project officer, who can encourage and support participation and provide advice and guidance will be invaluable in achieving the objectives. For example, the Forest of Bowland AONB has provided the secretariat for the Pendle Hill Farmer Facilitation Fund, working with over 30 farmers to deliver training on biodiversity and sustainable farming. We would, therefore, like to see the investment in Facilitation Groups built into ELM.

11. While contributing to national environmental targets (such as climate change mitigation) is important, ELM should also help to deliver local environmental priorities, such as in relation to flooding or public access. How should local priorities be determined?

Local priorities are already identified within AONB and National Park Management Plans and NCA 'Statements of Opportunities'. The difference between NCAs and protected landscapes is that the local priorities are reviewed and agreed every five years in National Landscape Management Plans through a process of participation, consultation and local community involvement. National Landscape Management Plans have a broader approach than NCAs but these broader areas are very relevant to ELM, including in terms of access, cultural heritage and local distinctiveness. The Management Plans, being a plan for the National Landscape as a whole, also cover planning, transport and themes such as tranquillity and dark skies, etc. The Management Plans also include the delivery of national priorities alongside local priorities and they are frequently the same.

Two of the top strategic objectives for the 'Farming for the Nation' Test and Trial are:

1. AONB MANAGEMENT PLANS AS STRATEGIC SPATIAL FRAMEWORKS. To trial, with stakeholders, the role of AONB Management Plans as strategic spatial frameworks for informing and targeting the delivery of public goods through ELM.
2. INTEGRATED LAND MANAGEMENT PLANS. To co-design, with land managers, integrated ELM Land Management Plans that work at the landholding and farm cluster scale, derived from AONB Management Plans.

Outside of National Landscapes, the NCAs provide a good and already established system on which to base ELM objectives. The discussion document already identifies the NCAs and the opportunity for more local participation in determining the Statements of Opportunities.

The other advantage of using landscape as the basis for ELM is that it avoids breaking-up landscapes along 'artificial' boundaries. For example, the Cotswolds AONB lies across 7 County/Unitary areas and three Regions. If ELM were to be based on traditional administrative boundaries, the Cotswolds could have up to 7 different sets of ELM objectives. Likewise, the Chilterns AONB lies across 5 County/Unitary and 2 Regions, the North Pennines AONB across 3 County/Unitary areas and two Regions and the North Wessex Downs AONB across 7 County/Unitary areas and two Regions. The same would apply to NCAs such as the Severn and Avon Vales and the Shropshire, Cheshire and Staffordshire Plain.

12. What is the best method for calculating payments rates for each tier, taking into account the need to balance delivering value for money, providing a fair payment to land managers, and maximising environmental benefit?

AONBs are involved in a range of Tests and Trials across the country as well as delivering a suite of tests and trials under the umbrella of 'Farming for the Nation'.

Some of these Tests and Trials are looking at payment rates. Feedback from farmers to date makes it clear that basing rates on income forgone is not popular. One clear recommendation from the Cotswolds AONB Test and Trial is that rates for specific outputs such as planting a hedge or restoring a drystone wall should be 115% of the cost to allow for some ongoing maintenance and an incentive for the land manager. Others recommended using the rates in the John Nix Farm Management Pocketbook. Farmers and land managers were asked to indicate on a table of actions and costs, which payment rate they thought reasonable. The rates with the majority of responses included:

- £25 per m for hedge planting
- £250 per m for rebuilding a drystone wall
- £500 per ha for herb-rich pasture creation
- £250 per ha for managing woodland

An important factor to take into account is the variation in cost across the country. Examples include the cost of stone for drystone walling, labour and different styles of hedge laying that require different levels of materials. One approach to regional variation in cost is covered in the John Nix Farm Management Pocketbook.

13. To what extent might there be opportunities to blend public with private finance for each of the 3 tiers?

There is considerable potential across all three Tiers for blending or stacking finance. Approaching this by theme and not Tier may be a better approach. An obvious example is water quality, which all Tiers can deliver on and which is of direct interest to water companies (most of which are already involved in upstream works with farmers and land managers).

In South Devon the 'Growing Orchard Communities' project excelled in supporting local people to manage healthy orchards for the whole community to enjoy. It was run by South Devon AONB in partnership with Orchard Link, a local volunteer-run, not-for-profit organisation. The funding mix of the £86,800 project included the (former) Heritage Lottery Fund, public and private sector grants, local authority locality budgets and S106 funds linked to development consents.

Other examples could include:

- Wildflower-rich grassland restoration/creation – water companies, corporate carbon offsetting, developers (offsetting)
- Soil management – food retail, food processing such as breweries, water companies
- Woodland creation – corporate carbon offsetting, public donations

- Natural flood management – businesses, communities, local authorities, insurance companies
- Moorland restoration – corporate carbon offsetting, water companies

There is however a risk that blended funding might start to skew ELM with private finance or planning-led Biodiversity Net Gain. This could lead, for example, to promoting woodland creation over restoration of species-rich grassland, which is more complicated and requires a long term commitment.

There is a concern that reverse auctions can be a blunt tool to achieve multiple objectives. Indeed, there is a risk that they may even reward past poor practice and disadvantage landowners and farmers who have tried to do the right thing.

14. As we talk to land managers, and look back on what has worked from previous schemes, it is clear that access to an adviser is highly important to successful environmental schemes. Is advice always needed? When is advice most likely to be needed by a scheme participant?

The need for individual advice will be variable depending on the ability, experience and knowledge of the participant. The vast majority of participants, however, will need at least some advice. The most likely areas of advice need include: explaining ELM and providing assistance in deciding whether to apply; support with the application form; guidance on the objectives the farm/landholding can deliver; advice and guidance on specific actions/outputs such as farmland birds, grassland creation, woodland management etc; ongoing support during agreement delivery, including monitoring and review. Within protected landscapes advice will need to include guidance on delivering National Landscape objectives, Management Plan policies and conserving and enhancing the Special Qualities of the National Landscape. A good example of how advice, guidance and support can engage farmers and deliver actions and outcomes very successfully is the Cotswolds Farmland Bird Project. Even though the project has now finished, its legacy still continues.

The same will apply to groups working collaboratively, with advice/encouragement to work across their holdings.

There is a huge amount of useful material published by a wide range of organisations and institutions but there is currently no easily assimilated summary of best practice. Simple guidance with clear messages about the most effective forms of intervention will be needed to ensure good ELM outcomes.

Through the ‘Farming for the Nation’ Test and Trial we are finding that poor advice and advisors can have devastating effects on the potential uptake of schemes. In some of the participating AONBs they are finding historically low levels of uptake of agri-environment schemes. When in discussion with landowners and managers the reason has been a poor advisor who failed to work effectively with the farming sector.

Training for advisors is also critical. It is important that they have the breadth as well as the depth of knowledge, in order to recognise potentially competing land management objectives.

15. We do not want the monitoring of ELM agreements to feel burdensome to land managers, but we will need some information that shows what’s being done in fulfilling the ELM agreement. This would build on any remote sensing, satellite imagery and site visits we deploy. How might self-assessment work? What methods or tools, for example photographs, might be used to enable an agreement holder to be able to demonstrate that they’re doing what they signed up to do?

Self-assessment will ultimately rely on relationship building and trust. Photographic evidence is straightforward for actions such as restoring a drystone wall, planting a hedge or creating a pond. More complex monitoring, for example for creating or managing wildflower-rich grassland, will require training and/or a simpler proxy measure as in the Payments by Results trials. Fixed point photography and video could also be used. In some areas volunteers could help such as the RSPB’s Volunteer and Farmer Alliance, the Stroud Wildlife Survey Group and the Gloucestershire Naturalists’ Society.

16. Do you agree with the proposed approach to the National Pilot? What are the key elements of ELM that you think we should test during the Pilot?

The National Pilot will be particularly important to trial the processes of application, objective setting, payment rates and when payments are triggered. It is essential that the Pilot includes farmers and land managers in National Landscapes, to test how ELM will fit with and deliver the primary purpose of National Landscapes, National Landscape Management Plans and conserving and enhancing the Special Qualities of the National Landscapes.

17. Do you have any other comments on the proposals set out in this document?

No.