

ENVIRONMENTAL POLICY FORUM

c/o Society for the Environment

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Response to the Environmental Land Management Policy **Discussion Consultation**

Introductory comments

The UK's departure from the Common Agricultural Policy represents a major opportunity to improve our landscapes and people's relationship with them. There is much in the ELM document that is very positive.

We support the essential design principles underpinning this work, most especially that public money should be spent on delivering public goods. However, it is essential that the level of ambition on funding and coverage remains high. This means:

1. The UK's exit from the EU should not lead to a reduction in the overall financial envelope for the achievement of positive environmental outcomes, especially for the period of the 25-year Environment Plan.
2. The new scheme(s) must have the ambition to improve a much greater extent of land than currently, and therefore to target investment where it will deliver the greatest benefits. This will mean ensuring that the scheme is open and appealing to anyone who owns or manages land, as well as increasing uptake amongst smaller sites, particularly in areas fringing towns and cities.
3. That any transition period begins with a fixed end date, after which point no public funds will support farming practices that lead to a decline in the quality of the natural environment.

We support the ongoing transition period to move from the existing system to the new. The UK must use this period to test, design and deliver the best system for improving our agricultural landscapes. Whilst there must be ongoing refinement after this period, the underlying principles should be put on a long-term statutory footing, to ensure there is no erosion of the standards on public money for public goods.

The Environmental Land Management system can be the main delivery framework for transforming all land through investment and sustainable resource management. The initial focus of the system is to replace subsidy for farming as we leave the EU; however, we must not lose the wider ambition set out in the 25 Year Environment Plan.

Defra now has an opportunity with ELM to develop a world-leading scheme that is far more ambitious than previous agri-environment schemes, and to transform the way we manage land. Getting ELM right is vital to achieve conservation goals but also to restore the natural processes upon which the production of healthy food, timber, and other goods relies.

The new Environmental Land Management system should focus on delivering a resilient and functional natural environment, that works in harmony with sustainable food production.

Who we are

The Environmental Policy Forum (EPF) is a network of UK environmental professional bodies promoting environmental sustainability and resilience for the public benefit. The EPF's member bodies have a collective membership of around 70,000 environmental professionals, many of whom are individually chartered in environmental practice, science and engineering disciplines.

www.envpolicyforum.org.uk

Responses to questions (as below)

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

Comment

Overall, the design principles are sound and capture most of what would support both land managers and the environment. We have specific comments on principles b), d,) and f).

Principle b) This is vital, but the wording would benefit from greater specificity. This is also a good place to include the need for clarity as a design principle. Whilst land managers understand the principles of public money for public goods, it can be less clear which national policies and outcomes are relevant to their individual holding(s).

The public goods agenda needs to be set out spatially to enable the industry to align their business objectives with these outcomes. Guidance set out at a landscape scale would radically improve communications and understanding, using existing frameworks, such as the National Character Areas, for individual Environmental Land Management Plans. Existing landscape-scale actors, such as National Parks, AONB Conservation Boards, local ecological networks, catchment partnerships, etc. have to play a role. This should be made very clear.

Principle d) Achievability is essential – however this should not be barrier to ambition. Particularly in light of the fact that the new scheme should seek to widen its land

coverage and be more inclusive of a broader range of actors, including those who will not have delivered similar schemes before.

This principle should therefore also look to address the existing skills gap which affect achievability, encouraging the growth of the sector. A proactive approach must be taken to **addressing skills gaps**, which are not limited to those in the farming community, and not limited to those needed to run a farm business. The level of ambition described in the command paper will not be met without investment in skills related to land management.

Principle f) Whilst we broadly agree with principle F there is an important balance to be struck. There is broad support for schemes and agreements to be simple and easy to use but we have seen that overly simple schemes have failed to deliver the right outcomes. Entry Level Stewardship, whilst taken up in large numbers, ultimately failed to deliver the environmental outcomes desired. Having skilled land managers and advisers help deliver these schemes is therefore vital in increasing take-up and deployment. There may not be a one-size-fits-all administrative approach.

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

Comment

The second objective could be broadened, to cover both the longer-term and beyond just agriculture. A commitment to helping transition wider land management practices towards sustainability would be preferable.

Both objectives are inherently linked; tackling the second with a whole farm approach will address short term environmental issues whilst ensuring long term environmental performance.

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

Comment

- Provide attractive financial incentives for land managers

As 57% of farming profits originate from public investment the most obvious and efficient way of securing participation in ELM is to ensure that the level of funding is sufficient to reward land managers for environmental goods which are not properly valued by the market (which would be a “market failure” and hence need addressing, and would be right and proper to address), and at a level sufficient to make that work and investment worthwhile. At a minimum this would include assuring that the current level of national investment - £3.5 Billion – is maintained.

- Highlight the success and importance of public goods

More can be done to promote the benefits that public goods provide to all communities. “Public money for public goods” is a useful concept for doing so at a wider public level. Working to highlight the benefits of the scheme to land managers will also be important as previous reputational damage needs to be repaired.

- Ensure the scheme application process is streamlined

The long manual and difficult application process made the Countryside Stewardship (CS) unattractive for many. Land managers need clarity about how the scheme will fit in with business planning. Rolling applications should also be encouraged as a single deadline has made it difficult for many in this diverse sector to manage. The current arrangement for forestry provides sign-off both for financial support and for the regulatory permissions required by the Forestry Act in one process. If this principle is not retained it would be a significant barrier to participation, expecting woodland owners to deal with multiple government agencies. There needs to be a single point of accountability for grant approvals and regulatory sign-off.

- Provide dedicated training

Ultimately, the greatest determinant of success in delivering environmental outcomes is the skill, knowledge, and approach of the person(s) delivering it. Defra should work with the existing professional bodies represented in the Environmental Policy Forum to ensure that the various professionals involved in delivery are highly skilled and capable and have access to the tools and training to do their job well. Professional bodies are already set up to accredit professional competence, deliver Continuing Professional Development (CPD), provide a home for best practice guidance, etc. ELM should make better use of this.

- Provide access to dedicated advisors

Access to appropriate advice is critical, both beforehand and in ongoing monitoring and management. Competent, professional advice and project management is vital in transitioning to the new system - and to meet other best practice standards and environmental targets. This should support ongoing adaptive management, which is key in light of climate change.

- Advice must be accessible to all, appropriately funded, accredited, and supported by government (e.g. with clear guidance). The professional bodies must be involved. Management of woodland must be added.

With tree planting becoming a major priority for the government, ELM can be a key delivery mechanism for rural trees. Current uptake of forestry and management by land managers has been poor due to the lack of financial incentive. Management of these areas was proving more costly than current provisions under CS. Furthermore, progress was hampered by short term payments of only 10 years, where forestry has longer term goals. Woodland creation must not be a single payment but linked to ongoing stewardship commitments – including capital investment, as well as multi-annual.

There is a huge amount of unmanaged woodland that could deliver public goods, with relatively simple interventions, were tier 1 opened up to a broader range of land owners/managers. ELM can help deliver the ambitions of the England Tree Strategy here.

These measures must also be expanded to a wider sector to include all land managers who are involved with forestry. Recent communication on the development of ELM has focussed very heavily on farmers, which could impede uptake amongst a wider cohort.

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?

Comment

The EPF feels that the activities indicated are broadly acceptable, what is lacking however is detail about what individual activities will be under each tier. Understandably this is still at an early stage and these guiding principles are useful but further examination of what types of activities could be delivered by land managers is needed.

Resources are not unlimited and therefore need to be directed to where they can create the most environmental benefit.

Tier 1. Must include nature recovery and the net zero target for all land (moved from Tier 3). These are part of the sustainable farming objective. Tier 1 should have a foundation option that transforms the health of all soils in a way that acts as a catalyst for nature recovery. This option should adopt the warnings of the Government's Chief Scientist that the country has failed to appreciate the unintended consequences of any of the pesticides – the precautionary principles must, in this case, prevail.

Tier 1 must include a broad forestry, agroforestry, and management in its scope. Putting this area in Tier 1 will make it more accessible particularly for land managers with small holdings, where relatively simple interventions (such as stock exclusion, edge and ride management, etc.) can make a big difference. This can start a drive towards the governments ambitious tree targets.

Tier 2. There has to be a way of articulating spatially a joined-up agenda that integrates national and local policy outcomes. There is a potential conflict in the wording – 'local' in the heading and 'strategic' in the bullet points. It would be helpful for the reader if examples of the type of outcome for each tier was included – for example under tier 2 could this include local food for local consumption, modernised access for health and wellbeing and better mental health, reconnecting the public with food growing, enhancing education and meeting the experiential needs of developing children, air quality improvements and microclimatic manipulation for specific settlements.

Tier 3. Could this include building resilience to climatic events for specific towns and cities, restoring landscape scale ecosystems, for carbon sequestration, restoring strong landscape character for tourism or conserving historic landscapes.

10. Delivering environmental outcomes across multiple land holdings 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?

Comment

Arriving at a clear spatially articulated Environmental Land Management Plan at a landscape scale that land managers can then work towards. The condition of the awarded contracts would encourage the necessary collaboration. Collaboration is costly – ELM must pay for it.

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?

Comment

It is important for land managers to be able to determine site-specific priorities. However, such outcomes must be founded on consistent and detailed data which provide the most public goods for public money. Enabling a consultative process with land managers at a landscape scale will be important to allow collaborative work on delivering localised benefits. For example, multiple land managers in an AONB may want to prioritise enabling public access, this would be more effective with collaboration across multiple premises.

Local stakeholders should also be consulted on local public goods that they want, within the context of a national strategy. This could be through existing statutory and non-statutory platforms (e.g. National Parks, Local Nature Reserves, Conservation Boards, Local Nature Partnerships). May also be opportunities for input at Parish Council level. Opportunity mapping should be considered, within the context of Local Plans and economic strategies.

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

Comment

Blending public and private finance offers a range of opportunities, especially if these benefits are combined and stacked. For example, if private finance is invested in carbon storage of woodlands then the public CS payments may be attributed to the biodiversity gain.

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?

Comment

The importance of access to environmental advice, from competent professionals, cannot be overstated. Given that intensive advice to every scheme will not be possible, there is a need to improve the quality of advice that is given to land managers.

Government should consider how accreditation and training requirements for advisors can be provided to raise the standard and consistency of advice and should discuss these issues with Further and Higher education. This could include the identification of appropriate third-party standards and the accreditation of private sector advisers by professional bodies.

Government should note and make use of the fact that professional bodies are already set up to accredit professional competence, deliver Continuing Professional Development (CPD), provide a home for best practice guidance, etc. ELM should make better use of this and discussion with appropriate professional bodies on “accreditation” is recommended. EPF and signatories stand ready to help.

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 visit 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?

Comment

Although we support self-assessment to a limited extent, environmental benefits need to be assessed by environmental professionals. Training could be provided in the use of methods such as survey forms, photographs, species recording, and ability to identify indicators of success. However, by themselves, these methods will not be sufficient to know whether public goods are truly being delivered using public money. Professional accreditation will be needed at some stage in the process.

Self-assessment will work better within collaborative groupings and hence a further advantage to encouraging this way of working.

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?

Comment

A National Pilot ought to be spatially identified, covering the largest mix of habitat and soil types, catchment issues, urban needs, intensive and extensive farming systems. This would enable various options under each tier to be trialled. Currently, for instance, the timeline for the pilot only refers to Tier 1 which includes no forestry actions.

Key elements that could be measured include biodiversity gain, suitability of tiers, ability to adapt, and use of advice.



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Notes

1. The Landscape Institute (LI) is the chartered body for the landscape profession. It is an educational charity working to promote the art and science of landscape practice. The LI's aim, through the work of its members, is to protect, conserve and enhance the natural and built environment for the public benefit. The Landscape Institute provides a professional home for all landscape practitioners including landscape scientists, landscape planners, landscape architects, landscape managers and urban designers.

www.landscapeinstitute.org

2. The Institute of Chartered Foresters (ICF) is the Royal Chartered body for Foresters and arboriculturists in the UK. ICF regulates standards of entry to the profession, doing so by the provision of services and support to its members; guidance to professionals in other sectors; information to the general public; and educational advice and training to students and tree professionals seeking to develop their careers in the forestry and arboriculture industry. ICF works to foster a greater public awareness and understanding of the tree professions in order to serve a variety of commercial, recreational, environmental and scientific interests.

www.charteredforesters.org/

3. The Institution of Environmental Sciences (IES) is a membership organisation that represents professionals from fields as diverse as air quality, land contamination and education - wherever you find environmental work underpinned by science. A visionary organisation leading debate, dissemination and promotion of environmental science and sustainability, the IES promotes an evidence-based approach to decision and policy making.

www.the-ies.org

4. The Chartered Institute of Ecology and Environmental Management (CIEEM) is the leading professional membership body representing and supporting 5,000 ecologists and environmental managers in the UK, Ireland and abroad. Our Vision is of a society which values the natural environment and recognises the contribution of professional ecologists and environmental managers to its conservation.

www.cieem.net

5. The Society for the Environment (SocEnv) is comprised of 24 Licenced Bodies, with over 500,000 members between them. It received a Royal Charter in 2004, which empowers it to regulate the Chartered Environmentalist (CEnv) and Registered Environmental Technician (REnvTech) professional registrations globally. There are now over 7,000 environmental professionals currently registered who share a common vision of delivering sustainability through environmental professionalism.

www.socenv.org.uk