

Environmental Land Management Policy Discussion

Response from the Landscape Institute

31 July 2020

About us

The Landscape Institute (LI) is the royal chartered body for the landscape profession. As a professional organisation and educational charity, we work to protect, conserve and enhance the built and natural environment for the public benefit. The LI represents around 5500 landscape managers and landscape architects, including related professions including urban designers, parks managers, scientists and planners, working across urban and rural areas.

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 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. The Environmental Land Management system can be the main delivery framework for transforming all land through

investment and sustainable resource management. This must be built upon the strong foundation of legal protections contained in the Environment Bill.

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.

Response to specific questions

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

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) 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 what national policies and outcomes are relevant to their individual holding.

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.

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 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?

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?

- 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, 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 Schemes 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.

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?

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 one 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 one 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 were included – for example under tier 2 could this include local food for local consumption, modernised access for health and wellbeing, 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?

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 schemes must pay for it.

Farm Clusters should continue to be encouraged, particularly in the context of designated landscapes.

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?

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 about where the greatest public benefit can be achieved. 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 sites.

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). There may also be opportunities for input at Parish Council level. Opportunity mapping should be considered, within the context of Local Plans and economic strategies.

The development of farm clusters enables locally-relevant issues and projects, such as flood control and public access, to be managed and co-ordinated at a landscape scale – which is the appropriate scale to do so.

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

Blending public investment with existing sources of private finance can offer many opportunities, especially if it leads to cost savings, or else are stacked to promote multi-functionality where none would exist.

For example, if private money is invested in the flood mitigation potential of woodlands (e.g. by water companies) then the public ELM payments could be linked to ensure a wider range of outcomes.

There is also the potential to create new markets for private investment in environmental goods – however this will require wider acceptance and take-up of natural capital accounting techniques. The smaller scale of public administration in rural areas is also a barrier. In urban areas, combined authorities (for instance) are of a scale which has made the development of products like Social Impact Bonds more viable.

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 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. This could include the identification of appropriate third-party standards and the accreditation of private sector advisers by professional bodies.

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.

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?

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?

Yes. A National Pilot ought to be spatially diverse, 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.