



The European Agricultural Fund
for Rural Development:
Europe investing in rural areas



Countryside Stewardship:

Record keeping and inspection requirements

Applies to all multi-year and water quality agreements starting
on 1st January 2016

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1. Purpose

The new Rural Development Programme places a requirement on agreement holders to demonstrate that:

- they are eligible for the scheme,
- the activities funded under their agreements are appropriate; and
- the funded activity is taking or has taken place.

This is necessary to meet new EU requirements for evidence that public money is being spent effectively and is delivering the intended results.

Record keeping is a key component of an effective farm, or woodland, management system. Some existing farm records can be used to meet scheme requirements, but the scheme may also require additional records to be kept which relate specifically to the management being funded.

How to use this document

This document should be read in conjunction with:

- the [Countryside Stewardship manual](#) especially chapter 8 on scheme requirements and procedures;
- the Countryside Stewardship [terms and conditions](#); and
- the [Countryside Stewardship grants tool](#) that provides descriptions of the individual options and capital items that make up an agreement, including their evidence requirements.

Successful applicants will receive an agreement document that will confirm the types of evidence and records which must be maintained during the life of the agreement.

2. When is evidence required?

Record keeping and other forms of evidence will be needed:

1. When applying for the scheme

Evidence must be provided to demonstrate eligibility of the applicant, business, land, management options or capital items. This must be submitted with the application form by the application deadline, or the application will not proceed. The offer letter will make clear what evidence is necessary.

2. During the agreement period

Evidence is needed to demonstrate that paid actions have been undertaken. This may be required:

- to support a claim, in particular capital item claims. More information is set out below in [Section 3](#), and where relevant will be supplied with the claim form covering letter; or
- during or after an administrative check, an inspection, or other checks as described in [Section 4](#).

3. Beyond the agreement period

Some records and other forms of evidence must be retained for 7 years from the date the agreement expires or is terminated, as set out in the Countryside Stewardship terms and conditions.

Changes to evidence requirements for applications made in 2015

In 2015, evidence should be provided with the application where possible. However, in this first year of the scheme, time constraints on the application process mean that where this is not possible, applications will be assessed on the assumption that the required evidence will be provided later and, if successful, an agreement offer will be made on that basis.

The final date for receipt of the required evidence by Natural England is 15 December 2015.

Successful applicants must make sure that the evidence is received by Natural England by the closing date of 15 December or their agreement offer will be withdrawn. No adjustments can be made to an application. It is advisable therefore for applicants to submit their evidence as soon as possible.

The following evidence must be submitted earlier than the general deadline:

- the completed Historic Environment Farm Environment Record (HEFER) response must be submitted by 31 October for both Mid Tier and Higher Tier; and
- for Mid Tier applications the Farm Environment Record map and the options map and woodland management plans still need to be submitted with the application by 30 September. For Higher Tier the deadline remains the 31 October.

Simplification of some published record keeping requirements

The record keeping requirements for options and capital items published since April 2015 in the [CS grants tool](#) and as [PDF documents](#) on GOV.UK are in the process of being simplified. Until these have been updated please note that:

- Requirement to 'geotag' photographs removed.

The use of 'geotags' on photographs is no longer required (although the requirement to take an 'ordinary' photograph for particular options will remain – this will be made clear in the individual option prescriptions).

- Photographic evidence for annual claims from May 2016.

Photographs of multi-year management options are generally not required. A sample of agreement holders will be asked to take photographs as part of an annual sample. Those required to take photographs will be given notice of when photographs should be taken, which management options require a photographic record and the final date for return of the records.

- Invoices for capital items.

When claiming for capital items based on actual costs, agreement holders must submit original receipted invoices (that show payment for materials and contracted work) with the claim (see [Section 3.11](#) for further details). Invoices do not need to be submitted when claiming for all other options and capital items based on standard costs. Receipted invoices must be retained and made available on request.

- Written justification for capital items.

A specific written justification will not be required for capital items but agreement holders will still be required to provide other evidence requested such as: a photographic record before undertaking the capital works, a Farm Environmental Record (FER), Catchment Sensitive Farming Officer (CSFO) endorsement letter, or item specification.

3. General evidence requirements for applicants and agreement holders

3.1 Consents and permissions

It is the applicant's responsibility to obtain all consents or permissions that may be required in order to undertake the particular management **option or capital item**. The applicant is also responsible for obtaining any other permissions required due to the applicant's specific circumstances or location, eg planning permissions. The **Countryside Stewardship manual** includes further guidance on getting consents and permissions.

Where a consent or permission is required or the applicant has been notified by Natural England of the need for a consent or permission, copies of all consents, permissions and other evidence must be received by Natural England before an agreement offer can be made. The original documents must be retained by the agreement holder and made available by them on request or during inspections.

Catchment Sensitive Farming Officer endorsement

A small number of options and capital items set out in the table in **Section 5.3** of the CS manual that deal with water pollution are only available if endorsed by a CSFO. Applicants should contact their local CSFO for further advice. The endorsement must always be signed and dated and submitted with the application form by the application deadline.

In 2015, consents, permissions and other evidence should be provided with the application where possible. However, in this initial year of the scheme time constraints on the application process mean that where this is not possible, all consents, permissions and other evidence must be received at the latest by Natural England on or by 15 December 2015. Failure to provide Natural England with all the required evidence on or by that date will result in the offer lapsing.

3.2 Organic certification

Agreement holders must comply with the organic standards on all their organic land for the entire duration of the organic option(s) in the agreement and keep records as evidence of organic farming practices.

Record keeping requirements differ depending on whether land is certified as 'organic', 'in-conversion' or 'applying for a new conversion'. The organic schedule and certificate as supplied by the Defra-approved organic control body (OCB) are legal proof of registration and provide verifiable evidence of the land status as 'conventional', 'in-conversion', or 'fully organic'. Organic management or conversion payments are only available to applicants who are 'active farmers' as defined under Pillar 1 in regard to eligibility for Basic Payment Scheme payments.

The following evidence requirements apply for organic support under Countryside Stewardship.

Fully organic at the time of application:

- all applicants must provide a valid organic certificate and schedule issued by a Defra-approved OCB with the application. In addition, annual OCB inspection reports must be made available on inspection and a copy submitted on request; and
- agreement holders must maintain OCB registration, and submit a valid organic certificate and schedule, with the annual claim.

Conversion payments:

- a valid certificate and schedule, and a completed OCB-approved conversion plan must accompany the first annual claim. Each subsequent annual claim must be accompanied by a valid certificate and schedule; and
- the completed and OCB signed off conversion plan must cover all land and enterprises entered for ongoing support under Countryside Stewardship organic options and be submitted with the annual claim for the year that conversion begins.

New conversion:

- if applying for a 'new' conversion at the time of application, for those yet to register with an OCB and yet to complete an initial inspection and OCB-approved conversion plan (due to timing of conversion) the following documentation must be provided:
 - a fully completed **organic viability plan**
- at the time of the first annual claim, a completed conversion plan approved by the OCB (covering all land and enterprises entered for ongoing support under the organic options) must be provided as well as a valid organic certificate and schedule.

3.3 Photographic evidence

For some multi-year options and capital items dated photographic evidence is required to support an application, claim, or as part of the record-keeping requirements for an agreement, and must either be provided or made available by the applicant or Agreement Holder on request, including as part of administrative record checks and during inspections. The requirement for dated photographic evidence will depend on the particular multi-year option or capital item, but the following general principles will apply:

Application stage

Some multi-year options and capital items require supporting dated photographs (for example, of a particular feature or site) when they are included in any application. Applicants will need to check the individual option or capital item requirements.

During work stage

For certain capital works, listed below, dated photographs will need to be taken of the site during the different stages of the construction or build to show that the minimum specification has been met; alternatively it will be acceptable to submit contracts, invoices, or other documents confirming the technical specification for the completed works have been met. This evidence needs to be submitted as part of any claim.

Code	Capital item
HE2	Historic building restoration
LV3	Hard bases for livestock drinkers
LV4	Hard bases for livestock feeders
LV5	Pasture pumps and associated pipework
LV6	Ram pumps and associated pipework
LV8	Pipework associated with livestock troughs
RP3	Watercourse crossings
RP4	Livestock and machinery hardcore tracks
RP6	Installation of piped culverts in ditches
RP7	Sediment ponds and traps
RP8	Constructed wetlands for the treatment of pollution
RP9	Earth banks and soil bunds
RP12	Check dams
PR13	Yard - underground drainage pipework
RP14	Yard inspection pit
RP15	Outdoor concrete yard renewal
RP24	Lined biobed plus pesticide loading and washdown area
RP25	Lined biobed with existing washdown area
RP26	Biofilter
RP27	Sprayer or applicator load and washdown area
WN3	Ditch, dyke and rhine restoration
WN5	Pond management (first 100 sq m)
WN6	Pond management (areas more than 100 sq m)
WN8	Timber sluice
WN10	Construction of water penning structures

Claim stage

For multi-year option photographs, a sample of Agreement Holders will be requested to take dated photographs as part of an annual sample. Those required to take photographs will be given notice of which options require photographs, when they should be taken and the final date for the return of the records.

For capital items, all Agreement Holders should take a dated photograph after the works have been completed and send it with the payment claim. The capital works listed in the table above also require dated photographs of the construction or build to show that the minimum specification has been met; alternatively it will be acceptable to submit contracts, invoices, or other documents confirming the technical specification for the completed works have been met. Capital works that cannot be visually checked after completion; such as concreting or underground pipework invariably require photographs during construction. Agreement Holders should follow individual capital item guidance.

For management options, photographs are only required where the agreement holder has been asked to do so by Natural England. Advance notice will be given.

Photographic evidence quality

All photographs must meet the following standards: general requirements apply equally to digital photographs or those supplied as paper photographs:

- quality of the photograph – photographs must be in focus and clearly show the relevant option, capital item or environmental feature. Images submitted by email should be supplied as JPEG files. Digital images should not be smaller than 600 x 400 pixels and ideally the image file size no larger than 400 KB. Printed photographs may be submitted to the Natural England office processing the application or agreement. Printed photographs must be submitted on photographic paper and be no smaller than 15 cm x 10 cm. Photographs may be supplied in either portrait or landscape orientation as best suits the subject.
- photograph to identify the environmental feature, land management option or capital item(s) concerned – it is the responsibility of the claimant to provide sufficient evidence that the investment or required management has taken place, for example:
 - more than one photograph may be required where the option, feature or capital item exceeds the frame or is not clearly evident from a single photograph;
 - it is good practice for the image, where possible, to include a significant feature to provide authenticity; ditch, fence, farm building, road, telegraph poles;
 - it is good practice, where possible, to mark the photographed feature location, and direction from which the photograph has been taken, with an 'X' and an arrow on a copy of a map (or map extract) of the agreement area;
 - it is good practice, where scale or continuity is key, to include a feature, or introduce one. For example a quad bike, vehicle or use a sighting pole (2m high with 50cm intervals marked in red and white) and to take pictures consistently from the same spot for before and after photographs of the capital item or option.

Clearly label photographs

Use the Ordnance Survey (OS) map sheet reference and National Grid reference for the field parcel, followed by the relevant proposed or implemented option or capital item code and, if more than one image is required, the image number.

The OS map sheet reference and National Grid reference should relate to the field parcel on which the feature, option or capital is sited or for boundary features the adjacent field parcel. For example, with 'before and after' photographs submitted to support capital item **Gateway relocation (RP2)** the image should be labelled as XX12345678_RP2_1 and XX12345678_RP2_2. If there is no relevant land parcel reference the label can include a clear identifiable description such as Farmyard_RP22_1.

Digital images should be saved under the label outlined above. Printed photographs should have the label clearly written on the reverse.

3.4 Business viability test

For certain kinds of applications, particularly for significant capital expenditure, Natural England may make additional checks on the financial health and viability of an applicant. Further details will be notified to those who will be affected.

To ensure applicants are able to fulfil their agreement commitments, Natural England may check that applicants aren't in financial difficulty. It is also important that we can demonstrate that public investments are financially viable, and for significant capital expenditure we need to ensure that grant funding is given to businesses able to undertake the commitment.

For all applications, a check against an insolvency register will take place.

For applications including capital expenditure of over £50,000, we need to check that the applicant is financially viable:

- for all applications including more than £50,000 of capital items, the applicant must submit a statement from a chartered accountant confirming that the business or SBI has the resources from trading profits, reserves or loans to undertake the works according to the proposed agreement schedule.
- for all applications including more than £500,000 of capital items, in addition to the above requirement, Natural England will review 3 years of accounts to confirm that the applicant has the administrative, financial and operational capacity to fulfil the agreement conditions.

Applications which are judged not to be financially viable may not be offered an agreement.

3.5 Recommended fertiliser management system

The use of a recommended fertiliser management system across the farm is an eligibility requirement for some Countryside Stewardship options such as [Arable reversion to grassland with low inputs \(SW7\)](#). Applicants wishing to use such options must either:

1. demonstrate that they are utilising a recommended fertiliser management system across the farm; or
2. seek advice to adopt a recommended fertiliser management system within 18 months of the start of the agreement; or
3. demonstrate that they qualify for exemption as a low intensity farmer.

The following explain how 1, 2 and 3 are defined.

1) Demonstrating the use of a recommended fertiliser management system

Where required, applicants and agreement holders must hold sufficient farm records and documentation to demonstrate that they are using a recommended fertiliser management system and that nutrient management planning is taking place. Farm records must confirm that:

- applications of nitrogen and phosphate fertiliser to each crop in each field are planned before any nitrogen or phosphate fertiliser is applied; and
- periodic soil testing is carried out on relevant areas (every 5-7 years).

These records must be available on request or at inspection. Further information about planning tools and advice for recommended fertiliser management systems is set out in [Annex 1](#).

2) **Seek advice to adopt a recommended fertiliser management system**

Applicants who cannot demonstrate that they are already following a recommended fertiliser management system will be required to obtain advice, in order to implement one across their farm within 18 months of the start of the agreement. Advice is available from the [Farming Advice Service](#). Agreement holders will need to demonstrate that they are actively implementing a fertiliser management planning system throughout the life of the agreement and be ready to submit records on request or make them available on inspection. Agreement holders can source advice (at their own expense) but it must be from a suitably skilled agronomist or adviser. Further information about potential tools and advice is set out in [Annex 1](#).

3) **Demonstrate exemption as a low intensity farmer**

Applicants are exempt from this requirement if they demonstrate that they are farming at a low intensity across their management or production unit or farm site. In such cases, applicants must meet all of the following conditions:

- at least 80% of the land is grassland;
- no more than 100 kg N/ha per year as organic manure is applied, including what is applied directly to the field by animals;
- no more than 90 kg N/ha per year as manufactured fertiliser is spread; and
- no organic manure is brought onto the farm site.

When calculating the fertiliser application rate, applicants must exclude any area of the farm site where no fertilisers are spread or soil cultivated (eg rough grazing).

Applicants will need to keep adequate records to show that they qualify as a low intensity farmer on the farm site and submit them on request, or make available on inspection. If fertiliser records are not held for each field parcel, there must be sufficient information recorded to demonstrate compliance with the above low intensity farmer criteria. For further information on low intensity exemption applicants should refer to Annex 1 Part A of the Nitrate Vulnerable Zones (NVZs) guidance - Guidance on complying with the rules for NVZs in England 2013 to 2016 at <https://www.gov.uk/government/publications/nitrate-vulnerable-zones-in-england-guidance-on-complying-with-the-rules-for-2013-to-2016>.

3.6 Runoff and soil erosion risk assessment

Applicants must identify field parcels at risk of runoff and or soil erosion on their Farm Environment Record (FER), which must be submitted with their application. The runoff and soil erosion risk assessment must be kept as part of farm records and submitted to Natural England on request or made available on inspection. A [template](#) is available for recording the risk assessment.

3.7 Soil testing

Some Countryside Stewardship habitat re-creation or restoration options, such as grassland and heathland, require information on soils to help determine whether a site is suitable and eligible for the option and to provide a baseline against which progress can be judged. Soil sampling and analysis must be carried out prior to submission of the application for all proposed field parcels and the results of the soil analysis must be submitted with the application.

For supported Higher Tier applications NE will pay for the sampling, and the soil analysis must be undertaken by a soil testing laboratory as discussed with a Natural England adviser. For Mid Tier and unsupported Higher Tier applicants must submit soil samples to a laboratory at their own expense.

The laboratory analysis must include:

- pH (water);
- available phosphorus (P) using the Olsen method;
- available potassium (K);
- available magnesium (Mg);
- total nitrogen (N) using the Dumas method;
- organic matter (by loss on ignition); and
- a hand soil texture.

The P, K and Mg results should be quoted in milligrams/litre.

The date of soil sampling must be less than 3 years before the agreement start date. The soil analysis report must provide, in addition to chemical analysis results, details of the field or parcel number, the farm location and specify the depth at which the samples were taken. A copy of the soil analysis report must also be held as part of farm records.

Further soil sampling and analysis may be undertaken throughout the lifetime of the agreement by a Natural England adviser or Rural Payments Agency (RPA) Inspector during site visits.

Soil sampling must be to the correct depth, which is 7.5cm for grassland and 20cm for arable soil, and representative of the parcel. The sampling methodology specified in [Technical Information Note No 35](#).

3.8 Identifying species richness of grassland

For a small number of semi-improved or species rich grassland options, applicants must submit a declaration of qualifying criteria. A [template](#) for assessing eligibility for permanent grassland with very low input options has been developed for applicants to keep a record of qualifying criteria. Its use is not obligatory and agreement holders can use their own preferred format to meet these requirements.

3.9 Specifications

A number of the management options and capital items require a bespoke specification to be developed for the work. Each specification will be tailored to the requirements for the individual option and capital item in discussion with the Natural England adviser. As a guide, the specifications are likely to include the following:

- technical design drawings to illustrate the extent of the work or schedule of works to provide an itemised list of the component parts and or process for implementation; and
- describe the standards to which each category of work is to be carried out.

Applicants should follow option and capital item guidance in the [CS grants tool](#) and [PDF documents](#) on GOV.UK for further information on the submission of the specification.

3.10 Cost quotations

A small number of capital items payments are based on actual costs and are paid at a percentage rate. These actual cost items require quotations, which identify the cost for the required work, to be provided. A minimum of 3 quotations (as set out in the capital item specification) must be obtained in writing. Quotations must be submitted on application and an adviser will confirm in discussion with the applicant the chosen supplier. In exceptional circumstances involving highly specialised works fewer than 3 quotations may be accepted, but this must be agreed by Natural England in advance. Actual cost works must be agreed with Natural England or Forestry Commission before inclusion in any application.

3.11 Invoices

When claiming for capital items based on actual costs, agreement holders must submit receipted invoices (that show payment for materials and contracted work) with the claim.

The following standards apply:

- provide original receipted invoices for the purchase of every item claimed; and
- invoices can only be considered as receipted if they are annotated with some form of acknowledgement that the company or individual providing the goods or services involved has received the payment. The following also provide acceptable evidence:

- receipts in the form of a till receipt from a retailer and for purchases of standard, off-the-shelf items. These do not need to be separately receipted as paid because a receipt of this nature is only issued after payment; or
- if receipted invoices are not available, a copy of a bank or credit card statement which shows the work has been paid for in full when supported by the invoice.
- an invoice is only acceptable if the document is an original, or a computerised carbon copy on an original letterhead, and bears the supplier's official receipt (which could be a stamp, a signature or with the payment details shown on a computer printout of the invoice), confirming or annotating that the value of the invoice has been paid;
- all costs must be clearly attributable to each individual claimed capital item;
- goods that are purchased second-hand (where the agreement specifies that second-hand items are acceptable) or that have been distance-purchased (eg over the internet) also need to have receipted invoices provided for them, unless they are standard off-the-shelf items as described above, in which case the standard receipt for payment is considered adequate; and
- the invoice must not pre-date the start date of the agreement: if it does Natural England reserve the right to reject all or some of the claim.
- Where the agreement holder has used their own labour for construction, time sheets must be kept, and for actual cost items must be submitted with the claim.

Invoices and time sheets do not need to be submitted when claiming for all other options and capital items (that are based on fixed cost). Receipted invoices and time sheets must be retained and made available on request, including those for specific capital expenditure related to a management option, such as seed purchases.

3.12 Keeping farm records

Agreement holders are required to record certain management activities as part of specific management option prescriptions. The record keeping requirements are published in the [CS grants tool](#) and as [PDF documents](#) on GOV.UK. These farm records must be made available on request. Typical activities which have to be recorded include:

- cutting, topping, grazing, burning, harrowing, rolling or tramline disruption;
- ploughing, cultivation, seeding, planting or crop rotation;
- application of fertiliser, manure, pesticides, herbicide, lime, desiccants, insecticides or fungicides;
- livestock grazing;
- supplementary feeding;

- clearance works, bare ground restoration, drainage works and management, ditch management, or historic buildings maintenance work;
- wildlife assessment record;
- pesticide application method; and
- hedge cutting. (This includes keeping a record of the scheme requirements that agreement holders must not cut more than 50% of all hedges in or bordering agreement land in any one calendar year).

Note: where the option includes a requirement not to carry out certain activities during the year (eg no grazing, no pesticide application), agreement holders do not need to record the absence of these activities. Agreement holders will be required to complete a declaration on the annual claim form to confirm that they have met this requirement.

Where there is an existing statutory or farm assurance scheme requirement to maintain relevant records, these records can be used as evidence eg:

- plant protection product application records can be used to verify timing of applications and what products have been applied,
- NVZ requirements for nitrogen planning and recording of nitrogen applications.

Existing farm records (eg those already kept as part of commercial farm activities and planning) can be used where these already meet scheme requirements. This may include pesticide records, nutrient management plans, the use of manure and fertiliser, stock and grazing records. The existing records must cover the complete requirements of the Countryside Stewardship prescription. Where the scheme requirements are not covered by existing farm records, the agreement holder will need to keep an additional record. Examples include:

- where the use of pesticides (including herbicides) is prohibited or restricted to dealing with a particular problem such as injurious weeds or to a particular method such as weed wiping or spot treatment, agreement holders should check that appropriate information is included as part of their Pesticides Record under 'other/additional information'.
- some prescriptions restrict applications of manufactured fertiliser to specified levels of phosphate and potash; in these cases agreement holders within an NVZ would need to record the application of phosphate and potash in addition to the application of nitrogen.

Alternatively a farm diary template is being developed with the industry to help agreement holders record the right information in the right way eg livestock grazing. This template will be made available later in the year. Its use is not obligatory and agreement holders can use their own preferred format to meet these requirements.

As part of the annual claim form, agreement holders will be required to sign a declaration that they have maintained the required records to evidence scheme delivery, and that these records will be made available on request.

3.13 Keeping woodland records

Agreement holders are required to maintain certain records for all woodland management options. These must be provided with grant claims when requested by Natural England. Typical activities which should be recorded include:

- deer management and cull figures;
- open space and ride management;
- thinning, felling and coppicing;
- regeneration; and
- any other general woodland management.

4. Framework for scheme control

We are required by European regulations to make sure that the Countryside Stewardship scheme is properly controlled, to protect public money.

Our control framework includes 4 types of checks, some of which are new: administrative record checks, rapid field visits, agreement monitoring visits, and inspections.

4.1 Administrative record checks

We will check all stages of the application and claim processes, including application forms, claim forms and the nature and quality of supporting evidence, such as receipts and farm records. The emphasis is on ensuring eligibility requirements are met at application stage, and that various forms and records match up during the whole agreement period.

As part of the administrative checks on annual claims, a percentage will be selected for follow-up checks of agreement holder records, and the claimant may be asked to submit copies of on-farm records for checking. Also, selected agreement holders will be asked to supply photographs for some land management options. Agreement holders will be given reasonable advance notice of when photographs should be taken and the final date for return of records.

Where records are not provided on request, or there are discrepancies, they shall be treated as a breach of the agreement.

4.2 Rapid field visits

These are new, and are part of the administrative checking process. RPA, Natural England or Forestry Commission staff will make rapid and focused visual checks, targeted at specific options or capital items. These visits may include record checks and soil sampling.

4.3 Agreement monitoring visits

Natural England and Forestry Commission advisers will routinely visit sites to monitor environmental progress or in response to agreement holder requests. The focus will be sites requiring technical specialist input, such as complex habitat restoration and creation or where stocking is essential to environmental outcomes. Historic England may also visit sites with Scheduled Monuments or historic options **Reduced-depth, non-inversion cultivation on historic and archaeological features (HS3)** and **Restricted depth crop establishment to protect archaeology under an arable rotation (HS9)**. Results from monitoring visits will be discussed or shared with agreement holders.

4.4 Inspections

Each year, RPA will carry out compliance inspections on a sample of agreements, as required under European regulations, to ensure scheme requirements have been met. If an inspection finds a breach of the rules, it may lead to reductions and penalties being applied, and further details can be found in the CS manual.

5. Measuring CS option areas and widths

This section outlines how and where CS applicants and Agreement Holders should start to measure the areas and widths of CS options, and where they can be placed in the field parcel in relation to cross compliance and Ecological Focus Area (EFA) requirements:

- Please note the strict eligibility rules for EFAs that are not covered by this document (*see p37 of the BPS Handbook 2015*);
- CS options cannot be used to deliver mandatory requirements under BPS - CS Options have to go beyond the requirements of cross-compliance;
- EFAs – farmers can use the same EFA buffer strips to meet the greening and cross compliance rules;
- Cross compliance requirements apply to ALL Countryside Stewardship Agreement Holders irrespective of whether or not they are in receipt of BPS;
- Cross compliance will not however apply to agreements covering only stand-alone capital items where BPS is not claimed.

If you use certain CS options as EFA areas this would be 'double funding' and there will be a reduction in the payment rate to remove the double funded element, as set out in section 3.14 of the CS Manual.

For details please refer to the

- BPS Handbook – https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/406452/BPS_Handbook_-_final_v1.o.pdf

For information about the specific cross compliance rules which apply to EFA watercourses and hedgerows please see the GAEC 1 and GAEC 7a pages in the current version of the Guide to Cross Compliance in England.

- Cross Compliance Handbook – https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/397044/Cross_compliance_handbook_v2_web.pdf

Various exemptions apply and these are not covered in this document.

5.1 The relationship between CS buffer strip options and Cross Compliance: Examples of where to start measuring CS options

This section applies to CS buffer strip options SW1-4, WD3, and WT1-2 as listed below:
The general principle is that the CS buffer strip may not overlap with the cross compliance strip.

Arable:

- 4m to 6m buffer strip on cultivated land (SW1);
- In-field grass strips (SW3);
- 12m to 24m watercourse buffer strip on cultivated land (SW4);
- Buffering in-field ponds and ditches on arable land (WT2); and
- Woodland edges on arable land (WD3).

Permanent grassland situations:

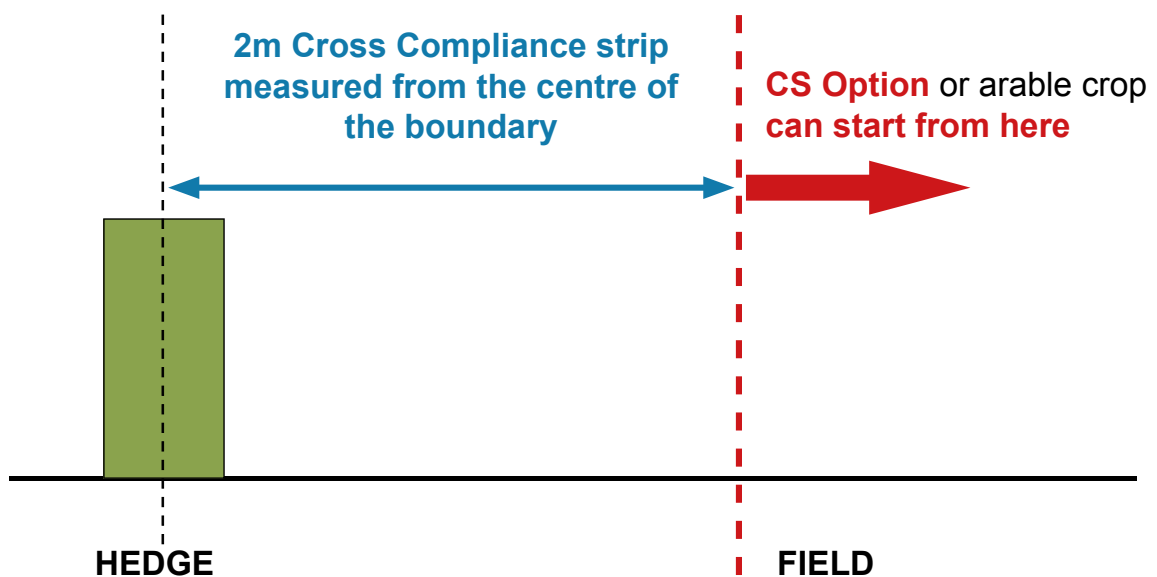
- 4m to 6m buffer strip on intensive grassland (SW2); and
- Buffering in-field ponds and ditches in improved grassland (WT1).

CS options adjacent to a hedge

Diagram 1

Where to start measuring CS options in relation to cross compliance requirements where the boundary feature is a HEDGE

In Arable and Permanent Grassland situations



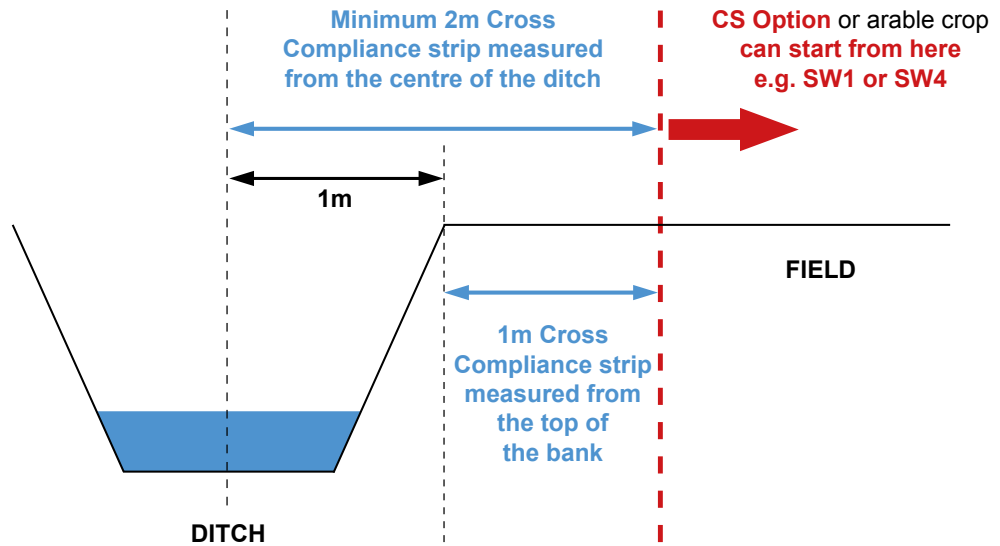
NOTE: If there is a fence adjacent to the hedge then different rules apply depending on whether it is more or less than 3m from the centre of the hedge. If the fence is more than 3m away from the centre of the hedge, and there is no management between the hedge and the fence, then the fence effectively becomes the new boundary. If the strip between the hedge and the fence is more than 3m wide it needs to be treated as a separate parcel.

CS arable options adjacent to a ditch

Diagram 2 – ditch measures 2m maximum width

Where to start measuring CS options in relation to cross compliance requirements where the boundary feature is a DITCH and the distance from the centre to the top of the bank is 1 metre.

In Arable and Permanent Grassland situations



SW1 is a 4-6 m buffer strip on cultivated land

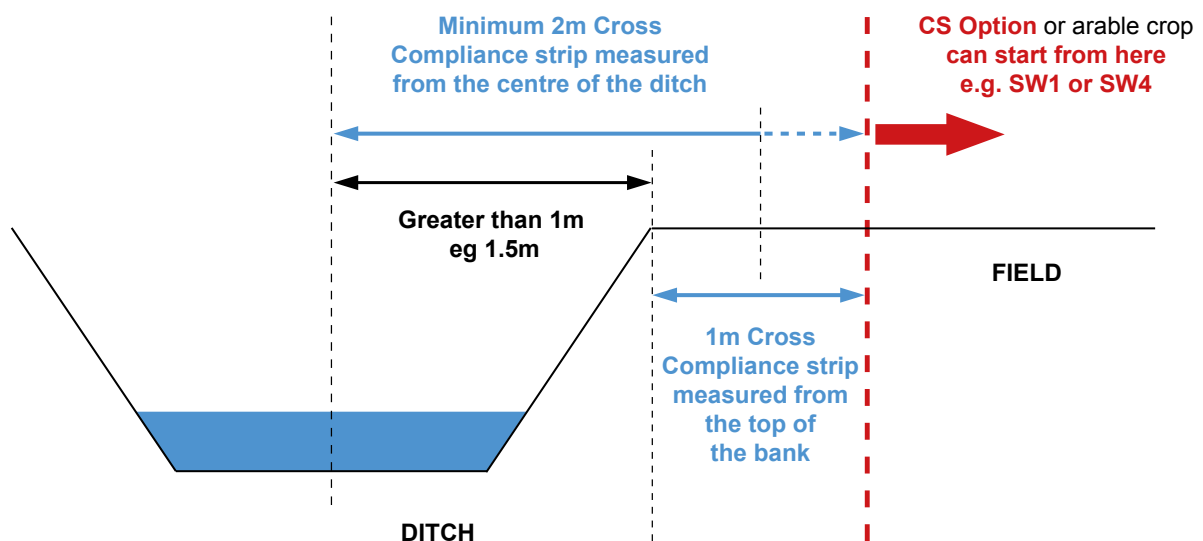
SW4 is a 12-24 m watercourse buffer strip on cultivated land

In this example the cross compliance strip would be 2.0m wide measured from the centre of the ditch.

Diagram 2a – ditch wider than 2m

Where to start measuring CS options in relation to cross compliance requirements where the boundary feature is a WIDE DITCH and the distance from the centre to the top of the bank is more than 1 metre.

In Arable and Permanent Grassland situations

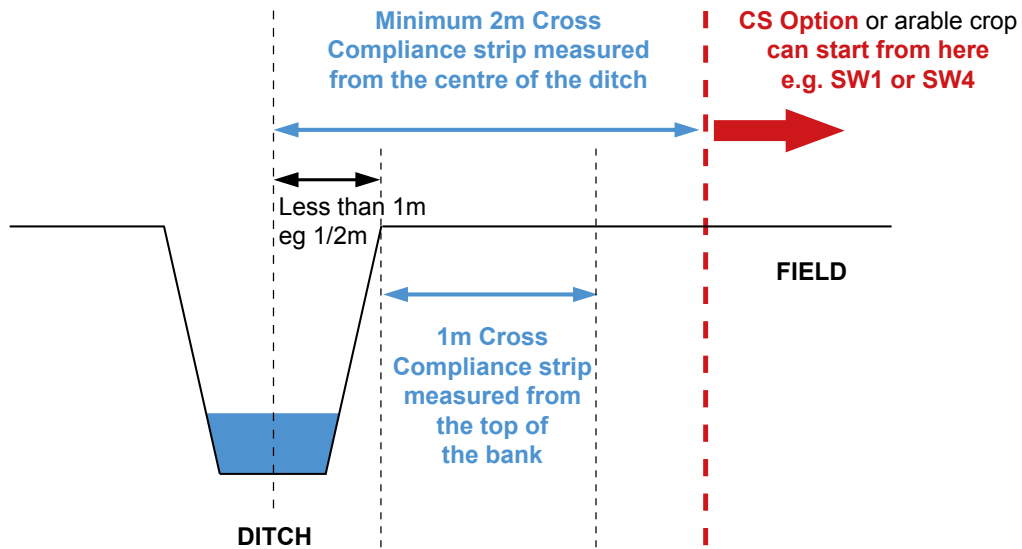


In this example the cross compliance strip would be 2.5m wide from the centre of the ditch.

Diagram 2b – ditch less than 2m

Where to start measuring CS options in relation to cross compliance requirements where the boundary feature is a NARROW DITCH and the distance from the centre to the top of the bank is less than 1 metre.

In Arable and Permanent Grassland situations



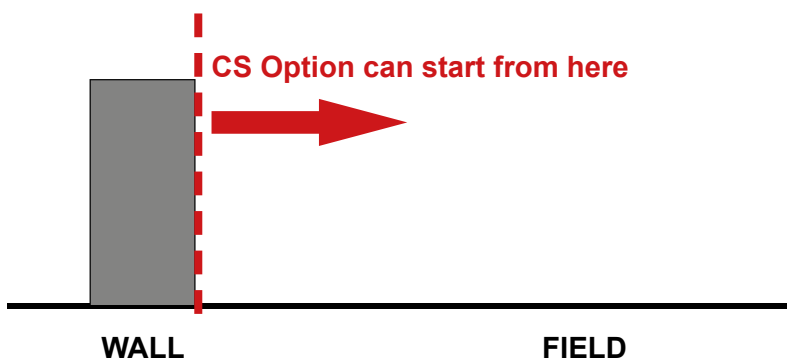
In this example the cross compliance strip would be 2.0m wide from the centre of the ditch.

CS options adjacent to a wall or fence

Diagram 3 – wall or fence where there is no cross compliance strip required

There are no cross compliance requirements where the boundary is a WALL or FENCE.

In Arable and Permanent grassland situations



CS option can start immediately next to the wall or fence (but allowing access around the field as necessary).

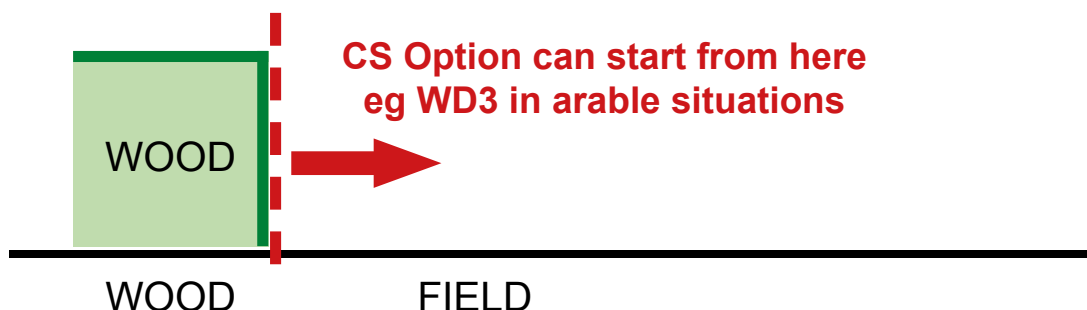
NOTE: If there is a ditch on the field side of the wall, this becomes the cross compliance feature and diagram 2a/2b applies as appropriate.

CS options adjacent to a wood

Diagram 4

There are no cross compliance requirements where the boundary feature is a WOOD

In Arable and Permanent Grassland situations



CS option can start immediately next to the wood

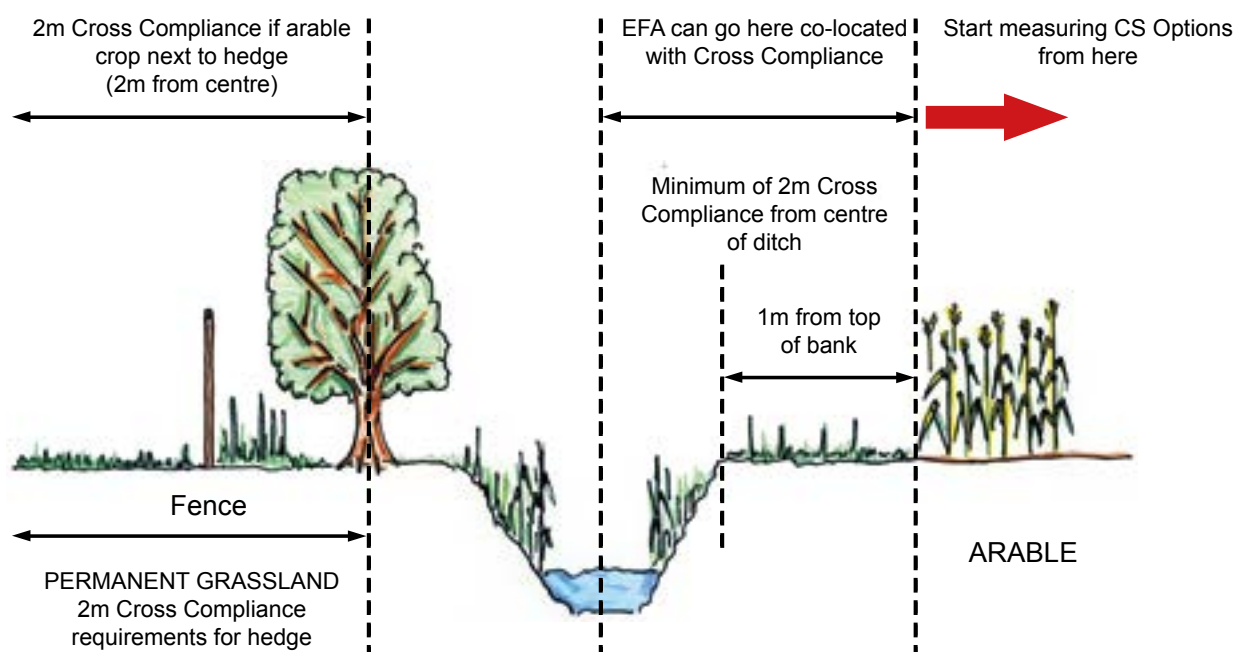
WD3 is Woodland edges on arable land 6m

NOTE: If there is a ditch on the field side of the wood, this becomes the cross compliance feature and diagram 2a/2b applies as appropriate.

Real World example

Diagram 5

Cross Compliance in an Arable situation against a Ditch and Hedge



5.2 The relationship between CS options, Cross Compliance and Ecological Focus Areas (EFAs): Examples of where to start measuring CS options

CS area based options and area based EFA options can be co-located in the same parcel, but CS buffer strips must not overlap with cross compliance and EFA requirements.

RULE: None of the 19 CS options detailed on p19 of the CS Manual can co-locate on an EFA area based option without a payment reduction.

EFA area based options are:

- Fallow land
- Catch crops and cover crops
- Nitrogen-fixing crops

Diagrams 6 are based on diagram 2

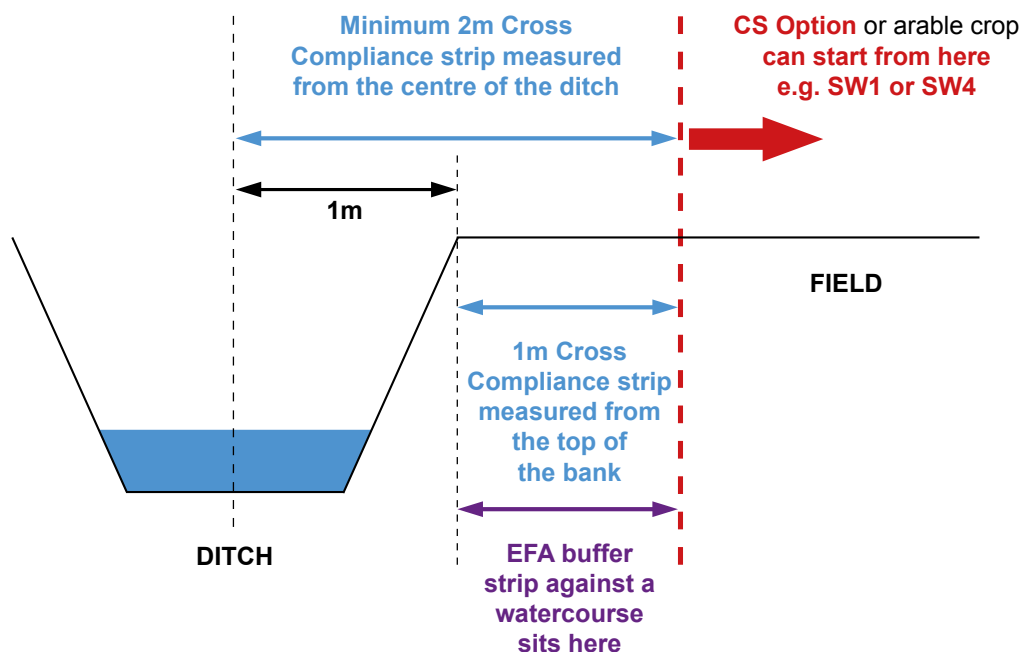
Where to start Measuring CS options in relation to Cross compliance requirements where the boundary feature is a DITCH with an EFA buffer strip against a watercourse

In Arable and Permanent Grassland situations

Start measuring CS options areas or widths where the cross compliance requirements and EFA requirements stop.

No EFA overlap with the CS option so no payment reductions would be required

Diagram 6 – centre of the ditch to the top of the bank is 1 metre



SW1 is a 4-6 m buffer strip on cultivated land

SW4 is a 12-24 m watercourse buffer strip on cultivated land

Diagram 6a – centre of ditch to top of bank is more than 1 metre

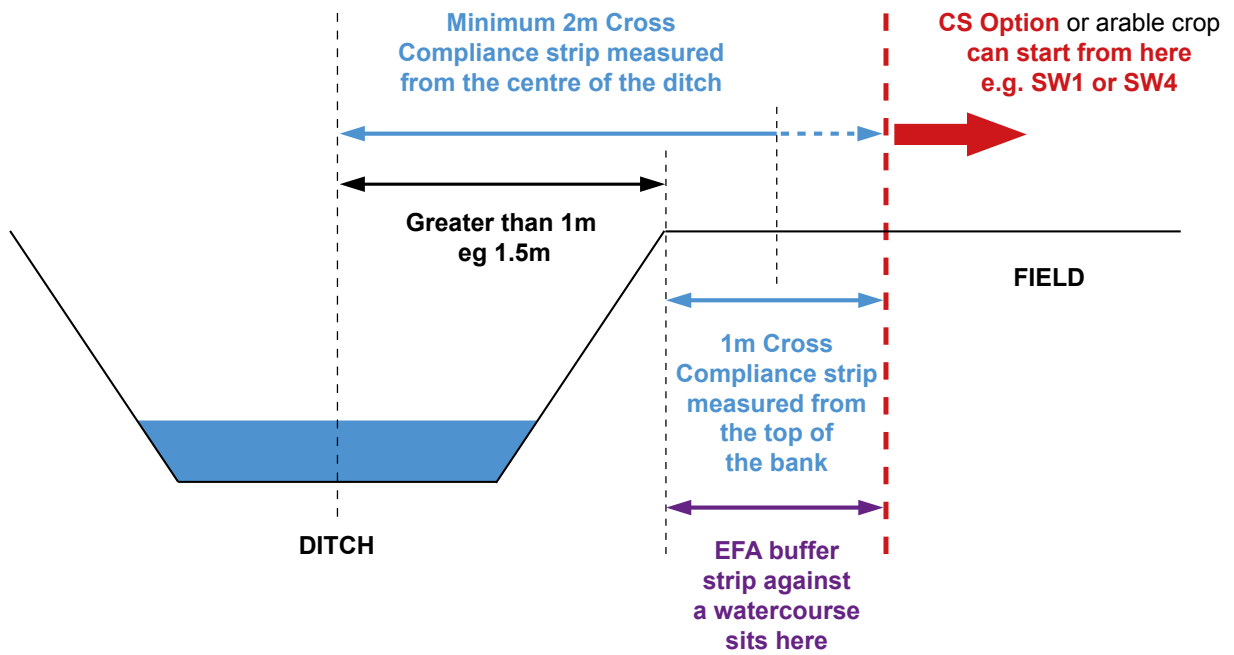
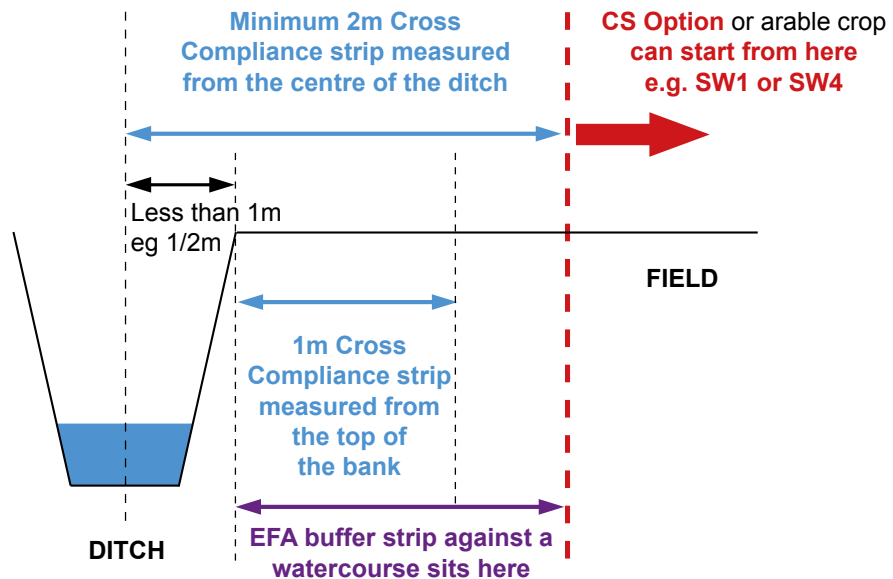


Diagram 6b – centre of ditch to top of bank is less than 1 metre

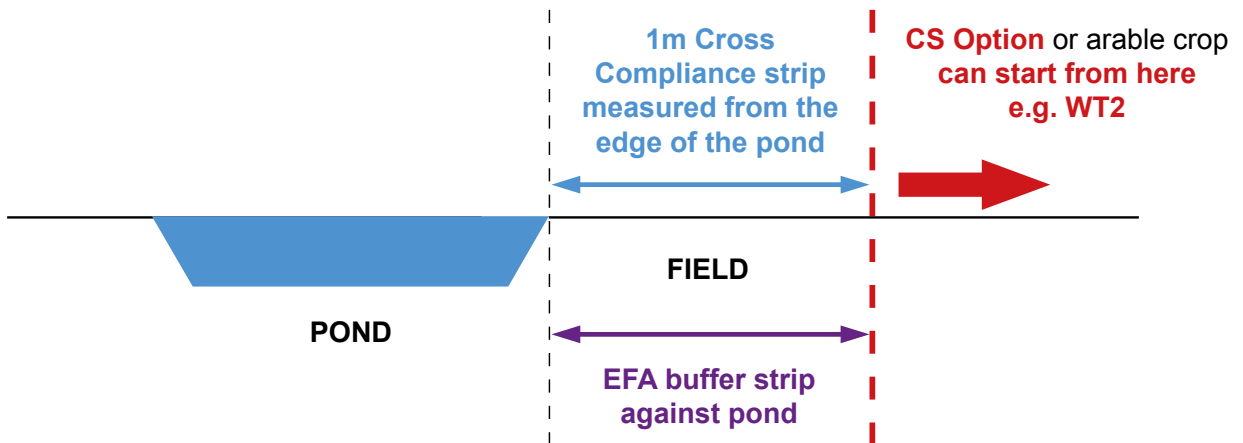


CS options adjacent to a watercourse

A watercourse is defined under GAEC 1 as 'all surface waters, including coastal water, estuaries, lakes, ponds, rivers, streams, canals and field ditches. It includes temporarily dry watercourses'.

Diagram 7 – with cross compliance and EFA requirements.

Start measuring CS option areas or widths where the cross compliance requirements and EFA buffer strip requirements stop. The diagram shows there is no EFA overlap with the CS option so no payment reduction would be required.



WT2 is buffering in-field ponds and ditches on arable land (10 – 20 m wide grass buffer strip)

CS arable options and beetle banks

Diagrams 8 and 9

These diagrams explain the relationship between 1m of EFA buffer strips and the 3-5m wide CS beetle bank (AB3)

Any strip must meet both CS & EFA requirements.

Under EFA rules farmers can place a maximum of two EFA buffer strips on each side of a water course.

Where the infield EFA buffer strip overlaps with the use of AB3, start measuring the CS option areas or widths where the 1m EFA requirements stop.

Where the EFA strip overlaps with the CS option area, a reduction to the CS payment may apply as in diagram 9 below.

Diagram 8

No payment reduction to AB3 if the total width is more than 4m and less than 6m wide

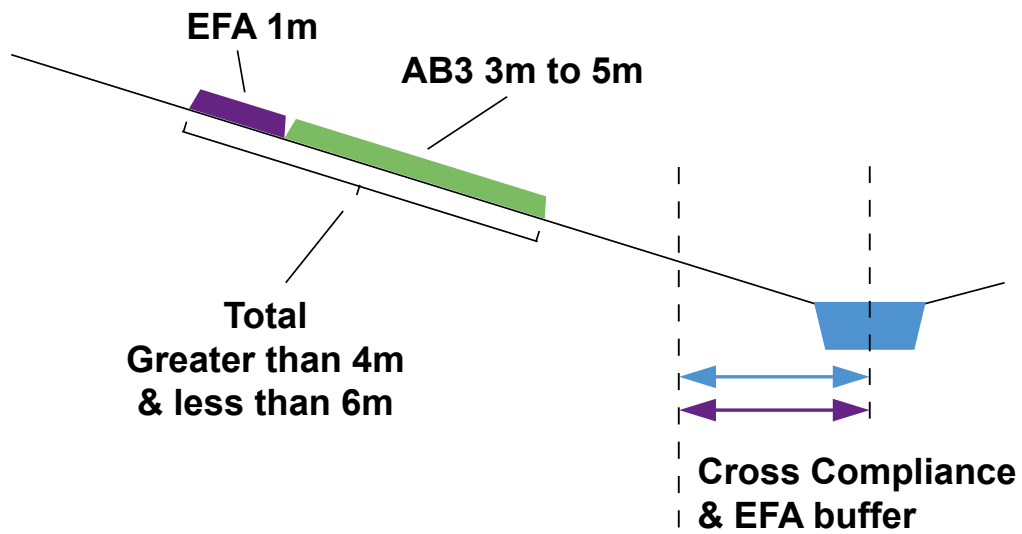


Diagram 9

A payment reduction to AB3 where the total width of the co-located EFA buffer strip and CS beetle bank is less than 4m wide.

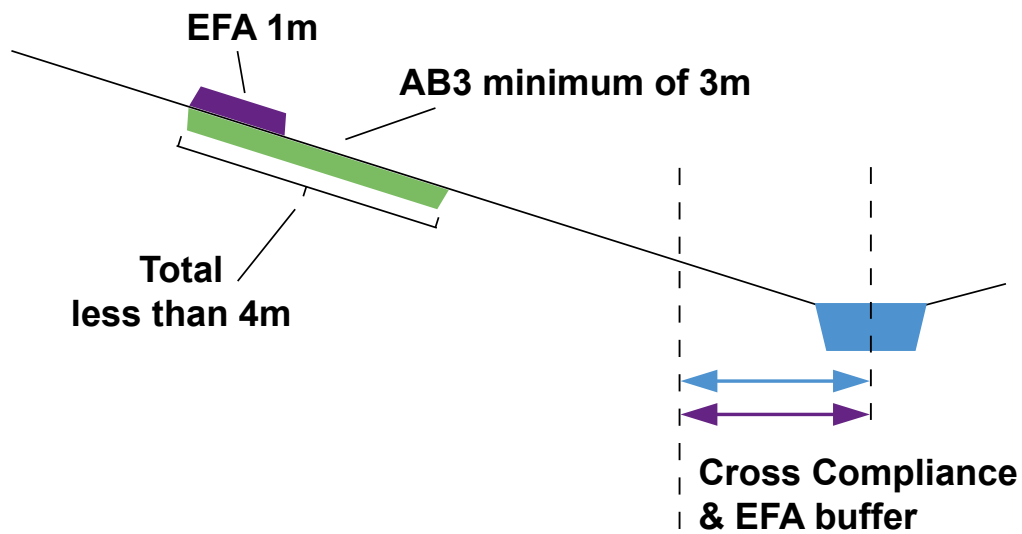
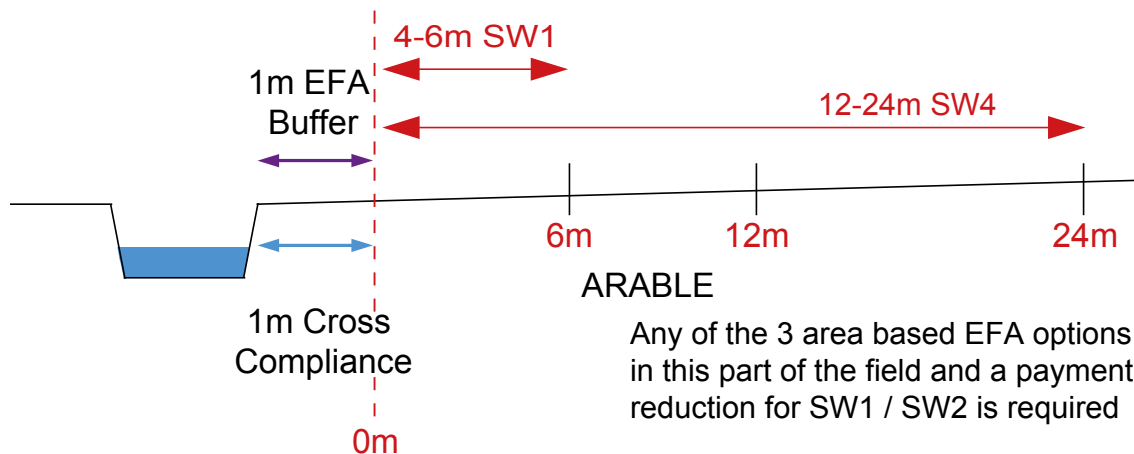


Diagram 10

How payment reductions to CS options SW1 and SW4 are required when co-located with area based EFA options



SW1 is a 4-6 m buffer strip on cultivated land

SW4 is a 12-24 m watercourse buffer strip on cultivated land

5.3 The relationship between whole field CS options and Cross Compliance

For whole-parcel CS options, the required option management will go further and require management additional to any cross compliance requirements. So no reduction of the area, in respect of cross-compliance, needs to be made when claiming for whole parcel options.

However, when a CS strip (e.g. buffer, grass margin, wild bird seed mixture etc.) is in the same field as a CS whole field option (AB1 to AB16) e.g. Basic overwinter stubble (AB2) applicants will need to deduct the area of the CS strip from the parcel area when applying for whole field options.

Annex 1: Guidance on use of recommended fertiliser management systems and advice offered

There are several recommended fertiliser management systems available, as well as guidance and advice, such as:

- RB209 (the Fertiliser Manual) which helps farmers and land managers better assess the fertiliser required for the range of crops they plan to grow. Other sources of fertiliser nutrient advice are also available; and
- The industry Tried and Tested Nutrient Management Plan - www.nutrientmanagement.org/home/

There are a number of tools available to help agreement holders comply with the requirement to plan farm nutrient use efficiently. These include:

- PLANET: a software tool to help farmers with field level nutrient management;
- MANNER NPK: a software tool that provides farmers and advisers with a quick estimate of crop available nitrogen, phosphate and potash from applications of organic manure. It is available at: www.planet4farmers.co.uk/Manner; or
- ENCASH: a software tool that allows farmers and advisers to calculate the nitrogen in manure produced by different types of permanently housed pigs and poultry.

All three software tools are on the PLANET website at: www.planet4farmers.co.uk.

There may be other packages providing a similar service.

There is also a wide range of advice available to help support farmers to improve nutrient management on farm:

FACTS-qualified advisers are qualified to give advice to promote farming systems that optimise crop nutrition and protect the quality of soil, water and air and farm biodiversity. The FACTS scheme is administered by Basis Registration Ltd, and a list of qualified persons is available from them on request at <http://www.basis-reg.com/contact.aspx>.

Catchment Sensitive Farming (CSF) operates in parts of the country where there are water quality issues linked to farming. Find out if you're eligible for [CSF support](#).



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