

Appendix to the SEA Statement: Defra's Response to the key points raised in the SEA Statement as part of the Strategic Environmental Assessment of the Rural Development Programme for England 2007-2013

The Table below summarises, in the left hand column, the key points identified by Fraser Associates that were made in both the Environmental Report, and in the response to the public consultation. These were summarised in Section 4 of the SEA Statement. The column on the right presents Defra's response to the issues raised.

	Issue identified in the SEA Statement	Defra response
1	Resources for Higher Level Stewardship (HLS) are likely to be insufficient to meet the aspirations of the Rural Development Programme for England 2007-13 (RDPE).	Resources available in the new programming period have risen but can not be unlimited. Over £600m has been made available for new HLS agreements within the lifetime of the Programme. This compares with £400m that was made available for new Countryside Stewardship (CS) and Environmentally Sensitive Area (ESA) agreements under the previous programme.
2	There are potential negative environmental impacts associated with the change from earlier agri-environment schemes (ESA and CS) to new schemes which will be supported by the RDPE. There is a need to consider how best such transitions can be managed.	Accept. This issue is being considered by the Environmental Stewardship (ES) Review of Progress. It is important that the environmental benefits gained over the last 20 years of agri-environment schemes are not lost. But it should be recognised that not all previous agri-environmental agreements will be suitable for HLS. Natural England (NE), the delivery body responsible for Environmental Stewardship has been asked to monitor the situation and report. Some agreements may be more suitable for Entry Level Stewardship (ELS).
3	HLS delivery staff should be qualified in all relevant aspects of the environment.	Delivery of the HLS will be led by Natural England who have delivery staff qualified in all relevant areas. However, whilst it is recognised that HLS agreements require a great deal of expertise, it is not necessary for advisers to be expertly qualified in all aspects provided they have access to suitable expertise.
4	Targeting mechanisms for HLS should be capable of supporting activities of high importance to one aspect of the environment; multiple gains may not always be appropriate or cost effective.	The issue of targeting is one area that is being considered under the ES Review of Progress. If necessary, modifications to the programme will be prepared in the light of the outcome of the Review of Progress.
5	The ES review should take account of environmental dimensions which are likely to rise in importance in the future, including water and waste management, as well as climate change.	The ES review will seek to ensure that ES is delivering its objectives and consider how the contribution of ES to climate change adaptation and mitigation can be increased.
6	Landscape issues should be considered more explicitly in both the Programme and SEA.	Maintaining and enhancing landscape quality and character is an objective of agri-environment schemes. Because of the broad coverage of ELS, it is expected to have a positive impact on the landscape through the cumulative effect

		of the uptake of ES options. The ES review will seek to ensure that the landscape objective is being achieved. The review includes a workstream examining how to improve the targeting of HLS to better achieve its objectives, including that of enhancing landscape quality.
7	Agri-environment schemes should be seen to contribute towards all aspects of sustainable development. To achieve this, social and economic impacts should be considered in the delivery of agri-environment and woodland schemes.	Agri-environment expenditure is solely focused on environmental objectives. However, included within the ES evaluation plan is a study of the socio-economic impacts of agri-environment expenditure. This study is expected to begin within the next year. Previous small scale reports have provided evidence that restoration of hedges, stone walls and barns brings significant socio-economic benefits to the local economy and maintains and creates employment of traditional rural skills. In delivering agri-environment and woodland schemes, Natural England and the Forestry Commission will work with other partners, at regional level, to maximise the potential for integration of objectives.
8	Greater emphasis could be given to social and economic factors in the RDPE through re-allocation of funding to Axis 1 and 3.	The RDPE is the main mechanism of its type which can be used to improve the environmental management of farming and forestry. The main focus of other public sector support through (for example) local authorities and Regional Development Agencies (RDAs) is already on socio-economic issues and the level of resource which could be made available through the RDPE would, in any case, be limited in comparison.
9	Animal welfare issues should be included to a greater extent in the Programme.	We recognise the importance of good animal welfare standards in the farming industry. Under the theme of making agriculture and forestry more competitive and sustainable, one of the areas of focus could be increased opportunities for training to improve animal welfare standards. We do not believe that making use of the Programme to make annual payments for animal welfare commitments represents the best way to achieve our objectives.
10	Delivery mechanisms, particularly for Axes 1 and 3 are of critical importance. Decision-making structures should involve economic, social and environmental partners	RDAs have worked closely with the other delivery partners to develop Regional Implementation Plans (RIP), which include shared and integrated priorities for the regions across all the Axes. Funding decisions made for Axes 1 and 3 will be based on these RIP priorities and the RDAs are also likely to be working with their delivery partners in development of projects. The RDAs are also responsible for managing the Leader approach. RDAs are already working with

		Natural England and the Forestry Commission in the selection of these groups and both partners will continue to play an important role in ensuring that the Local Action Groups are considering all the pillars of sustainable development in their local development strategies.
11	Application materials and associated guidance for projects under Axes 1 and 3 should reflect a horizontal environmental approach, in addition to social and economic criteria.	Regional Development Agencies, who will be responsible for the delivery of projects under Axes 1 and 3, implement a sustainability check for projects they support. Checks include assessment of the likely environmental effect of a particular project.
12	Specific arrangements may be needed for projects which support energy crops, given the unique nature of environmental impacts associated with them and also taking into account the need for a coherent supply chain to maximise both economic and environmental benefits.	Applications to establish energy crops will be subject to individual environmental appraisal. This will include landscape, effect on surrounding dwellings, historic environment, soil, biodiversity, operational access, recreation and public access and water/drainage. In addition, an end use for the crops will need to be identified. Support for small capital projects and supply chains may be forthcoming under Axis 1 or 3 and there will be liaison between NE and RDAs. Energy Crop 'Opportunity maps' for England are on the Defra website ¹ . These indicate areas where the crops are likely to give a high, medium or low yield and are overlaid with areas where planting should be avoided or where other issues need to be considered.
13	The coverage of Axis 1 should be revised to include anaerobic digestion as a process to produce biogas for energy production, which will be supported.	Accepted. The RDPE Programme Document has been amended accordingly.
14	Mechanisms to ensure co-ordination between different public sector strategies and funding streams should be introduced.	The rationale behind the decision to transfer responsibility for socio-economic funding to the RDAs was to better integrate rural business support under the RDPE with the RDAs' wider economic development responsibilities. The RDAs will be able to take a strategic overview of the support offered in the region, to ensure co-ordination between different public sector strategies and funding streams. This will be complemented by the governance arrangements for the RIPs, which will bring various regional deliverers and stakeholders together to discuss the best use of RDPE funds.
15	Mechanisms should be introduced to ensure a consistent and integrated approach to Programme delivery across all 3 Axes and to facilitate support for national or multi-regional projects.	We have emphasised the importance of close working between our delivery partners. In each region, delivery partners have worked with a wide range of stakeholders to develop integrated Regional Implementation Plans. Multi-regional projects are possible and

¹ www.defra.gov.uk/farm/crops/industrial/energy/opportunities/index.htm

		proposals should be discussed with RDAs.
16	The capacity for the Programme to support horticulture should be made more explicit.	Under the 1947 Agriculture Act, the meaning of "agriculture" includes horticulture as well as a range of other activities.
17	Monitoring information for the RDPE should include qualitative as well as quantitative information, including, for example, on public attitudes. Quantitative information should be expanded to consider, among other issues, sustainable tourism, climate change emissions and socio-economic outcomes. Indicators should be in place at the start of the Programme to ensure consistency.	Additional suggestions made focus largely on context indicators, which are affected by a wider range of actions than those funded through the Programme. There is an issue about the extent to which such indicators can therefore be used to monitor the Programme as a whole, or individual activities supported. Defra will examine this issue in more detail and make recommendations to the Programme Monitoring Committee by the start of the Programme. Considerable information will be collected on ES, in addition to that required under the Common Monitoring and Evaluation Framework. This will include qualitative and quantitative information.
18	The use of existing administrative structures, such as Local Area Agreements or Area of Outstanding Natural Beauty management groups, would help reduce the need for additional administration associated with the Programme. Widening the availability of expert staff assistance, as is the case under HLS, would also help applicants deal with administrative and management issues.	We agree that administration associated with the RDPE should be kept to a minimum and delivery partners may be able to make use of existing structures as one way of achieving this. Delivery partners will employ specialist staff who will be available to provide assistance and guidance for applicants.