



Department
for Environment
Food & Rural Affairs

Environmental Land Management Policy discussion document

Analysis of responses

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Authors: Blue Marble Research

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ffcpengagement@defra.gov.uk

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Introduction

Defra published the Environmental Land Management (ELM) Policy Discussion Document (PDD) to set out its initial thinking for ELM scheme design, providing an update on progress and an overview of high level design options. The PDD was initially launched on Citizen Space on 25th February 2020 but was subsequently paused on 8th April 2020 due to the unfolding situation with COVID-19. The PDD was re-opened on 25th June 2020 with a revised closing date of 31st July 2020. In addition, Defra sent correspondence to all current members of the Rural Payments Agency's customer list inviting them to participate.

Stakeholders were invited to respond to 11 open-text questions posed in the PDD. A total of 1,672 submissions to the discussion were received as outlined in the table below.

Submission type	Number
Citizen Space	1,379
Email	282
Paper/mail	11
Total	1,672

Of these 1,672 responses:

- 39 removed from the analysis (duplicates, empty or irrelevant responses);
- 10 identified as part of a Horse Access campaign (their views are represented in the section on Public Access and Rights of Way);
- 209 identified as part of a Rewilding Britain campaign (these have been analysed separately and a summary of the responses are included in Appendix 1)

This document details the findings from the remaining 1,414 submissions. All Citizen Space submissions and emails/paper responses which followed the 11 open-ended question structure were coded using a thematic code frame developed to provide an indication of the weight of opinion for each question. Longer submissions of Key Stakeholders and unstructured submissions were reviewed against the thematic code frame.

The analysis approach taken is outlined in Appendix 5; it should be noted that this was primarily a qualitative exercise to identify key themes arising from the submissions. Where appropriate we have provided an indication of the proportion of submissions mentioning specific issues to demonstrate the weight of opinion. However, since this was not quantitative research exercise these proportions are not statistically robust and should be treated as indicative.

The composition of 1,414 submissions by stakeholder type is outlined in the table below:

Stakeholder type	Number	%
Land managers	820	58%
<i>Including:</i>		
Farmers - general	445	
Tenant farmers	20	
Foresters	30	
Farmer – arable	16	
Farmer – beef	4	
Farmer – dairy	7	
Famer – mixed	26	
Farmer – organic	7	
Farmer – sheep/lamb	6	
Farmer – upland	9	
Farmer – hill	4	
Other	482	34%
<i>Including:</i>		
Individuals	107	
Advisors/consultants	67	
Academics, researchers	30	
Environmental groups/charities	53	
Special interest groups	54	
Private companies	27	
Lobby group	61	4%
Defra arm's length	21	1.5%
Defra internal	4	<0.5%
Other Government Dept	4	<0.5%
Not stated	22	1.5%
Total	1,414	

N.B. Many respondents did not give further details other than 'land manager' or 'other'

In this document we highlight where views of different respondent types were markedly different, primarily focusing on the land managers and 'other' respondents.

61 submissions were received from individuals representing 28 of Defra's Key Stakeholders (listed in Appendix 4). Where these responses differ from the main body of responses this is drawn out in the commentary and highlighted in the Key Stakeholder Chapter.

Report structure

The following chapters are in line with the original structure of the questions. Key themes emerging from the responses to each question have been highlighted and direct quotations from submissions which illustrated more widely held views are included. Finally, there is a chapter dedicated to 7 specific policy themes identified during the analysis.

Executive summary

The submissions represent a range of different stakeholder perspectives and interests resulting in a wide variety of viewpoints and very specific comments on how ELM should be developed and amended. The most apparent difference is between members of the farming and agricultural community (whose responses tend to focus on highlighting the importance of food production and ensuring the financial viability of farming in the UK) and stakeholders with an environmental and conservation focus.

The most prevalent themes from across the submissions are summarised below.

There is widespread support for the design principles, however this support often comes with reservations. The design principles that resonate most strongly, or where respondents would like to see enhancements are: Principle a) environmental outcomes; Principle d) inclusivity and fairness; Principle e) flexibility and options; and Principle f) minimal complexity and administrative burden.

Views on whether the scheme as currently proposed will deliver on the objectives are less positive (particularly amongst 'other' respondents) with around one in five being uncertain and one in five who do not think it will deliver.

The two major areas of scepticism surrounding both the principles and objectives are:

- A lack of ambition;
- A lack of detail, leaving uncertainty about how the scheme will operate in practice.

The areas most frequently suggested as factors to be included within the principles or addressed by the objectives (and are reoccurring themes throughout the submissions) are:

- Greater recognition of food production (or explicit mention of balancing environment and food production);
- Ensuring sufficient financial support and payment for land managers;
- The inclusion of the principles of rewilding.

The key barrier to participation is perceived to be poor previous experience of agri-environment schemes (followed by payment/financials not being viable, complexity, fear of administration/ bureaucracy and farmers' mindsets). The corollary is reflected in the primary factors needed to encourage participation: adequate financial incentives; and making the processes easy and simple. (Other recommendations to encourage participation include the provision of advice, minimising the administrative burden, ensuring inclusivity and flexibility, and building trust with land managers.)

Broadly speaking the majority agree with the types of activity in each tier, though most highlight some caveats or areas they would like to see addressed. There is a call for tier 1 to be more inclusive, including a wider range of options and to be more ambitious. There are no clear or consistent suggestions for amending tier 2 – although a selection of

disparate ideas is suggested. In terms of tier 3, the most frequently made comments relate to its accessibility and particularly that it should include regenerative farming.

Facilitation support and a single point of contact to take ownership and play a coordination role is needed in order to support land managers to work together at tiers 2 & tier 3. There is also a call for impartial expert advisers 'on the ground' who have local knowledge.

Respondents want to see flexibility in the approach to calculating payment rates for ELM and support the idea of different mechanisms operating across the different tiers. There is no clear consensus about the best means for calculating payment rates with most supporting the use of a combined calculation - most frequently including elements of income foregone plus costs, outcomes-based payments and paying for actions.

The majority of respondents who expressed a view are positive about the opportunities to blend public and private finances. By far the greatest opportunity is thought to be carbon offsetting, followed by working with water companies and other types of environmental offsetting. However, caution is raised about private companies potentially influencing objectives and that it should not lead to reduced public funding.

There is significant appetite for advice with the majority of respondents thinking that advice will always be needed. Responses indicate that demand for advice will be greatest during the transition to ELM; for land managers during the pre-application and application process; and for more complex schemes.

Of those that expressed a view **the vast majority support the use of self-assessment** and support is particularly strong amongst land managers. The majority support the use of photos (and to a lesser extent videos) as evidence, especially as part of a dedicated web based or mobile phone app for location and date tagging. However, any IT solution needs to account for landowners with low IT skills or poor access to internet/mobile coverage. The use of satellite imagery and remote sensing divides opinion.

There is overwhelming agreement that piloting is valuable and should happen. The primary elements that respondents think should be tested are: the payment and rewards system; the outcomes and effectiveness of the scheme; the approach to monitoring; and the ease of the application process.

Key stakeholders

As with other stakeholders there is a noticeable difference between Key Stakeholders representing the farming and agriculture and those that are environment and wildlife focused. Some common themes can be identified (outlined below), although most are less strongly endorsed by some of the farming based Key Stakeholders.

- Be more ambitious;
- Ensure ELM is universal and accessible to all land managers;
- Provide a detailed route map for transition with thorough piloting;

- Only reward activities that are above and beyond the regulatory baseline;
- Move towards whole-farm and whole-systems approach;
- Concern about the inclusion of income forgone payment calculations and the need to move towards natural capital approaches.

Analysis of responses pre - post COVID-19 pause

Overall, between the 'pre-pause' and 'post-pause' phases of the discussion, there were no clearly significant changes in sentiment towards the ELM proposals or the nature of what respondents discussed in their responses. However, there were some signs of certain topics and themes becoming slightly more prominent post the COVID-19 pause:

- Indications of slightly more mentions of inclusivity when it comes to overall design principles and in encouraging participation;
- Indications also of slightly more orientation to including local stakeholders and communities in the process of how to determine local priorities;
- Indications of slightly greater concern around the level of financial support post the COVID-19 pause – notably with slightly more respondents calling for payments to go beyond income foregone. This may reflect greater underlying economic anxiety; however, this is not a dramatic shift from the outlook pre the COVID-19 pause;
- There are some underlying signs of a slightly greater desire for (human) support. Again, this is not a step change, but across questions around how to assist collaboration and how monitoring should work, there are signs that respondents are mentioning support and advisers and 'human touch' a little more than pre the COVID-19 pause. Also signs of slightly more emphasis on advice at the initial set up / start of ELM.

There are a few topic areas which specifically reference COVID-19 as having a direct influence, although in all cases only mentioned by a handful of respondents, and not enough to change the overall weight of response pre to post the COVID-19 pause:

- COVID-19 as a reason to emphasise **food security**;
- COVID-19 demonstrating the negative impact of **public access**;
- COVID-19 as posing a threat to the prospects of blending of **private finance**;
- COVID-19 familiarising farmers with **remote communications**.

Regional summary

There are no dramatic variations in response to the PDD by region: the picture is much more one of consistency than disparity. However, analysis does draw out evidence of some slight variations in opinion by region, summarised below:

North West: Slightly more circumspect than some other regions about the principles and objectives. The views that ELM needs to be more ambitious, and that the PDD lacks detail, are both slightly more prominent in the North West. There are also some signs of

greater anxiety in this region than average, and a slightly greater call for advice and to receive guidance.

North East: A little more emphasis on wanting farmers to be involved and to build trust. Signs that this region has a slightly stronger desire for an improved relationship with administrating bodies in future, and to feel fully included in ELM policy.

Yorkshire and The Humber: Tend to be more negative or have more caveats about ELM principles, objectives and the tier activities. However, respondents in this region are more positive than average about some aspects that give more empowerment / autonomy e.g. blended finance and self-assessment. Profitability and replacing BPS are slightly more prominent concerns here. There's also a little more acknowledgment of the need for advice, particularly on complex schemes.

West Midlands: Slightly more polarised than average on sentiment to the overall principles of ELM and a little more emphasis than some other regions on good, reliable payment sources and systems (this is also the least positive region when it comes to blending private finance).

East Midlands: A little more positive towards ELM than some other regions, slightly more locally or collaboratively minded and some interest in tier 3 – but slightly more mindful that it needs to be kept easy to understand and accessible.

East of England: Responses from this region include more thoughts around payment mechanisms and financing than other regions. However, there is not a consensus within the region on the best mode(s) of payment.

South East: Little to distinguish this region from the overall set of responses, other than slightly more focus on rewilding than the norm.

South West: The region with the most submissions and therefore 'weight' in the overall set of responses. A little more negative overall about the principles and potency of ELM than average, but no major deviations from the 'norm' in terms of feedback on features of the scheme.

Design principles

Q6. Do you have any comments on the design principles on page 14? Are they the right ones? Are any missing?

Widespread support for design principles, but with caveats

In responding to this question many respondents took the opportunity to discuss their overall response to the PDD - or mention specific areas of interest or concern to them and their organisation - rather than explicitly address the design principles. Overall, around three in five expressed an opinion on whether they supported the design principles as a whole and of these the vast majority (c. four in five) support the design principles.

There is widespread agreement that ELM provides a great opportunity to deliver on environmental outcomes and many believe it is a refreshing change from previous schemes - and there is general support for the overarching principles. None of the individual design principles outlined in the PDD were rejected by a significant proportion of respondents. However, this support is often couched in terms of it being dependent upon additional suggestions, amendments or greater emphasis on specific elements being put in place. Supportive statements tend to have a proviso: *'providing that...'*. There is a view amongst a significant minority (and particularly amongst academics/ researchers, farm advisers/consultants and special interest groups) that ELM should be more ambitious in terms of its timescale, remit and linkages to other policy areas and requires greater urgency of action. Key Stakeholders are more likely than other stakeholders to want to see ELM be more ambitious and innovative.

'I feel the design principles are by and large well-constructed though whilst in a world that is focused on the short term, 25 year goals might seem to be taking a long term view, in reality it is a very short term approach. Changes and benefits to the geographical environment need to be considered in a much longer time frame.'

Advisor or consultant, East Midlands

'The design principles are surprisingly unambitious, considering the scale of devastation of soils, wildlife and wild habitats due to intensive farming in this country, and the failure of the current government to take immediate and serious measures to address carbon emissions. The ELM offers a clear opportunity to surpass the CAP related stewardship principles and aims and this should be explicitly stated as a guiding principle.' **Individual, South East**

Additionally, many respondents who appear to be supportive of the underlying principles of ELM as laid out in the PDD reserve their final judgement until they have seen further detail - or see how the scheme plays out in reality. There is strong call for more detail amongst Key Stakeholders.

Design principles with greatest resonance

Not all submissions referred to each of the principles, however, the principles that were most frequently supported either directly in response to this question or indirectly across responses to other questions are discussed below.

Principle a: Focus on achieving environmental outcomes, helping to deliver our 25 Year Environmental Plan and net zero target. In doing so, it will help farmers, foresters and other land managers optimise the potential of their land to deliver public goods, as part of a thriving food or other land-based business

There is both implicit and explicit support for the broad principle of working towards the 25 Year Environment Plan, the focus on environmental outcomes and the concept of 'public money for public good'. Although there are no widespread or strong negative views expressed in relation to this principle, around one in ten responses called for further clarification or enhancements to be made. This is particularly the case amongst Key Stakeholders. There is a need for more detail and greater clarity around the definitions of the specific environmental outcomes ELM aims to achieve and details on specific 'public good'. Respondents mention a wide range of specific issues they would like to see mentioned more explicitly or given greater emphasis within the PDD. These include: healthy soils; carbon capture/carbon sequestration; raising understanding and awareness of environmental issues amongst farmers and general public; biodiversity; heritage and cultural heritage; flood risk management; and commoning, amongst others.

The two areas most frequently cited which respondents would like to see included in the list of public goods covered by ELM are: rights of way and (sustainable) food production.

The inclusion of - and stronger emphasis on - rights of way is most frequently mentioned by special interest and lobby groups such as the Horse Access Campaign, Ramblers and Local Access Forums. There are indications that the COVID-19 pandemic has highlighted the importance of access to the environment, the natural world and open public space for the wellbeing of the nation and hence should be considered a public good.

'It is right to aim to enhance the natural environment but the public's access to it is not addressed. The COVID-19 pandemic has shown how important public rights of way and open public space is to the wellbeing of the public.' **Special interest group**

There is also a call primarily, but not exclusively, from land managers for food production and food security to be included as a public good. Again, the COVID-19 pandemic - but also the implications of leaving the European Union and the end of the transition period - are cited as reasons why it is increasingly important that ELM considers food production and sustainable food production within its remit.

'In your 'public goods' list (p7) you don't mention the fact that farmers' most important role should be to grow good FOOD for the UK population while improving soil health and greatly reducing use of chemicals, benefitting both food and environment. Particularly in the current circumstances, people are more and more keen to be able to access seasonal, locally grown and low 'food miles' food and we should urgently harness that for the good of our land. While I greatly welcome the environmental emphasis, since I run an environmentally sensitive farm, it must not occlude/take over the prime purpose of having improved soils and reduced chemical use on enough land to feed the UK with as much UK grown, healthy food as possible alongside saving our environment. It's perfectly possible to do both.'

Tenant Farmer, South West

There is a tension that can be found across responses to many of the discussion questions between a call for a greater recognition of the importance of food production and ensuring ELM is a financially viable scheme for farmers (as discussed below, a theme coming mainly from land managers) and a call for an even more ambitious and single minded focus on environmental outcomes (mainly from other stakeholders). Many of the environmental and conservation groups, lobby groups and charities, and key stakeholders express support for the focus on both the environment and payment for public goods. Indeed, many would like to see this go further to ensure that ELM does not become a farm support payment scheme or reward business as usual type activities. The PDD did not appear to adequately set out the policy on the potential trade-off between environment and food security for either side of the debate to be fully reassured.

Principle d: Ensure that ELM includes actions that most farmers, foresters and other land managers could deliver and encourage delivery of outcomes at all spatial scales through collaboration as well as individual participation.

This principle is commonly supported and often seen as critical to the success of ELM. Around one in ten explicitly express support for the principle; acknowledge the importance of inclusivity of the scheme; or want further reassurances that the scheme will be accessible for all regardless of farm type, land type or land tenure. This issue of inclusivity is seen to be particularly important at Tier 1. The proportion of submissions wanting as wide as possible eligibility is similar across all stakeholder types including: land managers; farmers; agricultural advisers and consultants; environmental charities and conservation groups; and lobby groups.

Within this one in ten, there are both general calls for ensuring that the full range of farm types, land type, land tenure, and type of land owner/manager are able to participate in the scheme and also more specific requests to ensure consideration has been given to a particular area of interest.

Those farmers, land managers and farming representative bodies that raise the issue of inclusivity appear more likely to focus their responses on ensuring that all types of farms and especially smaller farms are eligible for ELM including greater consideration about

how the scheme will ensure smaller-scale farmers are encouraged and supported to participate with Tier 1 activities.

'Ensure that ELM includes actions that all farmers - not most farmers - could, if they wish, deliver. ELM should be open to all.' **Tenant Farmer, East of England**

'We would question who might be excluded here. All relevant land managers do need to be able to access the funds to deliver public good from farming and farmland management. If small scale means a farmer or grower is less able - through difficulties with cost or time - to make an application, then while collaboration can be a way forward for some, this would need to be supported with external resource and we expect that government would budget for this and make appropriate resource available to those potential applicants.' **Farming Representative Group**

Other stakeholders, such as conservation groups and environmental charities, are most likely to raise the issue of ensuring different types of land managers are eligible - and a few pick up on the PDD wording in relation to Tier 1 which refers to farmers rather than land managers.

"It would be helpful if the principles could specifically cite local authorities, charities and community interest companies (CICs) as land managers who might be able to achieve environmental outcomes through the scheme." **Environment or conservation organisation**

"Tier 1 has a 'focus on actions that are deliverable on most farms' and is 'broadly accessible to all farmers' implying that other land managers (who may be able to deliver environmental benefits) are not included." **Environment or conservation organisation, East Midlands**

Another area in which respondents would like to see this principle strengthened is to 'ensure' rather than 'encourage' collaboration. The issue of collaboration is considered particularly important at the higher Tiers 2 & 3. Some respondents think further evidence is needed about how collaboration will be delivered - and how Defra will prevent the delivery of ELM objectives being 'stymied' by individual farmers that are unwilling or unable to participate – and allow for all farmers, regardless of farm type or land tenure, to access ELM.

Principle e: Enable farmers, foresters and other land managers to have greater flexibility over how they deliver environmental outcomes.

The principle around flexibility is well-received and for some seen as a refreshing or pleasant surprise to be included in the principles. The acknowledgement that 'one size does not fit all' is welcomed by all types of stakeholders. Respondents want the flexibility of the scheme to manifest itself in a range of ways:

- Acknowledge that different landscapes need different approaches and outcomes

- Take account of different climatic conditions
- Ensure a range of options or actions (i.e. not too prescriptive) available at Tier 1
- Allow for different farm types and sizes, including non-agricultural land
- Allow for flexibility over the lifetime of the scheme e.g. allow land managers to change and adapt their activities over time
- Allow for movement between the Tiers
- Take a pragmatic approach to monitoring

'If certain options were able to be added ad hoc on a yearly basis this would help land managers. This year is a good example where farmers may not be able to sow a crop - if there was an option to "last minute" put a cover crop in for that year and get some recompense rather than leave land saturated and bare for the rest of the year there would be better water and soil quality.' **Farmer, East of England**

'Point e) is very important as the present and previous schemes were too rigid with dates and stocking rates with the vastly changeable weather we now experience. The effect of lumping locally varied land types into a large group e.g. Upland, does not work well with these rigid rules. Much better to have this payment by results idea so that the individual farmer can make the best decision based on knowledge of his/her land.' **Upland Tenant Farmer, Yorkshire & Humberside**

Principle f: Ensure minimal complexity and administrative burden for participants and administrators, considering lessons learned from similar past initiatives.

A focus on minimising complexity and reducing administrative burden is well received and generally considered to be a laudable aim. Although some respondents express a desire for the structure of the scheme itself to be relatively simple (there is a perception that complexity and lack of understanding how schemes operate can act as a barrier to participation) it is more often expressed in terms of a need for simple and accessible processes. Respondents think it is important that the administration and paperwork associated with the scheme is not burdensome or bureaucratic – this includes the application process and the monitoring/inspection regime. (There is a call amongst a minority for a continual application process rather than having time bounded rounds of application periods with fixed dates.) Land managers are more likely than other stakeholders to endorse the importance of the inclusion of this principle within ELM.

Although most respondents who commented on this principle were supportive of the underlying idea, there was also some scepticism and cynicism about whether it will actually be achieved. This was often based on negative historic experiences with other schemes, particularly the Countryside Stewardship scheme.

'F' is critical as current CS scheme administration is overly complex and time consuming and appears driven by the capabilities of the underpinning IT system rather than achieving positive outcomes.' **Local Authority, East of England**

'As a farmer who has participated in environmental schemes for many years it has become increasingly obvious that the schemes have become far too complex and bureaucratic to appeal to farmers; the overzealous inspections have been a big issue in getting farmers to join up to many of the offerings; and there needs to be an understanding by those regulating these schemes that a degree of flexibility is built in to allow for the many changing conditions farmers have to operate in.' **Farmer, West Midlands**

Although the majority who commented supported this principle, there were a minority of respondents who had reservations. These stakeholders felt that a degree of complexity and administrative overhead may be necessary to ensure that the scheme can successfully deliver complex environmental outcomes (some habitats are not simple to manage) and demonstrate wise use of public money.

Design principles with less resonance

The following principles, where there were fewer direct comments - either positive or negative - appear to resonate less strongly with respondents.

Principle b: Ensure national and local environmental priorities are supported and balanced effectively.

The majority of comments relating to this principle accept the need to balance local and national priorities but go on to ask questions about the detail of how this will be achieved. Some express concern that it could lead to a 'postcode lottery' in deciding local principles and emphasise the need for local consultation. There is a desire for greater information about the mechanisms that will be used to decide on local priorities. For instance, what organisation or department decides what is or is not supported? And what is the appeal mechanism regarding these decisions? There is a call for an 'appropriate and objective framework' within which to define and evaluate comparative levels of priority at national and local levels. It is thought that to be successful, national priorities must be clear and sufficiently flexible to be relevant to a particular region or location; and that it will be essential to ensure local priorities are accepted by local farming communities. Additionally, failure to provide relevant and widely supported local outcomes could lead to less take-up and ownership of the scheme. Some mention that ensuring all three tiers work in tandem will be critical to achieving this principle.

Principle c: Ensure the scheme and its underpinning systems and processes work effectively and represent maximum value for money.

Comments relating to this principle include:

- Support for the idea of providing value for money for taxpayers;
- This should be alongside providing value for money/a reasonable return for farmers;

- Value for money should be considered over the long term (not just saving money in the short term);
- A sophisticated approach to calculating value for money should be used that can account for more complex or whole-system approaches.

Principle g: Seek to harness new technology and digital solutions where they are shown to add value and improve the scheme design and operation.

Only a small minority of respondents commented on this principle mostly raising a concern that the scheme should not rely on the use new technology and digital solutions for those land managers/ farmers who do not have the appropriate access, resources or knowledge, which is more likely to disadvantage smaller farmers.

'Ref g: Harnessing new technologies and digital solutions for scheme management has potential to focus delivery and outcomes but may be limited by availability or otherwise of the necessary infrastructure (poor mobile reception/broadband connectivity). Costs of employing advisers familiar with technology may outweigh the benefits of scheme participation for some land managers who may feel unable to engage with the technologies expected. This is perhaps more likely to be an issue for Tier 1.' **Environment or conservation organisation, East of England**

Principle h: Seek to continuously improve all elements of the scheme and its administration, through monitoring, evaluating, learning and innovating, while providing sufficient certainty and clarity to applicants.

Again, only a small minority of respondents commented on this principle. In most cases these comments were supportive of the idea of continuous improvements but included 'watch outs' for how it was implemented, such as:

- Changes to the scheme over time can damage trust with farmers (often based on historic experience of changing schemes);
- Ensuring sufficient time for smooth transition when any changes are brought in;
- It will require trusted, effective lines of communication with farmers;
- Ensuring that monitoring and evaluation processes are built in at the start of the scheme and do not change over time.

'The principle of making ongoing improvements to the scheme is supported, however updates shouldn't be retroactive. Farmers and land managers require certainty and consistency from any scheme to provide them with the confidence required to effectively deliver the intended outcomes. As a result, once terms are agreed, they should be set for the duration of the term, as was previously the case with Environmental Stewardship.' **Land Manager, South East**

Principle i: consider re-using / improving existing systems and data before building new

The majority of comments relating to this principle endorsed the idea of building on the aspects of existing schemes that worked well and not 're-inventing the wheel'. However, there was no consistent agreement about which of these schemes/aspects of the schemes should be retained.

Suggested additions and amendments

The most frequently identified areas that are missing from the principles are:

A greater recognition of the importance of food production: this is most commonly mentioned amongst land managers and farmers. Many believe that the issue of food security for the nation is of greater importance and has come into sharper relief due to both leaving the European Union) and COVID-19. As mentioned previously, some farmers would like to see food production defined as a public good.

Ensure sufficient funding/payment: a minority of respondents (particularly landowners and farmers) want to see the inclusion of an additional principle explicitly addressing the financial viability of implementing the scheme for landowners and farmers. (And for some this is about ensuring there is not a shortfall of funding in the transition from BPS to ELM.)

'A principle of 'supporting and incentivising farmers to achieve these environmental outcomes' would be beneficial.' **Tenant Farmer, South West**

Principles of rewilding: those responses which were identified as being part of the Rewilding Britain campaign (or heavily influenced by the campaign) call for inclusion of an additional principle to directly address rewilding. However, in addition to this a small minority of other respondents (<5%) would like to see rewilding explicitly addressed in the principles.

Providing high quality advice, support and a participatory approach: around one in twenty would like to see greater emphasis on the provision of advice and support to land managers and farmers within the principles. For these respondents, the success of the scheme is strongly dependent upon trusted advice and scheme promotion to improve uptake, buy-in and the delivery of environmental outcomes. They would like to see participatory approaches - such as facilitated, farmer-led groups - to design, implement and appraise environmentally friendly farming practices for maximum success and added value.

Other suggested additions to the principles include:

- Ensuring the scheme rewards (existing) good practice and is not detrimental to those performing well
- Higher profile for issues around public access and rights of way

A minority did not support the design principles

Around one in 10 respondents to the PDD did not, on balance, support the design principles or expressed significant reservations. The proportion of respondents expressing negative views of the design principles is similar across different stakeholder types, although the reasons for this appears to vary.

Land managers and farmers are more likely to feel the design principles do not include sufficient emphasis on supporting food production and sustainable food production. This is often expressed in terms of ensuring the country can be self-sufficient and a concern for food security. Some land managers would like to see food production explicitly acknowledged within the principles and identified as a public good. Land managers and farmers are also more likely than other stakeholders to express significant reservations about the complexity of the scheme – both in terms of its design and the anticipated administration. Linked to both of these issues, there is a call for the principles to explicitly address the financial viability of participating with ELM for land managers and ensuring that ELM does not damage the farming and food production sector.

'The first item should be with regard to ensure food is seen as a public good, with the aim of increasing the UK's self sufficiency, although it is known that we cannot grow all our food due to our climate there are many foods where we could provide a larger percentage of our requirements.' **Farmer, East of England**

'The principle should be the production of quality food in a sustainable and environmentally friendly way with proper recompense for the producer either from the purchaser or by way of subsidy. I note the words of the introduction (page 6 third paragraph) but they seem to have got lost in the rest of the document.'
Farmer, South West

Other types of respondents are more likely to criticise the design principles due to a lack of ambition or urgency and a desire to see the principles of rewilding, with specific emphasis on encouraging natural processes and habitat restoration.

'The missing principle is urgency. The latest science says that we are heading for 4degrees of warming. We need to get to zero carbon sooner.' **Academic or researcher, South East**

'There is no mention in the principles of supporting, protecting and restoring natural processes and biodiversity. If this is left out, it could lead to some damaging schemes being supported, and others that would be of great value being dismissed.' **Individual, West Midlands**

Those special interest and lobby groups that criticise the principals raise specific issues of particular interest to themselves (e.g. public access) which they would like to see included in the principles.

Delivery on the objectives

Q7. Do you think the ELM scheme as currently proposed will deliver each of the objectives on page 8?

Overall sentiment

The majority of submissions (around 8 in 10) expressed a view on whether they felt the proposal will deliver the objectives. The balance of opinion is favourable, but a significant proportion exhibit uncertainty or doubt. Of those who expressed a view:

- Over half believe ELM will be able to deliver the objectives (although many of these express caveats or conditions that would have to be fulfilled);
- Around one in five aren't sure either way;
- Around one in five do not think ELM will deliver the objectives.

The balance of opinion is generally similar across different stakeholder groups, although the general public express a less positive view and Key Stakeholders are more likely express reservations or uncertainty. The most positive sentiment on this question is found amongst land managers who are not farmers.

Nature of the discussion

Answers submitted do sometimes go beyond the intended scope of the question and span a wide range of points and agendas around the fundamentals of the scheme. There was some critique of the objectives themselves: some respondents felt the objectives needed to be revised or overhauled entirely; with some giving specific suggestions for how they felt they should be reworded.

Key areas of scepticism

There are two main areas of scepticism about the objectives and whether ELM will fulfil them:

1) Lack of detail

This was mentioned in more than 1 in 10 submissions, particularly by non-land managers (e.g. advisers and conservation charities / environmental groups. 'Lack of detail' can refer to both the objectives themselves (often described as 'vague') and the level of information in the PDD about how they will be delivered.

'These are far too vague. Objectives need to be measurable and specific. At best these are aims.' **Individual, East of England**

'Overall, we have limited confidence that ELM will deliver the two objectives set out on page 8 due to the lack of information provided in the Discussion Document. We require much more detail on payments, scheme structure, how outcomes can be stacked, length of schemes, nature of scheme architecture, capital works, monitoring and penalties. As ever the devil is in the detail.' **Environment or conservation organisation, North West**

Perceived lack of detail often causes uncertainty about whether ELM will deliver: respondents may feel there is not enough tangible information in the PDD to make a judgement. Key Stakeholders raise particularly strong concerns over the lack of detail in the proposals. Rewilders specifically raise concern that the dialogue used is too vague and not ambitious enough to reach climate targets.

2) Lack of ambition

'Lack of ambition' is a commonly raised theme (also mentioned by around 1 in 10). It is an especially widespread concern amongst **non-land managers**, who may have a dedicated interest in environmental outcomes (rather than the business of food production). This is clearly linked with the opinion that ELM will not achieve its objectives: 'lack of ambition' is twice as likely to be mentioned by those who exhibit negative sentiment or doubt.

There are two strands within this theme:

The first strand is whether the core objectives of ELM themselves go far enough, given the scale of the environmental challenges faced and the long-term efforts needed to address them:

'...tackle "some" of the environmental challenges, that will be open to interpretation. Surely our strategic goal should be to tackle ALL the environmental challenges, let's aim high and show people we really mean business!' **Advisor or consultant, South West**

'We note that the scheme overtly focuses on short term outcomes, but that environmental recovery is only sustainable with long term effort.' **Special interest group, South West**

N.B. The mention of 'short-term' in objective 2 is specifically queried in a number of submissions

The second strand is whether there is enough ambition within the detail of the scheme to fulfil the objectives: is there enough emphasis on transformational actions rather than mere good practice / business as usual? (This tends to be an issue raised more in the context of Tier 1.)

'I think the scheme is not enough of a stretch to actually make real change in the environment. Big changes like reductions in the reliance on pesticides/fertiliser to

improve water quality/soil quality/improve biodiversity would all be very welcome, but I see little mention of this.' **Farmer, Yorkshire and The Humber**

'Tier 1 public funding may be used for actions which are simply 'good farming practice' such as efficient use of pesticides, manure management, contour ploughing. These are just sensible measures to reduce pollution. This funding would be better spent on ambitious transformational practices rather than business as usual.' **Academic or researcher, West Midlands**

Key areas to consider and develop

Beyond areas of scepticism, there are a host of 'it depends' factors: areas that need further consideration and/or development if ELM is to succeed. The two most widely mentioned are:

1) Financial support and payments

Across most stakeholder types (although less so amongst the general public) many assert that achieving the objectives will depend on financial support and payments to land managers. Primarily the focus of these comments is ensuring land managers (of all types and sizes) can make a profit through their participation (...and in the absence of BPS). Key Stakeholders are more likely to raise the importance of ensuring the overall level of funding for the scheme from the Government is sufficient and that greater financial support is required to achieve the more ambitious objectives they would like to see.

'Only if this is sufficiently attractive to offer an additional income stream or at least one which offsets the loss of BPS.' **Land Manager, Yorkshire and The Humber**

Many also take a broader perspective of the need for adequate overall budgetary commitment to support the scheme, including both meaningful funding of direct payments to land managers (for all Tiers), and also funding other aspects such as advice, training and capital grants.

'It will deliver if there is enough funding available to do it properly and a new publicly funded programme of low-cost advice and support for a farmer-to-farmer advisory network, visits to demonstration farms, and training.' **Farming representative group**

Some give a range of more detailed thoughts on how to structure payment (in some cases emphasising different Tiers), while others single out that payments need to be prompt, and payment systems well organised.

2) Balancing environment and food production

This is a theme that features in around 1 in 10 responses, across all types of stakeholders. Some respondents (more likely to be farmers) are vocal about the scheme potentially

presenting a threat to UK food production / food security (with some references to this being a heightened concern post COVID-19).

'Concern that the government is too obsessed by "environmental benefits" without taking into account the importance of providing home grown/bred food.' **Land Manager, East Midlands**

Others (also including farmers) comment that environment and food production should not be viewed as mutually exclusive, and how sustainable / environmentally friendly food production should be a focal point for the scheme:

'...there should be a requirement that ELM encourages a symbiotic relationship between the environment and food production.' **Farmer, South East**

'The strategic objectives must include 'environmentally friendly food production' as farmers do understand what this means!' **Farmer, South West**

Other issues discussed

As mentioned above, this question prompts a wide range of responses. The following are other themes that we see mentioned less frequently (each one evident in around 1 in 20 submissions). These warrant mention as factors that significant minorities see as critical if ELM is to achieve the overarching objectives:

Make it simple / not too many options

- Complexity of scheme structure and too many options can be a hindrance to uptake – and therefore success: farmers should not have to employ advisers to be able to join;
- Having too many agencies involved is likely to hamper the scheme;
- There's also mention of keeping both language and systems easy to understand and use for all.

A need for measurement / evidence

- The need for a measured 'baseline' from which to measure progress;
- Measurable, quantifiable and monitored – to help focus efforts on achievement and to provide objective evidence of success.

Needs to be inclusive

- The scheme must not miss or exclude certain types of landowners:
- Concerns range from the smallest farms being excluded through to large (profitable) farms choosing to abstain;

- Issues with land managers not being able to participate in higher Tier schemes – hostage to what their neighbours choose to do;
- Needs greater mention of land managers / landowners other than farmers (e.g. urban fringe, forestry).

Rewilding

A contingent of responses (excluding the Rewilding Britain campaign – see Appendix 1 for detailed responses from rewilding campaigners) mention that re-wilding should play a (more prominent) part in ELM for it to achieve its strategic objectives. This view is championed mostly by members of the public and other non-land managers.

Will require (tailored / specialist) advice

Some responses highlight advice as essential for the objectives to be met. Within this theme the need for local, expert advisers is often outlined as a key enabling factor.

Other specific issues to consider

A collection of disparate specific issues that are considered missing or requiring greater emphasis include: public rights of way; prioritising water quality; animal welfare issues; addressing high intensity farming; soil quality; woodland management; social environment and heritage; common land.

Encouraging participation

Q8. What is the best way to encourage participation in ELM? What are the key barriers to participation, and how do we tackle them?

Barriers to participation in ELM

More respondents discuss ways to encourage participation than explicitly talk about barriers.

Primary barrier: poor previous experiences

This is the most widely, vividly (and sometimes bitterly) referenced barrier:

'The main reason that CS was undersubscribed was the convoluted method of application.... The level of bureaucracy has been scary to put it mildly.' **Adviser or consultant, South East**

'The Countryside Stewardship Scheme was very disappointing and having come to the end of our 5 years have not applied next year...it must be better organised.' **Farmer, Yorkshire and The Humber**

Past poor experiences include stakeholders' previous dealings with the Rural Payments Agency (RPA):

'The RPA is unpopular with farmers, having developed a reputation for unreasonable enforcement, fines and late payments.' **Defra arm's length body, North West**

'In the past the rural payment scheme has not functioned well.' **Farmer, North West**

The schemes mentioned in a negative light are primarily Countryside Stewardship (CS) and Higher Level Stewardship (HLS). CS was criticised as complex, poorly managed, punitive / heavy handed, inflexible, having onerous evidence requirements, being generally unattractive and hampered by slow payments. HLS was seen as too ambitious, too complex and too slow. In addition, some perceive that service/advice from Natural England (NE) has changed over time.

There are indications that certain sections of the farming community (e.g. tenant farmers, upland farmers) single out poor previous experience more than most, but we also see notable criticism of previous scheme administration amongst non-land managers (such as conservation bodies and private companies).

Secondary barriers

Beyond negative previous experience, there are a number of secondary barriers, each with a similar volume of mentions. Some of these, while less explicitly referencing previous experiences, do appear driven by experience and general preconceptions of government schemes, rather than solely reflecting what is expressed within the PDD.

Payment / financials not being viable

This can be an area of deep concern, potentially with livelihoods at stake, as BPS is phased out. There is anecdotal evidence based on small numbers that this is a bigger concern for certain types of farmers e.g. upland, tenant farmers. Payments (potentially focused on tier 1) need to be enough to allow these sectors to profit; and there is concern that income foregone in tier 1 alone will not suffice. In other cases, profitable farmers will need payments to be truly attractive in order to change their farming system. Additionally, those who have already changed land use to less productive land supported by grants will need to have this environmental action fully recognised in terms of future payment.

Hard to understand / complex

Along with many unspecific comments on 'complexity', various facets are called out: language used & jargon; being able to understand documentation (including the PDD itself); scheme complexity with too many options (that are only relevant to a few applicants); complex application process; and complex targets.

Fear of likely administration / paperwork / form filling

Often reflecting previous experiences, there is a common thread of concern that the administration will be time-consuming and that there will be too much of it. Respondents raise concerns about the expected time it will take to complete initial set up and ongoing record-keeping requirements.

'Currently I have land in the higher tier and am considering a further mid-tier application but am hesitating because the record keeping is excessive and doesn't demonstrate value for money to me. Not only is the actual setting up of the scheme time consuming and involved numerous visits from Natural England and months of questions, but the continuous requirement for detailed records such as stocking records, hay making records, remembering to take photographs at key points in the year - which always coincide with when we are at our busiest - should not be underestimated. This is on top of all the routine record keeping e.g. sheep movement, BCMS, medicine, difficult calving, mastitis, drying off, lame cow, etc.'

Farmer, Yorkshire and The Humber

Additionally, some specifics are given about poor, non-user friendly systems (e.g. time to complete data entry, double entry etc).

Farmers' mindsets

Some stakeholders - more likely to be some non-land managers e.g. advisers, but also some farmers themselves - raise farmer mindset as a barrier. This view may be framed negatively (e.g. inward looking, ageing farmers, stuck in their ways) or in a more constructive context: e.g. appreciating the uncertainty that farmers face and so default to what they know; recognising farmers have valuable traditions of expertise; understanding the lack of trust in schemes due to poor previous guidance; reflecting that some farmers see these schemes as a threat to their livelihood. These barriers can be mentioned in the alongside the need for trusted advice and education.

Two other barriers come up amongst a significant minority

Options too prescriptive

This was often mentioned in the context of existing / previous schemes (e.g. CS) rather than purely reflecting what is outlined for ELM. Being 'too prescriptive' can cover perceptions that schemes are overly single-minded; options that are too prescriptive and don't allow farmer discretion; and lack of flexibility in the detail of what has been allowed (e.g. needing to follow the specification of CS guidelines to the letter).

'... I contacted RPA to ask if I could use recycled plastic fence posts instead of softwood posts (as outlined in the CS Guidelines) but my request was refused.'

Farmer, West Midlands

Co-operation is difficult

Generally referencing higher tier / landscape-scale projects, some entries raise anticipated problems in co-operating / working together. This is primarily about problems with neighbouring land managers working together.

'I don't disagree with these proposals but getting farmers to work together on landscape scale is difficult. My neighbour is intensive, and I am extensive...we are miles apart. Our common denominator is a pint in the pub not how we farm.'

Farmer, South West

There are also concerns about how different land managers will benefit / be rewarded for their respective contributions and how schemes can incorporate different land managers joining at different times. We also see some mention of issues with co-operation with other bodies involved with the land / catchment in question (time consuming, frustrating).

Encouraging participation

Two primary factors in encouraging participation and overcoming barriers

Adequate financial incentives

This is decisively the number one answer for land managers (mentioned by around 1 in 3) reflecting the importance of their own livelihoods. It is also a focal point for advisers / consultants and also for Key Stakeholders. However, it is less widely referred to by other stakeholders (mentioned by c. 2 in 10). There are indications that this is particularly important for smaller land managers (e.g. upland farmers who may have less productive land and are more heavily reliant on funding).

Many answers give no specific thoughts on 'what makes financial incentives adequate', for example:

'It is very simple - we can either farm our land or conserve it. If we do the latter, we receive no income, so financial support is critical to the success of these changes.'

Farmer, South West

Of those that give more detail, there's a range of suggestions from the idea that payments are 'viable' through to the need for actively attractive levels of payment – going beyond simply covering income foregone – and making the scheme actively profitable to ensure participation. There is a notable voice from smaller farmers relating to the loss of BPS and the feeling that larger farms are more profitable. Hence payment in the new scheme is especially critical to smaller farms, and also tier 1 must offer adequate payments (as tier 2 and 3 may not be suitable for them).

'Particularly with the fading out of Basic Payments, more small and medium sized land managers will be looking for alternative sources of income, so will be keen to participate in ELM.' **Farmer and forester, East Midlands**

'Most farms in this area (the North York Moors National Park) are non-viable without the Basic Payment. There is also great resistance among farmers to the change from the role as food producers to one of park keepers. There will need to be the prospect of at least an equivalent income for it to be attractive.' **Land Manager, North East**

Other sub-themes include the need to sustain payments over time (particularly for tiers 2 and 3), the need for regular payments, and various suggestions for the structure of payments (e.g. bonus for additional environmental efforts / outcomes).

Making it easy / simple

This is a prominent theme amongst most stakeholders, although a little more so for farmers than for others (the general public and private companies mention it less). This is

a function partly of the barrier that the scheme may be hard to understand and too complex.

Many of the comments gathered are general mentions of making the scheme simple and easy, although others also make a range of more specific observations:

- Simplicity specifically in the applications process;
- Simplicity in how the scheme is structured;
- Clarity in how the scheme is communicated (simple language);
- Clear guidelines and requirements for ongoing processes and delivery.

The theme that farmers simply don't have the time for decoding complicated documents and processes (with technical jargon) is recurrent. There is also an emphasis that tier 1 needs to be particularly simple and accessible, as the 'entry point' for a large number of participants. In some quarters there is acknowledgement that tier 2 and 3 may need to be more complex, but ideally these too need to be simpler than has been experienced in the past.

The specific need for simple systems / IT is also raised.

Other key ways to encourage participation

Beyond the two most widely mentioned themes, there are a number of other key thoughts on encouraging participation (each highlighted by at least 1 in 10 respondents):

Advice

This was mentioned by close to 2 in 10 respondents across all groups of stakeholders, but notably more amongst non-land managers (including conservation / environmental groups who occasionally are keen to offer their own services in this area). Key Stakeholders are particularly likely to see advice playing a critical role in encouraging and enabling participation.

Frequently mentioned is the need for good, trusted, informed local advisers (with differing nuance around exactly who the adviser should be). Many want this to be a 'real person' / one-to-one rather than a more arm's length or faceless interaction.

There are also a number of specific focus areas where advice is deemed appropriate:

- Helping to identify opportunities, often specifically referencing collaborative or larger scale (higher tier) schemes;
- Adviser support for the practicalities e.g. application, ongoing processes etc;
- Advice / education in new methods and environmental techniques.

Minimising administrative burden / paperwork

Reflecting the prominence of this as a barrier, the need to avoid onerous administration is a key theme in encouraging participation across all stakeholder types.

'Bureaucracy, red tape, paperwork, we just don't have time for it. Obviously there has to be records and checks, but make them as quick and easy as possible.'

Farmer, North East

Minimising bureaucracy is mentioned at various stages of the scheme, including application processing, demonstrating compliance and claiming payments. In addition, streamlining / reducing layers of bureaucracy and duplication (of government bodies) is raised, for example:

'Having to register land parcels separately as agricultural units when our land is already registered at the Land Registry is a duplication of effort.' **Land Manager, North West**

Good payment systems

Beyond the larger theme of 'adequate financial incentives' is a clear demand for (improved) payment systems that provide reliable, regular payment that is not delayed.

'Timely payment is also essential as many land managers and owners suffered extensively through late payment of grants, leading to non-delivery of measures.' **Farmer, East of England**

'From a land manager and financier perspective, creating certainty as to both income streams and risks is crucial to enable participation.' **Environment or conservation organisation, North East**

Inclusive / options / flexibility

This theme has a number of interrelated components which are about ensuring the scheme is enabling for the widest spectrum of land managers. This may be articulated more simply i.e. making it accessible to all land managers, all farmers (and often with emphasis on smaller farmers). It may also be referencing more specific elements of the design for example:

Flexibility to pick and choose options that suit each land manager;

- Inclusive so that there are opportunities for smaller farms to be part of tier 2 and tier 3 projects;
- Flexibility to 'move up' tiers or change options part way through an agreement to suit what works best for different land managers – enabling them to respond to changing situations and learnings.

Supportive / building trust

Associated with addressing the negative experience of previous schemes, and also the desired provision of trusted advisers, the principle of building positive relationships through support and encouragement is an important underlying sentiment. We note indicative evidence that conservation charities / environmental groups are particularly sensitised to this need (c. 2 in 10 mentioning this). Key Stakeholders in particular raise the issue of

importance of building supportive relationships in order to promote uptake of ELM amongst land managers.

The idea of 'trust' is not just about the need for Defra and administrating bodies working to (re)build trust / repair damaged reputation amongst land managers; it also embraces the idea that the 'authorities' need to recognise that (most) land managers will be genuine in their positive intentions to deliver on environmental outcomes. This means:

- Positive engagement, working together, helping resolve rather than penalise;
- Avoiding disproportionate penalties.

'A fresh start will be needed with an enabling attitude, working with agreement holders more as partners and giving them the chance to rectify any issues.' **Defra arm's length body**

'As an occupation we spend most of our time alone, long days, with little and sometimes no pay for a public and press that generally seem hostile to our efforts to feed them. So try to be open, supportive and helpful.' **Farmer, North East**

Tier activities

Q9. 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?

Broadly speaking, the vast majority agree with the types of activity in each tier though most highlight some caveat or area they would like to see addressed. Only a minority (c. 1 in 7) object altogether.

Whilst the majority endorse a tier system in general, albeit with alterations as described below, a small minority oppose the tier structure altogether. Frequently this includes the notion to open up all tiers to all farmers and land managers in order to ensure the greatest impact. Others emphasise, as described above, the preference for a 'flexible menu', as some activities already cross all tiers, whilst others do not: here more clarity is expected on the rationale.

Key areas to address

Flexibility

Whilst the sentiment towards the proposed tier activities is broadly positive, a sizeable group tiers (c. 1 in 10) either express concerns about the tier system or would like to see a system where land managers can progress through tiers over time or call for flexibility across tiers, e.g. menu approach where elements from different tiers can be taken or to provide more options within tiers.

'Flexibility and freedom to choose from a list of options is key to all businesses as one size does not fit all. Constraining the farmer will simply be a barrier to involvement from day one.' **Land manager, East Midlands**

Many other responses highlight a specific area they think is missing or requires more focus across the tier options, i.e. not tier specific. This ranges from an approach that rewards outcomes rather than activities, to addressing a particular element (such as fencing, education, verges, rare breeds, pest control) as well as defining responsibilities and how land managers already employing the activities mentioned would be rewarded within the scheme.

Food production

A prominent concern amongst land managers, and farmers specifically, is the lack of recognition of food production, which many say is not fully addressed across the scheme. These concerns include the issue about whether food production should be considered separately to environmental action and also that the production of 'quality' food should be considered. Some farming stakeholders also raise questions about whether the risk of

'exporting our environmental impacts overseas' has been sufficiently considered in the development of ELM.

'Whilst the environment is important, focus on domestic production needs to be maintained as well. In our uncertain times the British public expects a secure and affordable food supply, we mustn't be reliant on foreign food when borders can now be closed for prolonged periods.' **Farmer, North East**

Inclusivity

Inclusivity is another prominent caveat, with a sizeable group demanding to make the scheme available to all land managers, including foresters in particular, and not just farmers, and to include tenant farmers, too.

'My great fear is that the "green middle" may miss out in ELM due to not being able to fit into the scheme. By that I mean the livestock farms that lie between the hills and the arable farms lower down the hill. These may not have many obvious features but are an essential link in the farming chain and have high landscape value. They must not be missed out.' **Farmer, North East**

Linked to this is the expectation to incentivise all land managers to take part, emphasising that inclusivity by design may not be enough for some land managers, but the assumption that – in order for ELM to succeed – some land managers will need an additional pull to take part in the scheme.

'Farmers who do not believe in the efficacy of low-input agriculture (most farmers) will not carry them out enthusiastically enough to achieve measurable change. There has to be a strong financial incentive to achieve biodiversity, flood management, soil-health etc. targets agreed at the outset.' **Environment or conservation organisation**

A further though less prominent concern is the need for more detail in order to come to a judgement - or finding the proposal too vague altogether.

'The broad outlines given seems to be on the right track, but more detail would be useful.' **Commons Farmer, North West**

'What people need is more detail [about] what the actual activities are, what the financial implications are and how they are tailored to specific areas of the country.' **Tenant Farmer, South West**

Generally, there is tension between the demand to make it simpler and more accessible vs. ensuring it is tailored / specific enough for each land manager (their type / size / grade of land and ecological circumstance). Whilst this isn't described as a tension within responses, these two strands of thinking are in apparent opposition and would need to be carefully addressed.

Other areas raised as missing or needing more focus

Tree-planting, woodlands and agroforestry

The theme of tree planting spans the need for greater emphasis on woodlands (e.g. from foresters) to farmers raising concerns over (mindless) tree-planting on their land, which is perceived as irreversible – and trees not falling within their expertise generally. Whilst others simply demand to make agroforestry available across all tiers. Key Stakeholders are particularly likely to call for greater inclusion of more tree planting and woodland options to be included across all tiers.

Soils / soil health

Soil health, deemed to form the basis of ecological health for some, and as such *'reduction of soil erosion should be specifically encouraged in tier 1'* **Individual, Yorkshire & the Humber**. Similarly, others demand no payments for 'dead soil'.

Need for collaboration

Some farmers specifically see the need for collaboration to enter higher tiers as a barrier, and key farming stakeholders are opposed to collaboration being compulsory at tiers 2 and 3 as it could disadvantage those farmers that are unable to for a range of reasons:

'I have been pleased to have been involved with CS schemes for a while, I agree that involving neighbours is a good thing but in my case it may not work. I would be disappointed if that barred me from the mid-tier.' **Farmer, North West**

'The structure is positive and provides good clarity. However, in practice it would be good to acknowledge how projects may move between tiers and how this would impact remuneration or recognition. For example, reintroduction of apex species can create a profound impact in shifting how an ecosystem functions and cause knock-on effects for a range of desired outcomes. On the other hand, creating a monoculture plantation may appear to fall within tier 3 woodland creation, but could achieve very little by way of outcomes.' **Individual, London**

Considering the general approval of a tier system, the following summarises tier specific feedback and areas for improvement.

Tier 1 suggestions: aim higher

The most common criticism of tier 1 is its limited options and a widely held perception that the activities described are too much like business as usual and therefore will not drive change – or even that it simply rewards for avoiding bad practice (rather than doing good). This conflicts with the sentiment that tier 1 presents an opportunity to achieve change at

scale due to the higher numbers of eligible land managers – a belief more common amongst non-land managers though also voiced by land managers.

'It is important that it can be demonstrated that tier 1 will have actual and measurable environmental outcomes and is not funded at the expense of tier 2 and tier 3 which have the potential to provide and create greater environmental benefit.'

Environment or conservation organisation, East of England

'Tier one is focused on actions that should be part of normal farm activity. It would be good to see some more ambitious targeted actions.' **Academic or researcher, North West**

Some, particularly farmers who already claim to subscribe to many activities, were critical of tier 1 for its limited options / lack of choice and would like to see the inclusion of more activity which is currently in tier 2. Often, and more broadly across stakeholders, the expectation is to include more universally (good) and holistic (whole farm/system) approaches included here i.e. any activity that one land manager can implement on their own, as distinct from higher tiers, which require collaboration:

'[Described as] Basic tier and yet as an established (20 years organic) organic lowland pasture-based farm with little or no arable now, there seemed to be few options to select which would provide income.' **Farmer, South West**

'There seems to be a fair gap between tier 1 and 2. Some of the options in tier 2 I think could be accommodated in tier 1.' **Farmer, East of England**

A popular example to include at tier 1 are hedgerows, seen as an easy way to encourage more environmental benefit delivered by the general farming community.

'Tree, shrub and/or hedge planting and maintenance ' - not sure why this is not in tier 1 as often the easiest most successful environmental benefit.' **Farmer, South East**

Tier 2 suggestions: small selection of disparate ideas, no clear suggestions

This mid-level tier is much less explicitly discussed in detail, but frequently referenced as a barrier for tier 1 land managers aiming higher - or discussed in conjunction with tier 3 as 'higher tiers'. Therefore, there is no widespread theme or activity mentioned, but general support of tier 2, appearing to be the least controversial, albeit referenced as somewhat 'vague'.

In contrast to tier 1, this tier mainly stands out for its ability to be more likely to bring the desired change, and some support including more tier 2 activities in the tier 1 options:

'This appears to begin to incentivise levels of actions that could deliver additional benefit; such as planting new woodlands, or moving from intensive to organic

pasture management, creating new public access opportunities. So, yes, it is appropriate and should be supported.' **Forester, North East**

Tier 3 suggestions: make more accessible

The landscape thinking and planning within tier 3 is generally recognised as transformational and positive. However, some ambitious and engaged land managers feel excluded and wish for options within the highest tier that acknowledge high impact environmental benefits. They would like to see options for smaller scale (land size) types of land than referenced and are concerned that a requirement for collaboration could exclude some farmers. Some provide examples of how this could be achieved or why they should be included:

'It might be worth making the point that you could have a small farm (i.e. not landscape scale) that can make a huge (i.e. tier 3 scale) difference to the biodiversity of an area. For example, wetlands, or moss land, that has been artificially drained might be so species rich that even a few hundred acres could have the impact in environmental terms of 2,000 less-rich acres. These farms shouldn't be excluded from the higher level of support just because of their size.'
Land manager, North West

'Tier 3 shouldn't just focus on peatlands and trees. Plenty of other valuable habitats e.g. grasslands and wetlands sequester carbon, especially if these habitats are created from high emission land uses e.g. arable.' **Land manager, Yorkshire & Humber**

Despite some criticism around the exclusivity of entry for land managers, tier 3 is highly regarded, particularly amongst those – often not land managers – who welcome ambitious plans towards carbon Net Zero and recognise the greatest public good in this tier with the greatest long term potential for positive change. Therefore, some (non-land managers) propose to focus funding on the highest tier for the greatest / most valuable return.

Perhaps not surprisingly, those most supportive of the higher tiers tend to suggest going even further, namely to incentivise re-wilding/a systems approach for natural regeneration within activities covered in the highest tier.

Collaboration

Q10. 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?

Principle support structures

The themes that are most frequently and consistently cited as necessary for collaboration between land managers are:

Support and facilitation for land managers to work together (including training)

The need to provide support and facilitation for land managers to enable them to work together: there is an acknowledgement that historically farmers/land managers have struggled to work together and there may be conflicting interests - and therefore help to overcome any potential problems will be required. Key Stakeholders are particularly likely to identify the importance of facilitation to promote and enable successful collaboration and also the need for this to be adequately funded e.g. via facilitation funds.

Examples were given of successful, often smaller, cluster groups who have collaborated in the past. And where facilitation is most needed might be where non-conformity by one land holder might create a 'gap' in habitat creation. Whilst facilitation is recognised to be key, this is commonly linked to questions over funding facilitators, e.g. provision of facilitators through the scheme, opportunity for land managers to volunteer – and be financially compensated for – being the facilitator.

'Commons provide the perfect opportunity to do this as you have the common land unit and then all the home farms run directly by the commoners. Landscape Scale delivery is the norm for commons. Also, many commons are contiguous with other commons so even greater scale can be coordinated. Each commoning farmer will though have different ways of operating so there needs to be coordination to maximise outcomes while allowing for flexibility. We recommend separate but linked agreements. Facilitation groups should be encouraged, and facilitator time paid for along the lines of current groups but with more flexibility and the rules should be adjusted to include one to one advice. Working together does though require governance to agree, manage and review respective responsibilities.' **Special interest group, North West**

Single point of contact to coordinate / take ownership of scheme

Linked to the above there is a call for the provision of a single point of contact or coordinator to take the lead, manage, co-ordinate farmers and land managers and provide

a long-term stable structure for collaboration. This is necessary to overcome a lack of ability/time/inclination for farmers and land managers to take on this role themselves. There is no strong consensus over where specifically the advice needs to come from. E.g. whilst some suggest bodies like Natural England (NE), others doubt their objectivity. In most cases, however, the preference is for a non-farmer with a wealth of experience in the relevant areas but an understanding of farming perspective. Less controversial examples have been, e.g. Wildlife Trust or Woodland Trust, seen as experts in their field, with an understanding of the real world implications (and not academics).

Impartial expert advisers

Linked to this is the need for independent, 'on the ground' advisers with local knowledge. The importance of trusted, local advisers with expert knowledge is especially highlighted by Key Stakeholders. Whilst the 'single-point of contact' often calls for subject experts depending on nature of the scheme, other responses also highlight the need for access to a local 'representative', who knows the area and what is appropriate for an area in question, whilst also being an expert adviser on ELM for local land managers. For some, this means providing facilitation and advice through multiple parties:

'Access to sound technical advice across multiple holdings and facilitators to bring schemes together. The two types of advisers are likely to have different skill sets but will both need a sound understanding of what the priorities of the local area need to be. For example, the need to link up marginal land to restore fragmented heathland habitat, wider catchment management to reduce flooding in flood risk areas.' **Farming representative group**

Secondary initiatives

Creating / utilising networks

The idea of creating network events/groups, farm clusters, working groups, support groups, partnerships. These suggestions include reference to building on existing farm clusters as well as learning from existing initiatives, e.g. webinars / WhatsApp groups or seminars which would draw-in local land managers interested in the same issues.

'The Cluster Groups are probably the most positive part of the current CSS scheme. This initiative needs supporting and enhancing, and in particular the funding of facilitators, who very often act as "honest brokers" between landowners/managers with different agendas to achieve a common aim.' **Farming representative group, South East**

Working with existing groups / networks

Particularly around specific issues, like maintenance of hedgerows or watercourses, some responses draw attention to working with existing networks and organisations, e.g. local

authorities, Wildlife Trusts or water companies. Others refer to adapting structures from previous schemes or involving user groups, specifically for issues involving rights of way decisions. Where administrative structures are similar to the scheme, Farming and Wildlife Advisory Groups (FWAGs) or Areas of Outstanding Natural Beauty (AONBs) are suggestions for collaboration and Countryside Stewardship facilitation groups are seen to bring farmers together. Overall, there is a strong emphasis to re-use existing structures, rather than adding layers into the scheme. Others suggest using a particular solution, e.g. UKCEH Environmental Planner Tool (E-Planner).

'Reference to local ecological network mapping where available could be helpful, as is focusing on key biodiversity areas identified locally in BAPS or other local strategies.' **Smallholder, East of England**

Payments / incentives

Payments are also a prominent suggestion to encourage collaboration – particularly through facilitation funds. This addresses a range of perceived barriers and pitfalls e.g. payments depending on full participation of landowners to encourage uptake and avoid drop-out (through peer-pressure at worst) and mutual interest to succeed (and profit). Other suggestions include more specific ideas of e.g. payment per hectare, however this is in strong contrast to the desire of land managers of smaller scale land to participate as equals, some of whom also perceive to be making greater relative sacrifices for lesser gains.

To sum up, at the very least facilitation of collaboration should be funded sufficiently and at best there needs to be a reward for working together across multiple land holdings. A financial incentive that is attractive for all parties required to participate will create further leverage for all to remain in the scheme. The consensus is that, besides successful models of cluster groups, collaboration across especially disparate or competing land manager types does not come naturally (with competing or conflicting interests and strategies, and a spectrum of wanting environmental and ecosystem change). Therefore the only solution to ensure consistent and long term collaboration is to incentivise through payments.

Involve farmers and build trust

And finally, across all suggestions, the emphasis needs to be on building trust with farmers – both between land managers and with authorities. Those who mention this caveat recognise this could 'make or break' the success of the scheme. In order to build trust between participating farmers there is a suggestion that ELM needs to offer reassurances that individual farmers will not be disadvantaged by lack of compliance or poor practice by fellow participants. FWAG is one of the frameworks mentioned to facilitate discussions and HLS agreements are referenced as examples to protect / indemnify parties involved.

'We have to trust Defra, EA, NE and at the moment we don't!' **Tenant Farmer, North East**

'By far the most effective way of achieving positive outcomes is to get the local farmers to operate as a self-motivating group - an example of this is work by Welsh Water in establishing such groups. They are a leading example of how to incentivise and encourage farmers in catchment to modify behaviour to the benefit of the water.' **Advisor or consultant, South West**

These themes are shared across stakeholders, with no notable differences in general response.

Determining local priorities

Q11. 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?

Consult local stakeholders

Overall, there is broad support for **determining local priorities at a local level**, most commonly through consulting local stakeholders, local people or specifically farmers - with a minority suggesting involving all relevant (affected) parties.

Consult generally, including local communities

Consulting local people/communities is important to many: there is a strong belief that priorities need to take account of local people's needs – commonly in opposition to central (government) decision making. There is generally an understanding that proposals and strategy may not be fully developed on a purely local level (for instance, environmental and climate action need wider ecosystem/big world thinking), but that important decisions are not imposed against the will of those affected.

'Local priorities should be decided locally by people affected by the issues; even then, if landowners don't share those objectives and priorities then it simply won't happen. This is all about consent rather than imposition.' **Land manager, South East**

Local stakeholders

Local stakeholders (examples including Local Authorities, Areas of Outstanding Natural Beauty, National Parks and local officers from national organisations such as the Environment Agency, Natural England and the Forestry Commission) are commonly trusted to bridge the gap between being local but seeing the bigger picture and wider implications. However, stakeholders are often recognised for a particular area of expertise, meaning it the individual activities and locality will determine whether consulting with the local environmental agency or representatives of local AONB sites is most appropriate.

Most of those naming local stakeholders include a range of different stakeholder types in their response, highlighting the need for discussions whereby stakeholders contribute their area of expertise to a wider consultation. These range from local government, water companies, wildlife trusts, access groups, 'relevant organisations'/NGO's and land managers/owners.

Farmers

As well as official local stakeholders, farmers are highlighted as particularly important to consult on priorities – a view held predominantly by land managers. This view reflects a combination of factors: insisting farmers know best being ‘*on the ground*’; and fear of losing agency over their land and livelihood through centralised policies and decision making, without involving them in the process.

‘Land managers will often be more easily persuaded by the Environment Agency and suitable compensation [...], than if they think the local "city jobsworths" are behind it. Better to have a national plan, locally implemented, where those who join in become local heroes.’ **Farmer, South West**

Other considerations

Issue dependent

When voicing the need to focus on a specific priority, the most common answers reflect the question wording by highlighting the need for local determination for dealing with flooding/catchment matters or public access – commonly it is either/or, rather than both.

Responses relating to flooding all address the urgency to act, but there is no single narrative. Some highlight the need for higher level national planning; others address the difference in how flooding should be addressed across the country (different types of land, different counties); others say because of its importance it shouldn’t form part of the ELM but be a separate initiative altogether.

‘Flooding is a very good example. The Somerset Levels or the Gwent Levels are very different from the peatlands or mountains. Local knowledge is key.’ **Individual, South East**

Some flooding responses however suggest that risk areas should be defined by catchment area for the appropriate management and decisions on local priorities. Responses include a variety of flood management suggestions e.g. managing flood plains by preventing development or maintaining flood plains as habitats for ecological benefit.

Consider regional, national and global priorities

A sizeable minority voice the need to consider wider priorities, highlighting demand for strategic decisions to be made on a national or global level (e.g. climate change, ecosystem based) and/or to provide an overarching framework that accommodates local priorities, but is not driven by local interest only. Other comments that favour a national/broader approach raise concerns around added bureaucracy associated with operating via e.g. local government.

'The major issues of climate change, biodiversity decline and declining water quality are so ubiquitous I question the need for any geographical targeting apart from [...] public access where local demand varies a lot, flood risk where remedial measures are geographically fixed and [...] some key species with limited natural range/habitat availability. Creating layers of geographic and thematic priorities is a beloved pastime of scheme designers and environmental bureaucrats and is counter-productive' **Forester, South West**

Use data and evidence

Using data and evidence to determine local priorities is particularly prominent amongst 'other' stakeholders, some with a particular solution or data source in mind (e.g. land mapping data, historic data, flood data, referencing studies), others more generally wishing for evidence based decision making. Across all, the sentiment is that the necessary data is already currently available but requires assessment and (risk) analysis to help set local priorities. Some also suggest making data tools available to farmers in order to help their individual priority-setting exercise or highlight the need for change.

Key Stakeholders are particularly likely to suggest building on existing data, evidence and models in order to identify local priorities and the use of National Character Areas is the most commonly cited.

'The National Character Areas (NCAs) provide a good and already established system on which to base ELM objectives. The discussion document already identifies the NCAs and the opportunity for more local participation in reviewing and determining the Statements of Opportunities. For Landscapes – AONBs, National Parks and NCAs – are a particularly good approach on which to base ELM objectives. Landscape 'units' such as these have distinct characteristics of geography, geology, ecology, land use, farming and farming challenges. We find farmers identify themselves with these landscapes more than with local government administrative boundaries of Counties or Districts.' **Special interest group**

Some farmers also share an interest in using evidence; the question being which evidence is most appropriate, as highlighted below. A general preference might be the need for an (impartial) weighing up of disparate evidence:

'This is a tricky question. Beavers provide a useful example. Farmers strongly dislike the [...] release of beavers because the beavers have and will cause a lot of damage. Fishery owners are outraged that that no serious research has been done on the effect of beavers on migratory fish. The general public likes the idea. There must be a process that insists proper research is carried out before decisions are made.' **Farmer, South West**

Democratic processes

There is a prominent view about deciding priorities through collaboration, democratic processes, partnerships such as forums, cluster groups, elected representatives and citizen assemblies - not left to bureaucrats. The need to consult all local stakeholders on big issues is rooted in the fact that stakeholders all bring their own personal or biased (or single-issue-led perspective) which in turn highlights the need for a balanced/impartial process.

'By setting up local forums with influence who can actually get things done. Forums can be unbalanced in reality with either a dominance of landowners or conservationists. Something along the lines of a National Park committee with delegates who come from the local area from all walks of land management, tenant farmers, landowners, land holding NGO's such as Woodland Trust, local authorities and government agencies relevant to the area - for example in the Somerset Levels EA would be appropriate and local IDB's. Also include user groups relevant to the area. The forums could be set up within the existing JCA's as these are largely landscape based.' **Advisor or consultant, South West**

Within all of these responses, there is also a common narrative around the threat of only achieving the lowest common denominator for environmental change. Those who voice this concern are more in favour of a process of seeking consent from local area representatives, rather than letting them decide on priorities and strategic decisions. Generally, those hoping for bigger environmental action are more reluctant to grant too great an influence to local decision makers, whereas landowners typically expect more say.

Other responses with less emphasis on priority setting (i.e. local v central), still insist on involving environmental experts, specialists, specifically outside of Defra and the farming lobby - and advisors and facilitators to help reconcile trade-offs where these are apparent. Suggestions tend to be subject matter experts, which could be scientists, such as biologists, ecologists, flood technology experts, or Historic England depending on the local area of interest.

Some responses suggest the use of a specific initiative or information source e.g. the '*LEADER fund decision making system*' (Land manager, North East). Again, there are suggestions for providing easy access to the information for land managers:

'Further details on local priorities can be found via local partnerships e.g. catchment partnerships, peat partnerships, the Northern Forest. Green/Blue infrastructure strategies can also identify priorities with regard to public access and flooding. It may be challenging for land managers to determine which public benefits they should be delivering within their land holding or landscape. Therefore, easy access to advice and guidance is critical, including from strategic partnerships.'

Environment or conservation organisation

And companies, like the water company below, offer their information to inform local priorities:

'There will be a range of existing special plans to source priorities, notably Water Framework Directive River Basin Management plans and we, as a water company, would be keen to share our data and knowledge to help determine local priorities.'

Water company

Potential tensions

A number of potential tensions can be seen across the responses, namely:

- Giving agency to locals vs. big picture, strategic thinking;
- Tailored to local area needs vs. fit for whole ecosystem/landscape;
- Respecting landowners' rights and expertise vs. achieving meaningful environmental outcomes;
- Consulting experts in their field vs. unbiased/impartial decisions

In order to balance these, respondents suggest ELM should involve processes that 'sense-check' priorities locally and seek local contributions for consideration. Additionally address landowners' concerns about the effects of environmental decision making on their land and take account of a range of available information and data sources whilst making use of experts.

Calculating payment rates

Q12. What is the best method for calculating payments rates for each tier, taking into account the need to balance delivering value for money, providing a fair payment to land managers, and maximising environmental benefit?

A significant minority of respondents either did not respond to this question (c. one in six) or explicitly said they did not feel sufficiently qualified to answer the question (c. one in twenty). Amongst those that responded the views and comments were disparate and there is no clear consensus about the best payment mechanisms for the ELM scheme; indeed, this is the area of the ELM scheme which appears to generate greatest diversity of opinion. There is acknowledgement that this is a complex, technical area which presents significant challenge in order for the scheme to achieve its objectives.

Principles for designing payment systems

However, there are some frequently mentioned themes in relation to the underlying principles about how the payment system should be designed.

A flexible approach, with options and different mechanisms across different tiers

Nearly one in ten respondents raise the issue of flexibility. This may be in terms of providing options or allowing a movement in rates to reflect the relative take up (or lack of take up) of the scheme. For some this means ensuring that the rates are not set in stone but move over time to reflect market conditions and commodity prices to ensure continued take up of the scheme. For others flexibility is about accounting for factors outside of the control of land managers e.g. weather and that there are inherent risks in farming.

For many, flexibility is about having different payment structures and mechanisms for different tiers. There is widespread support for the concept of including different methods for calculating payments at the different tiers within ELM. A diverse range of specific proposals for how payment calculations should be made were suggested.

'Tier 1 - action based funding. Farmers will be less keen to sign up if the initial tier is results based. Tier 2 - action based with a top up payment for proven results. Tier 3 - some action-based payment (otherwise potentially too high a risk to sign up). Recognise that results may take longer to achieve so don't penalise farmers / landowners for the first few years if results are slow to appear.' **Tenant Farmer, South East**

'Tier 1 activities should be obligatory and should not attract a payment. Payment would otherwise need to be set very high in order to entice the majority of farmers to engage. Tiers 2 and 3 should be paid at the net cost to the land manager, with an allowance for management time and accounting for future cash flows.'

Establishment costs should be calculated on a regional basis to allow for differences in labour costs between regions.’ **Land Manager, South East**

‘An alternative is that payments are a hybrid calculation for all three tiers reflecting the desire to maximise value for money and public good outcomes through businesses also producing goods sold at the till. This hybrid could include:

- *The value to society of the (multiple) public goods provided – i.e. goods can be stacked and all rewarded;*
- *The opportunity cost of providing the public goods;*
- *The full cost of providing the public goods using a whole farm approach taking into account labour costs and machinery for operating the business to deliver the public goods;*
- *Capital payments should be simplified to maximise investment in enhancing public benefits.*

There ought to be an attempt in all three tiers for ELMs for payment rates to reflect what is provided in the six public good baskets and to motivate delivery of what is being paid for rather than simply being a tick box. Payments should not be based on not undertaking an alternative uneconomic activity; for instance, sheep farming may well become much less profitable in a no deal departure from the EU. That should not affect the payments made for the provision of public goods.’ **Special Interest Group (Uplands), North West**

Although there is no clear consensus about the details of how the payment calculations should be made, the suggestions most frequently involve a simpler more straightforward calculation mechanism at tier 1 and more bespoke or sophisticated approaches for the higher tiers.

Sufficient to ensure it is financially viable for land managers

A theme particularly prevalent amongst land managers (mentioned by around one in six) is that payment rates must ensure that participation in ELM is financially viable. The success of the scheme is considered dependent on payment rates that offer a commercially viable option for land managers in comparison with other activities they could undertake with the land, time and capital. (Indeed, the harder, larger and riskier the change required by the ELM scheme the larger the payment is needed to account for this risk.)

Many farmers would like to see ELM replace previous BPS payments and express concerns that their own farm will not be financially viable without such payments. This links with the desire for greater emphasis to be given to food production within the scheme and a belief that UK based food producers are going to be disadvantaged compared to European counterparts. The importance of food security has also been brought into sharper relief since the COVID-19 pandemic.

‘As a farmer I am already achieving huge environmental benefits. I will not be at all if my main business as a food producer is not financially viable. The ELM won't

replace BPS, so there must be some form of other payment to stop us from being disadvantageded from our European / International producers.' **Farmer, East of England**

However, there is a small minority of respondents (less likely to be land managers) who caution against the payment rates taking too much account of the financial viability of farmers and want stronger assurances that ELM will pay for environmental outcomes and not become a farm support scheme.

'Tier 1 should not be a crutch for failing farmers.' **Academic or researcher**

'Holistic' rates that are sufficient to incentivise and encourage participation

Linked to the above is a call for any payment system to have an 'holistic' approach that accounts for all costs and financial consequences associated with delivering environmental benefits including: hours worked; manpower required; time and energy involved; machinery needed; specialist actions; all expenses; and cost of advisors. Land managers are twice as likely as other respondents to want to see a payment system that they believe truly reflects the full costs of participation.

A frequent refrain amongst respondents is that payment needs to be '*sufficient to incentivise land managers to participate*'. For some this is linked to ensuring an holistic approach. However, there is no clear consensus across respondents overall or indeed amongst land managers themselves about what 'sufficient' is: comments often relate to a land manager's own specific circumstances, land-type, farm size etc. or for lobby groups and environmental charities and conservation groups their own particular area of interest.

'Whatever payment method is chosen for ELMs it should provide an incentive to participate – those setting the rate should always ask themselves, "would a farmer sign up?"' **Environment or conservation organisation, North West**

A fair system

The fourth most frequently cited principle is ensuring that the payment system is 'fair'. This is most often discussed in the context of ensuring that economies of scale are recognised within the structure and that smaller farms are not penalised or discouraged from participating. There is a perception amongst some farmers (and others) that in both previous and current schemes large land-holdings benefit unfairly and there is a danger this could be replicated in ELM, particularly if the overall funding is focused towards the higher tiers.

In addition, the issue of ensuring that those land managers who are currently performing well in terms of their environmental credentials are not unfairly penalised; and that rewards are not solely based on improvements. In summary, reassurance is required that

payments will be made for maintaining environmental standards and not just improving them.

'Care has to be taken as to the maximum ELM grants that can be given to large estates (for example a maximum of £200,000 per holding). Also, there are large mountain estates, that may claim to be "wilding" or "going organic". However, many of these farms have never been intensified or highly managed, and so should not be receiving major funds to supposedly re-wild.' **Advisor or consultant, South East**

'In our report we suggested baseline payments of £500 per hectare for first five hectares and £20 thereafter, but we consider now that this may not be enough to ensure that take up is sufficiently high and this needs to be tested. We want to ensure that as many people as possible are incentivised and rewarded for participating in tier 1 and that this acknowledges the value of active participation both to the sector and to the UK's strategic climate and nature priorities, as well as other potential risks arising, such as the biosecurity implications of unregistered livestock ownership. For the avoidance of doubt there should be no minimum acreage for inclusion in tier one, as long as participants are prepared to meet the core obligations of data monitoring, CPD and membership of an assurance or certification scheme. This would incorporate horticulture and should boost the production of healthy fruit and vegetables, supporting other government intentions to improve health and wellbeing.' **Independent Charitable Organisation**

Simple and easy to understand

Although there is a desire for flexibility and the provision of options, there is also a call for simplicity in the design of the payment system to ensure it is easy to understand and navigate which in turn will encourage uptake. For instance, some would like to see standard tariff rates at tier 1 to provide a simple, easily understood mechanism for landowners to work with and budget for.

In addition to the actual structure of the payment rates there are also calls for the processes and procedure to be simple and straightforward. This is often in terms of minimising the associated bureaucracy, paperwork and administration – partly stemming from poor previous experience. An added benefit of a simple system is seen to be that it minimises the administrative costs of the scheme.

Other suggested payment principles

In addition to those themes identified above a smaller proportion of submissions also mentioned the following:

- **Provide certainty and stability:** this issue is more frequently raised by land managers (nearly one in ten) who want any payment system to ensure long term stability. This includes providing fixed payments for longer periods; ensuring rates

don't change frequently; ensuring rates are adjusted for inflation; that rates take account of risk factors such as weather; yearly not seasonal payments; and finally that payment is prompt.

- **Ensure payment rates are realistic:** again, more frequently mentioned by land managers who would like to see farmers and advisors or consultants that understand reality of farming involved with developing and setting the payment rates to ensure they are rooted in reality.
- **Learn lessons from previous schemes:** do not 're-invent' the wheel but build on previous schemes (CS, BPS and LEADER programme are mainly mentioned) in terms of the overall structure and approach. Also, consider the lost payments and revenue from schemes that will no longer be available and use the payment levels from previous schemes as a benchmark to set rates for ELM.

Most frequently endorsed payment calculation systems

Income foregone plus

Nearly one in five land managers and one in seven 'other' respondents would like to see the payment calculations include an element of income foregone. However, most of these want the payment rates to go beyond purely income foregone and include either costs and/or an additional financial incentive.

Land managers often use the term 'income foregone' and 'income foregone plus costs' relatively loosely to encapsulate the broad concept of ensuring that they will not lose out financially by entering the ELM scheme. They would like to see a wide range of factors included in the 'cost' element of the calculation including management time; capital assets or fixed costs; bank charges etc. There are some suggestions that income foregone calculations in previous/current schemes have not sufficiently taken account of all the associated costs. Indeed, some land managers have used the term 'income foregone' to mean that the ELM payment calculations will take account of the payments they receive via current schemes.

In addition, many also make the point that the calculations need to include an additional incentive to encourage participation or to account for the risk that land managers are taking on.

'Payments should recognise profits foregone and the cost of applying particular land management prescriptions. Possibly also the loss of opportunity cost or capital asset value where land is locked into an alternative use in the long term (e.g. woodland planting, flooding of low-lying farmland, coastal set-back). There has also got to be some degree of profit margin to make it worth entering the scheme in the first instance. If the payment simply balances the cost of the land management prescription, then only the most committed will want to participate.' **Land Manager, East of England**

'In order to deliver on these stated goals payment rates must be calculated in order to provide a fair reward for participation. This must include recognition of management time and fixed costs associated with delivering the outcomes. The income foregone calculation used in the Countryside Stewardship Scheme falls short of the true value derived by Upland and Grassland options therefore any new payment calculations must take into account a broader range of factors.' **Land Manager, Yorkshire & Humberside**

Although the inclusion of an element of income foregone plus is the most frequently endorsed method to be included as part of the payment calculations there are a minority of respondents who oppose this approach. This view is more prevalent amongst 'other' stakeholders who often oppose the principle of the approach and believe that it can disadvantage those landowners that have current good practice and will not help to achieve the desired outcomes. Key Stakeholders are less likely to support the inclusion of income foregone and raise concerns about this approach.

'The Wildlife Trusts believe that there is an inherent contradiction in using income foregone as a basis for making payments calculations in a scheme based on delivering public goods. The message that this gives – that by delivering public goods, land managers are foregoing another source of income through producing food – is wrong.' **Environment or conservation organisation, South West**

'The message that the phrase "income foregone" gives is inherently setting the scheme and the thinking behind land management down the wrong path. It is only because environmental harm is externalised that it costs more to do good. We appreciate the challenges of moving towards a new way of valuing what farmers and land managers produce for society through delivering public goods, however this does not mean that Defra should default to income foregone plus costs.' **Environment or conservation organisation, South West**

Outcomes based payments or payment by results

Around 1 in 7 respondents support an element of an outcome based reward or payment by results within the financial calculations. Support for this approach is higher amongst 'other' stakeholders and Key Stakeholders and lower amongst land managers. Land managers appear to support this mechanism because it is less prescriptive, more flexible, gives farmers greater control over their actions – whereas 'other' stakeholders are more likely to believe it is more effective at delivering improved environmental outcomes.

Although a minority express an unqualified preference for this approach to calculating payments, most respondents who endorse it also acknowledge that although in theory it might be their preferred approach, in practice it has associated difficulties. This is often in relation to measuring and assessing outcomes: for many outcomes there are no established or accepted metrics; some outcomes are more easily assessed/identified than others; measurements need to take account of seasonal changes/weather patterns; and measuring both short term and long term benefits needs to be considered. In addition, an

outcomes based payments system is thought to be more complicated to communicate and administer.

Because of these potential issues with outcomes based payment calculations they are often suggested to be used at the higher tiers or as an additional 'bonus', 'top-up', 'stretch' or 'reward' payment alongside either basic payments for management of the scheme or action based payments. There does not appear to be an appetite for solely using payment by results – particularly at tier 1.

'To pay for the (ecosystem) services provided by the asset on the farm/holding, irrespective of whether young or old. i.e. pay for the flow and actual benefit to society, rather than the asset itself. So, for hedge planted, the payment based on anticipated environmental benefits (habitat & connectivity, CO2 sequestered, landscape).' **Land owner, South West**

'Many farmers in this study were initially attracted to the idea of payment for outcomes. This was seen as a method of avoiding the prescriptive experiences under previous AES and providing a more farmer-led challenge. However, most also feared the problems with calculating payments on this basis. Many wanted their ambition and efforts to be recognised in the payment method – both past and future. The views of these farmers suggest the method for calculating payment in tiers 1 and 2 should be based on the activity undertaken plus additional payment for results (where a workable, fair and efficient evaluation is possible).' **Academic or researcher**

Paying for actions

Around one in ten respondents endorse some form of 'payment for actions' within the payment calculations – and this is equally supported across different types of respondents. Payment for actions is seen to have several benefits: simple to understand and therefore likely to maximise uptake of the scheme amongst land managers; more straightforward (and cheaper) to administer and monitor than payment by results; avoids problems of short term vs. long term outcomes; and does not penalise for factors outside of land managers' control.

There is greatest support for using a payment for actions mechanism at tier 1 in order to attract the greatest number of land managers into the ELM scheme. The certainty provided by payment for actions is considered a key element in attracting land managers who are wary of the potential risks associated with payment by results. However, even amongst supporters of payment for actions its potential limitations are recognised and there are suggestions that it should be combined with an element of payment by results – particularly at the higher tiers.

'A farmer could invest time and money, aiming to achieve one of the goals, to have nature decide otherwise. Money has been spent, but nothing achieved. From the farmers side, he had made the investment, from the public purse side, you would

be paying for nothing. Who takes the risk? We do every day, would we in general sign up for more risk - probably not.' **Farmer, North East**

'Grave concerns regarding payments by results. Assessing species, e.g. counting birds, worms etc. or measuring soil organic matter etc are fraught with difficulties, inaccuracies and some are subjective. I believe that if you supply e.g. a wild bird mix of suitable standard, that should be enough to fulfil criteria, without having to e.g. assess what bird species are using it, when the difficulties of that assessment are mired with problems of measurement.' **Farmer, East of England**

'Action based payments should be utilised rather than results based payment. Short term results (less than 5 years) are likely to be subjective/unreliable/unmeasurable. The measuring of results should be done over the long term and used only for directing actions rather than giving performance based payments.' **Advisor or consultant, Yorkshire & Humberside**

Some respondents provide detailed proposals for the types of actions or actual payment rates that should be included within the scheme, however, these are disparate and often relate to very specific actions or land types. Some types of activities, such as forestry activities, are thought to be more suitable for payment for actions due to the long time frame for benefits or results to be delivered.

A significant caveat around payment for actions is that the system needs to provide sufficient choice, flexibility and recognition of the particular land or farm types. A small minority (<5%) also raise the issue that payment for actions should only be where those actions go beyond the regulatory baseline requirements (although this is rarely raised by land managers themselves).

'On eligibility criteria, the first requirement should be that actions being proposed will build on the regulatory baseline, which needs to set out the minimum requirements for eligibility into the scheme. Payments should reflect only actions taken beyond the regulatory minimum. In this way, we might align funding from private industry to that of Government and use market-based ecosystem services to incentivise better environmental performance. It would remain a matter for Government to decide what if any capital grants were available to assist land managers meet the minimum requirements.' **Water company**

Other suggested payment methods/considerations

Payment in relation to land value: Around one in twelve respondents explicitly mention the need for the payment calculations to take account of land value, ensuring that different rates are set for different types of land. Suggestions include different payments based on different types of land (e.g. SDA land being worth less) or according to whether they include rare habitats or species or alternatively allowing an extra weighting to allow for local priorities. Some suggest calculating a single total farm 'subsidy' which is then reduced on a sliding scale depending on the value of the acreage.

'I cannot really comment on a method of calculating BUT it is essential that the rates are set at different rates for different types of land. i.e. The Uplands or LFA land needs to receive a higher rate of payment than the land on the lowlands for doing the same environmental scheme because the farmers on the poorer land need more support in order to make their business viable.' **Farmer, South West**

'Each farmer has a max pot based on a national and regional £/Ha, maybe even by land type/grade as well, a farm putting grade one land out of production is costing his business more money than putting only grade 4 in a scheme. So, points for land grades should be adjusted.' **Farmer, Yorkshire & Humberside**

Inclusion of base payments: around one in twenty explicitly support the use of base payments (i.e. a standard foundation payment for participation in ELM) or an element of base payments within the calculations. This is most likely to be thought to be suitable at tier 1.

Inclusion of payment (options) for upfront capital investment: ensure that land managers are effectively compensated e.g. machinery costs and this could also include options for refundable investments if environmental targets are not met.

Competitive tendering and reverse auctions: a small but vocal minority of respondents oppose the use of competitive tendering and reverse auctions. They are seen as overly complicated, involving burdensome paperwork, are unpredictable and lacking in transparency. There is a concern that reverse auctions can lead to a 'race to the bottom' and to 'bargain basement' environmental management. Competitive market mechanisms are most likely to be opposed at tier 1.

In addition to the payment mechanisms discussed above a minority of submissions also put forward specific suggestions for payment rates or structures which included elements such as specific £s per hectare of land. These include:

- To ensure the scheme enables multiple payments for instances where land managers are working towards multiple 'public goods';
- To use natural capital approaches, and rewards for enhancements of natural capital. This is particularly prevalent amongst Key Stakeholders;
- To have specific payments for collaboration, facilitating collaboration at the higher tiers.

Opportunities for private finance

Q13. To what extent might there be opportunities to blend public with private finance for each of the 3 tiers?

Overall sentiment

The great majority of submissions (9 in 10) expressed a sentiment. Of those that did, the majority are favourable towards blending finance:

- Over two in three on balance see positive opportunity to include private finance (including with caveats);
- Of these, many do not specify for which tiers they see opportunity and around a fifth state that blending is applicable to only the higher tiers;
- Around one in six are uncertain, or think it depends on other factors;
- Around one in six oppose the idea.

The balance of opinion is generally similar amongst the different stakeholder groups, although non-land managers are slightly more likely to support blended finance than land managers (private companies and conservation charities / environmental organisations appear particularly supportive – possibly reflecting their direct interests).

Opportunities

Carbon offsetting

By some margin, the most widely mentioned opportunity is carbon capture/offset/credits. Mentioned by close to 1 in 5, this is the biggest theme for almost all groups - although it is less readily mentioned by the general public.

Carbon offset is nearly always mentioned as a positive opportunity, although there are a range of caveats e.g. carbon markets are a complex/evolving area; how carbon capture can be measured or valued; not all land is appropriate for carbon capture or tree planting. There are varying levels of understanding of carbon-related financing and markets, with many generalised mentions along with a number of more detailed and informed discussions:

'Not sure; but if carbon trading took off the possibilities could be great.' **Land manager, North East**

'The "carbon market" is at present immature and is governed in the main by offsetting. Its real value is difficult to determine as the value varies internationally. With a move to net-zero and increasing demands on the private sector to offset carbon impacts, there may be synergies between much of what ELMs seek to deliver with growing demand, thereby pushing the value of carbon upwards. It

would be important that ELMs was not so prescriptive as to prevent responsible land managers from benefitting from any such burgeoning market. **Advisor or consultant, South West**

Carbon-related finance is generally seen as more relevant to tiers 2 and 3 than to tier 1, although some submissions do mention carbon capture as potentially part of tier 1 arrangements.

'Carbon is the obvious one in tier 2/3.' **Land manager - Farm adviser, Yorkshire and The Humber**

'Tier 1 may be more difficult as some of the items are smaller, but perhaps might be suitable for initiatives such as carbon or biodiversity credits.' **Environment or conservation organisation, North West**

Private companies

Working with or making commercial arrangements with private companies was mentioned in close to 1 in 10 submissions and Key Stakeholders are particularly likely to mention opportunities of working with water companies. Finance opportunities from water companies is widely mentioned, often related to the complementary objectives of ELM and water companies primarily with regard to water quality.

'One that comes readily to mind is water quality improvement in catchment areas where the water company extracts water, it would save the water company treatment costs if pollution was reduced so some of that could go towards helping farms to reduce their pollution output.' **Farmer, South West**

Many observe that financing from water companies is likely to work better for catchment-wide schemes, and so could be more appropriate for tier 2 and 3 projects (dependent on co-ordination between multiple landowners).

'Water companies also could offer some scheme assistance - some already do. I believe this is more likely in tier 2 and 3, but some of the actions proposed for tier 1, like soil management, could have private finance input potentially.' **Farmer, South West**

Some also highlight the challenges and complexities potentially associated with financing arrangements at a catchment level.

'For example, a water company may want to improve water quality at its reservoirs but this would depend on the collaboration of adjacent surrounding landowners. By combining a tier 3 funded project with water company funding the project takes on a new level and significance, increasing buy-in from landowners and ultimately success. Funds would have to be carefully managed to ensure fair and effective distribution. Reporting would need to be centralised in order to ensure the targets of each funder are reached.' **Land manager, South West**

Aside from water companies, financial opportunities with private companies cover a variety of scenarios (some of which draw on previous experience), such as:

- Partnership / sponsorship opportunities to benefit companies' reputations (e.g. supermarkets). These may be primarily applicable to larger scale environmental projects;
- Utilities and food sector funding projects to develop and showcase improved environmental management practices;
- Energy companies funding solar installations on mixed-use sites;
- Opportunities with developers.

Other environmental offsetting

Beyond carbon offsetting, other environmental offsetting was mentioned in c. 1 in 20 submissions – a significant minority. It is mentioned more frequently as a potential opportunity by Key Stakeholders. There's indicative evidence that conservation charities and environmental organisations are more likely than other groups to mention this. These comments highlight potential for biodiversity offsetting (often mentioning this as appropriate for developers), biodiversity net gain and environmental credits.

When discussing other environmental offsetting, some acknowledge the possibilities and challenges of double funding, often asserting the need to encourage and recognise delivery of multiple objectives and incorporate the principle of additionality into ELM.

*'There may be a particular role for a blend where there are opportunities to deliver biodiversity net gain (e.g. through development) to on farm habitat or woodland management and creation projects. This should not necessarily be seen as double funding; top up funding to achieve outcomes should be permitted and potentially opens the route for better delivery of multiple objectives. **Environment or conservation organisation, East of England***

*'Blending finance also requires careful thinking and management to avoid funding gaps or double funding and to ensure that the two sources of finance work well together, especially from the point of view of the land manager delivering the environmental outcomes. The development of ELM in coming years, through the pilot phases and beyond, will coincide with the development of private markets, including carbon, biodiversity net gain and other natural capital markets. ELM should be designed so as not to crowd out these markets and to allow them to integrate with the scheme, including through changes and adaptations to ELM if needed as private environmental markets mature'. **Special interest group, London***

Other opportunities

Finally, there were a handful of other opportunities mentioned in relatively few submissions, notably:

- **Opportunities with NGOs and charities.** Some mentions of possible contributions from charities directly involved in specific ELM projects; matched funding opportunities; and increased charitable fundraising through the public;
- **Tourism / public access opportunities** including ideas such as:
 - Charging for access to wild areas for recreational purposes, eco-tourism, wild camping etc.
 - (Collaborative) initiatives for parking areas, farm shops, cafes & accommodation
 - Paid for education projects, open farms etc.
- **Labelling or assurance schemes:** the potential to develop food assurance or labelling schemes (akin to those for organic certification) which will enable a premium to be charged for food products that can have been produced under optimum environmental conditions. (This will require education for the consumer.)

This last point was more likely to be raised by farmers and farming related stakeholders (e.g. National Federation of Young Farmers) than environmental and wildlife focused individuals or organisations.

Concerns with blending finance

While responses are generally positive about the potential for blending public and private finance, many acknowledge the practical complexities and challenges of actioning this in a fair way. Beyond mentions of practical complexities, there are also more fundamental issues and concerns with the principle of incorporating private finance, primarily:

Influencing objectives

A significant minority (c. 1 in 20) raise concerns about private funding leading to undesirable outcomes e.g. through leading the agenda in companies' favour.

'In my view, private finance should not be included as part of the ELM scheme, otherwise conflicts of interest will occur. Your scheme is hinged on farmers 'providing public good'; it follows that this should therefore be returned/paid for by the 'public purse'.' **Special interest group, North West**

Should not replace or reduce public funding

A similar proportion wish for private money to always be supplementary to public funding (not solely reliant on it).

'Private finance should also "add" to the budget available rather than replace ELMs funding as it can then be used to expand the area included in any collaborative/landscape keen or to deliver additional outcomes over and above those expected from the core ELMs offer.' **Private company, South West**

Advice

Q14. 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?

Throughout the submissions there is significant appetite for advice (it is an issue that arises across answers to many of the discussion questions) and around three in five respondents agree that advice will always be necessary.

In addition, around one in eight agree that advice is of critical importance but have reservations about concluding it is 'always needed'. For instance:

- Some are wary about making advice a compulsory requirement of the scheme particularly due to the potential cost implications for both individual land managers but also the overall costs to administering the scheme;
- Experienced/knowledgeable land managers may not always require advice;
- Advice may not be necessary for simple and straightforward activities.

Key farming stakeholders think that tier 1 activities should be accessible without the need for bespoke advice – it should be available but not mandatory or necessary – however they raise the concern that this will be dependent on clear written guidance being available.

There is widespread agreement that advice should always be available, even if it is not always taken up.

A minority of respondents (<5%) believe that that tier 1 should be sufficiently simple and straightforward that advice isn't always needed.

'Advice must be available to be accessed by all applicants, however the tier 1 options should be clear and concise to minimise the need for this advice. Advice must come from Defra and should not be open to individual interpretation. All advice must also be clear and up to date. Where tier 2&3 options are to be enacted advice must also include financial and legal factors, given the likely implications of these larger and long term projects.' **Land Manager, Yorkshire and Humberside**

Several bodies representing the interests of farmers and farming stakeholders (e.g. NFU) think that tier 1 activities should be accessible without the need for bespoke or personalised advice, but this will be dependent upon how it is designed and with the assumption that written guidance and information is available.

Only a small minority (< 5%) of respondents do not think that advice will be or should be needed – and these views are more likely to be held by farmers and land managers than 'other' respondents. The reasons given for rejecting the need for advisers include:

- The associated cost for the farmer (a belief that advisers are '*profiteering*', taking '*jobs for the boys*', with '*extortionate fees*' and not always providing neutral/objective advice) and this may disadvantage smaller farms;
- A belief that farmers often have a better understanding of how options will or will not work on an individual farm;
- Poor previous experience of working with advisers (including a wide range of both private advisers and those from NGOs such as NE, FC & FWAG);
- Associated costs to the ELM scheme that could be better spent elsewhere.

When is advice needed?

Around one in ten respondents felt that advice is required at all stages of the scheme, from the start to the end of a land manager's involvement with ELM with no detailed or specific needs over and above high-quality advice generally. Almost as many expressed the view that advice should be available to all potential applicants to the ELM scheme and this includes land managers and farmers of smaller farms.

Initial set up of ELMs scheme

There is a clear indication that advice will be important at the start of the scheme: nearly one in five respondents identify the transition to the new scheme as a key point when advice will be crucial for potential participants unfamiliar with the scheme. Land managers and farmers (who are potential applicants) are even more likely to feel this will be a critical time to access advice on how the ELM scheme will work generally and also how it applies to their individual and local circumstances.

Pre-application and application stages.

Respondents were most likely to feel that advice will be required at the early stages of the 'customer journey' i.e. at the pre-application and application stages. This includes support and advice with a range of activities: planning and scoping to determine the most suitable options for their specific land; navigating potential choices; drawing up and deciding the detail of the agreements; form filling and completion of the application process itself (particularly as previous experience suggests they will require help with over-complicated forms and a potentially bureaucratic application procedure). This early stage, consistently identified as the critical time for advice across all types of respondents, as it can make most difference to the success of the scheme.

'I think it is needed most when farmers are trying to decide priorities for land management projects. For example, is it better to start by planting a hedgerow, or by doing a slow the flow project, etc? An advisor would be needed to help make these decisions to avoid farmers becoming overwhelmed with the options.' **Land manager, West Midlands**

'It can be useful to help some farmers with scheme applications if that is not in their skill set and it can be useful to provide knowledge of successful projects within a similar area. Often, the farmer will have a better understanding of how options will or will not work on an individual farm.' **Tenant Farmer, South West**

However, there is an acknowledgement that advice should not end at this point and that it will be required during the 'implementation' phases and throughout the lifetime of the scheme. This might be in terms of technical expertise during the implementation and delivery phase; advice on practical steps to make the scheme options work in practice; or general support with ongoing administration and associated paperwork.

Complex schemes

The third area where advice is commonly thought to be needed is for large and complex schemes – which are most likely to be those in tier 2 and tier 3. This includes:

- Specialist, technical environmental knowledge of specific land types or ecologies;
- Specialists in non-environmental issues such as heritage or rights of way;
- Understanding and experience of operating at a landscape level;
- Designing schemes that require multi-party collaboration, agreements and negotiations;
- Legal and governance issues (with multi-part arrangements).

'For tier 1 advice could be group based, with local advisers, or through Farm Facilitation Groups. Tier 2 Advice should again be from local, trusted advisers, but as collaboration is an element of this tier, it will be important to get groups of farmers/land managers together. This is already happening in many parts through the Farm Facilitation Groups. At this level there would need to be input from regulatory bodies e.g. Local Council, Planning departments, River Authorities etc. Tier 3 Advice will require a greater input of Regulatory Advice. As tier 3 will have a big impact on landscape, there is a need for local input from those that may be affected by the proposed project. For example, Forest and Woodland Creation will create much different habitats to that of grassland on which trees are planted. That in turn can affect how the land is accessed. Increased numbers of visitors will have an impact on rural communities.' **Farmer, East Midlands**

'As the environmental achievements demanded by tier 2 will require a greater input from various professional wildlife and landscape advisors it will be necessary that the introductions will need to be made by an ELM tier 2 representative. It is also important that these representatives must not only interact with the land manager on initiation of the scheme but throughout the duration to oversee and adjust time critical events which will inevitably need alteration as the scheme progresses. Tier 3 will require specialist advisors to administer the large landscape projects.' **Land manager, Yorkshire and Humberside**

Other times advice will be necessary

In addition to the three key areas above, the following were also identified (albeit by fewer respondents) as important considerations for designing the advice element of the ELM scheme:

- Ensuring advice is easily available and accessible for those who are new to such schemes or who are less experienced and less knowledgeable about applying for and delivery of environmental schemes;
- Linked to the above, advice which is specifically aimed at explaining the scheme and encouraging uptake;
- Help and advice to ensure coordination between landowners/partnerships/networking;
- Advice and support with the monitoring and self-assessment processes - a higher proportion (one in ten) land managers mention advice with this aspect of the scheme. There is a call for a more supportive and collaborative approach to monitoring – with the use of advisers rather than inspectors to aid the process, again particularly from land managers.

'I would suggest advice is needed pre-application re. developing a farm system that works hand in hand with the environmental priorities. However, this should be the beginning not the end of advice, support with delivery through monitoring and evaluation rather than inspection (but penalties where this does not work) to engender partnership between government and land manager. There is much more scope to merge advice, monitoring, evaluation and ultimately regulation into one if the system is working on the basis of trust and co-operation.' **Land manager, Yorkshire & Humberside**

What constitutes good advice?

The three most important aspects identified as crucial to good advice were:

Experienced, qualified, accredited advisors

There is a strong call for advisors who are considered: experienced, knowledgeable, trained, high calibre, credible and trusted. Key Stakeholders are particularly likely to stress the importance of experienced and potentially audited advisors. However, there is little consensus about who or which organisations live up to these expectations. Some respondents would like to see environmental charities/organisations (e.g. Wildlife trusts, RSPB); others recommend *'agriculturalists not environmentalists'* or agronomists; whereas others suggest farmer led organisations such as FWAG; and for others NGOs (e.g. FC, NE). There is also a call for developing a specific ELM accreditation process for advisors to ensure a consistency.

'The government should set standards and make sure advisors are accredited and subject to CPD requirements. Trusted advisors with the appropriate technical skill

and local experience are crucial to ensure consistent and effective delivery of all three tiers. Where third party organisations deliver tier 1 advice existing commercial relationships mean they often lack the neutrality and objectivity needed to ensure that public and private (farmer/landowner) interests are appropriately balanced. It is strongly recommended that the remit and resources of the existing network of EA field officers and CSF advisors be expanded to provide a consistent core national advice service - available to all farmers regardless of location. Third party organizations would be better served supporting tier 2 and 3 initiatives where the needs, understanding and specialist experience can be most effectively used.'

Water Company

Tailored and local

In order for advice to be relevant and meaningful there is a need for it to be tailored to individual needs and circumstances of individual farms. In particular, respondents raise the need for local advisers who have in-depth knowledge of the area and the farming systems and habitats: they want an advisor that has experience of what does and doesn't work on local or similar farms.

Low cost

Around one in ten respondents identify the potential problem of the cost of advice with a call for ensuring that it is either low cost or indeed free (the latter mentioned by c.5%). This is considered particularly important in the early days of the scheme and during the application stages. There is a concern that the cost of advice could be a significant barrier to uptake of ELMs, particularly for smaller or less experienced farmers unfairly disadvantaged in comparison to larger businesses that can afford advice. It will be important that any advice does not cost more than the income that participating in the scheme can secure for land managers.

N.B. There was very little spontaneous mention of grants for advice.

Other important constituents of good advice

In addition to the three areas above the following were also identified as important:

- **A dedicated point of contact** or team of advisors that gets to know the individual land manager and their land providing continuity over the lifetime of the scheme and enabling development of a trusted relationship;
- **Personal, face to face contact**, site visits or phone calls (more frequently mentioned than online channels such as via YouTube, podcasts, webinars) and particularly appreciated by land managers and farmers;
- **Ensuring high quality advice:** practical, clear advice, up to date, consistent;
- **Independent**, impartial and neutral. Some have concerns about advisers from private companies due to concerns with the private advice/market system lacking

impartiality. However, for others independence means organisations that are not connected to Defra;

- **Respecting the knowledge and experience of farmers:** ensure land managers' expertise is valued and there is mutual respect.

Self-assessment

Q15. We do not want the monitoring of ELM agreements to feel burdensome to land managers, but we will need some information that shows what's being done in fulfilling the ELM agreement. This would build on any remote sensing, satellite imagery and site visits we deploy. How might self-assessment work? What methods or tools, for example photographs, might be used to enable an agreement holder to be able to demonstrate that they're doing what they signed up to do?

Support for self-assessment

The vast majority of those that expressed an opinion regarding self-assessment are in support of it. Compared to other stakeholders, land managers are most likely to strongly support self-assessment and wholeheartedly endorse the principle. Other stakeholders are more likely to put provisos or caveats on their support.

Minority opposed to self-assessment

Only a minority (c. 1 in 20) object to self-assessment altogether or have very strong reservations (slightly higher amongst non-land managers). The reasons for this objection are as follows:

- A danger that self-assessment can be open to abuse or fraud and cynicism about whether farmers can be trusted to complete self-assessment accurately or reliably due to their financial self-interest;
- Self-assessment is burdensome, providing extra work for landowners (with negative impact on mental health and wellbeing) and the use of existing monitoring systems such as the Red Tractor, Farm Assurance or Organic Certification should be used;
- Self-assessment tools such as photos, sensing or satellites are unreliable or unable to provide meaningful measurement of outcomes and a greater emphasis should be given to 'feet on the ground' methods using inspectors, advisers, audits or surveys.

'More frequent one-to-one site visits are essential. If a farmer builds up a good relationship with the adviser then they are more likely to succeed in delivering good outcomes. Self-assessment smacks of lots of form filling and learning new skills. This is likely to put many farmers off, particularly the smaller farmers. My experience of using photographs as evidence is not good. Mostly the photos are poor quality and not representative. They can also be easily manipulated. Not everyone has a good enough camera or phone, then there's the problem of uploading them and labelling them. Hugely time consuming and not very accurate. It's a no to photos from me!' **Advisor or consultant, South West**

'I think self-assessment is fraught with difficulty and presents too many challenges. Yes, submitting digital information online etc. is fine for physical modifications where

delivery is fairly black and white, but where the outcome is more subjective, variable, and not entirely within the control of the land manager, the manager should not be at risk of being penalised for failure to deliver on something over which he does not have full control. The return of a particular endangered species, for example, might be an indicator of success but payment cannot be assessed against those types of result and they are impossible to properly measure. A large degree of trust will be required.' **Land manager, East Midlands**

Methods and tools for self-assessment

Photographs (& video)

By far the most widely suggested tool for self-assessment across all stakeholder types (mentioned by over one-third of respondents) is the use of photos and to a lesser extent, videos. If the system is designed appropriately, photos are thought to be a simple, straightforward, low burden mechanism for landowners to complete and preferable to existing and historic poor experience with burdensome, time consuming paperwork and/or punitive RPA inspections. For many, photo images are seen as an objective and 'fool-proof' measure. There are also suggestions that photos should play a greater role in self-assessment at tier 1 than the higher tiers.

Many respondents highlight the need for a simple process and procedure, accessible to all farmers and landowners to ensure that uploading and using photo evidence before, during and after work is simple and user friendly. A minority of respondents mention the potential use of video for additional easy to collect evidence: the benefits are in providing more detailed evidence and also allowing for a 'talk over' by the land manager to describe and highlight specific aspects.

'A SIMPLE website page personalised to each SBI, that could allow photographs taken with a mobile phone to be uploaded to show progress, automatic resizing of pictures and simple design to allow farmers to do it, but not be frightened of the complexity of the process. Again, small farmers need to manage their time. Make sure that it stays the same for a period of time without being subject to multiple updates and changes, so that farmers get to be comfortable with its use.' **Farmer, South West**

Amongst those that endorse the use of photo evidence there is a widespread suggestion that using date, time and location stamped photos (with a variety of different suggestions for how location tagging could be done e.g. GPS location, GIS mapping, co-ordinate tagged, or validated using EXIF data) would increase the reliability and validity of photographic evidence. There are also suggestions that a specific ELM app should be developed to streamline the collection of appropriately tagged photo evidence.

IT based tools & methods

There is a significant call for the use of various technology and IT based tools and methods to support self-assessment, most frequently:

- Tagging photo evidence (as outlined above);
- Development of an ELM App (as outlined above);
- Development of dedicated ELM websites/portal to upload evidence;
- Use of existing Apps or mapping products e.g. LandApp, Nature Bid, Omnia, BASC's Green Shoot Mapping website, UKCEH App the Environmental Surveyor;
- Use of drone footage (suggested by c. 1 in 20);
- Use of satellite imagery / remote sensing (suggested by c. 1 in 20);
- Use of remote sensing;
- Remote assessments or inspections via video calls e.g. WhatsApp (which has been successful for some during COVID-19 pandemic);
- Incorporating self-assessment within existing farm software (e.g, Farmplan, Muddy Boots, Gatekeeper);

Despite the endorsement of the use of technology (and a feeling – especially amongst some Key Stakeholders - that the response during the COVID-19 pandemic has demonstrated that more can be done online/remotely) there is also a call for IT systems that are simple and easy to use. Respondents raise the issue that a minority of farmers may not be able to access these solutions due to: low IT literacy levels; lack of access to smart phones/cameras phones; poor mobile signal; or poor internet connections - all of which need to be considered in the design of the self-assessment systems. Any new systems would need to get 'buy-in' from farmers.

Satellite imagery and remote sensing

The use of satellite imagery and remote sensing appears to divide opinion, although on balance there is greater support than opposition. Those supporting the use of satellite imagery and remote sensing believe it to be an objective, reliable and efficient monitoring tool. Proponents appear more aware of the capabilities and recent advances in the technology, however, it should also be noted that they are more likely to be private companies, consultants and environmental charities/conservation groups (some of whom may have a vested interest in the use of such technology) rather than land managers.

'We strongly advocate the use of satellite remote sensing as a method for automating project monitoring and assessments, which is quick, cost-effective, and transparent. Satellite imagery is especially pertinent to results-based monitoring.'

Private company, London

A small minority of respondents express concern about the use of satellite imagery and to a lesser extent the use of drones. These concerns primarily centre around a lack of accuracy and potential inconsistencies - this is often based on previous experience, for instance the way in which images can be distorted by shadows, uneven ground and

overhanging greenery. There is also a perception that the use of such technology is 'big brother' which erodes trust and relationships.

'Satellite imagery for BPS has produced nonsensical errors, for example young trees being classified as grassland and strips, the verges between hedges and tracks also classified as grassland.' **Farmer, West Midlands**

Existing operational/administrative information

Around one in ten respondents advocate the use of some form of operational or administrative data that land managers will already be collecting as part of their business as usual practices or to meet other regulatory or scheme requirements. This includes a range of sources such as: the submission of annual reports; farm accounts, invoicing records or delivery notes; field records, nutrient management plans, pesticide use or spray records; and data captured from farm machinery (e.g. relevant tractor hours and machinery used).

Land Management Plans were only explicitly mentioned by a very small minority (<1% of respondents):

'At holding level, farmers will most likely be producing land management plans (LMP) which we propose should all include a specific focus on IPM. The LMP should require regular monitoring of progress, including achieved reductions in pesticide use both in terms of area treated and toxicity. The LMP also needs to incorporate ways to monitor IPM impacts on public good outcomes as well as the impacts on farm net income over time.' **Lobby Group, South East**

Measurements of natural features

Although the majority endorse the concept of self-assessment, around one in ten respondents would like to see it supported and augmented through some form of objective measurement of natural features/outcomes. This could be in the form of sample surveys, flora and fauna species counts, soil health and soil organic matter assessments (soil DNA mapping). The importance of an initial survey being conducted at the start of an agreement in order to provide baseline measurement against which to monitor future change is highlighted.

This approach is more likely to be recommended by stakeholders such as lobby groups, environmental organisations and conservation group and academics/researchers than Land Managers. Indeed, many of these stakeholders also suggest the use of staff and volunteers from environmental/conservation groups as a resource to undertake the necessary survey work, along with the potential for 'Citizen Science' type projects.

'It would be appropriate to use soil health assessments to monitor how well the soil performs all its functions now and how those functions are being improved for future use. There are several rigorous soil assessment tools available and these have

been specifically designed to be used with ease by land managers in the field e.g. Soilmentor (<https://soils.vidacycle.com/>).’ **Specific interest group, South East**

Self-assessment supported by a ‘human element’

Despite the support for self-assessment, one in seven respondents across all stakeholder types believe that this should be supported and supplemented with a ‘human element’. This view is particularly prevalent amongst Key Stakeholders. This encompasses a range of suggestions:

- Many of those that support the use of satellite imagery and remote sensing suggest that an element of ‘ground truthing’ and on the ground monitoring is also required to support and give confidence in these techniques, ensuring they are properly interpreted and interrogated;
- Some would like to see advisers guiding and assisting land managers through the self-assessment process;
- Others suggest self-assessment supported by ‘spot checks’, ‘audits’ or ‘inspections’ – which could also be carried out on a risk based system.

‘Failure to provide a photo should increase the likelihood of audit, rather than attracting a penalty. Farmers should not be penalised for good-faith errors in their application or monitoring.’ **Land Manager, South East**

‘More widely we strongly recommend the approach set out in Dame Glenys Stacey’s report on farm regulation be adopted. This proposed an approach that recognises farmers’ individual circumstances, with local advisers visiting to discuss issues rather than turning up to impose an automatic sanction. As the Defra press release announcing the report said, “the regulator should work alongside farmers to “do with” rather than to “do to” in order to ensure high standards”.’ **Defra Arm’s Length body, West Midlands**

There is an overarching message that whatever self-assessment methods and tools are used for monitoring ELMs they should be user friendly, simple for land managers to understand and complete and be designed to minimise the burden and time spent by land managers. This issue is particularly important to land managers (although also raised by other stakeholders) and in relation to tier 1 activities that will affect a larger number of land owners and also smaller farmers for whom the burden of self-assessment is perceived to be greater.

National Pilot

Q16. 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?

Overall sentiment

While there is overwhelming agreement that piloting is valuable and should happen, only around half of the responses expressed whether they agreed specifically with the proposed approach. This means we cannot definitively say how widespread support is for the pilot proposals. However, amongst those who did give a view, we see:

- Around half agree unreservedly with the pilot approach;
- Over one third support the proposed approach – but with caveats;
- c. 1 in 7 don't support the proposed approach (or think there should be no pilot at all).

This positive balance of opinion is generally similar across all the different stakeholder groups however we note that land managers are slightly more likely to give an opinion.

Opposition to the pilot

While a relatively small proportion do not support the pilot approach, amongst these responses there are a number of reasons for opposition:

Time: Some believe that the pilot will not allow enough time for comprehensive learning to be gathered and fed back (particularly for tier 3 projects). Equally there is concern that the pilot will delay roll out of the main scheme for too long (both because of the pressing need to address environmental issues, and because of the phasing out of BPS).

“My concern has always been the long time being taken to get to scheme roll-out. The fact that we are still almost 5 years away from the start of the scheme (by which time BPS payments will possibly have shrunk considerably) is potentially very worrying... ELM should and I am sure will evolve over time, and the sooner we start on the journey the better.” **Farmer, East Midlands**

Not inclusive/representative: There are a host of comments that the pilot needs to include smaller organisations/farms, make provision for places with specific requirements, and take account of a full range of interest groups. There are also suspicions that the pilot may be removed from the realities of the majority of farmers.

‘I can't see that the pilots cover enough of the different types of agricultural production systems that there are and enough of the regions to be a true evaluation and test.’ **Farmer, East of England**

'No. Your pilot consultees are drawn from a very narrow environmental lobby and unlikely to ever be accepted by the majority of land managers as representative.'

Tenant Farmer, South West

Learn from previous experience:

'Why are you trying to reinvent the wheel? Have you not learnt anything from the existing schemes? There is no need for a National Pilot' **Land Manager, East of England**

Need more detail to judge: the current descriptions were seen as too vague.

Key elements to test

Some respondents (around 1 in 20) simply believe that the whole approach should be piloted, however many also explore specific elements. The most commonly identified are discussed below:

Payment and reward

Reflecting one of the recurrent primary themes throughout the responses, this is the most widespread element stakeholders want to see piloted. The need to pilot payments and incentives is mentioned by around 1 in 10 submissions, across all types of stakeholders (particularly advisers). The views expressed have different levels of detail, and pick up on three core sub-themes:

- **Payment methods** – there are a host of issues that stakeholders are looking for the pilot to resolve around the (new) methods / mechanics of determining payment;
- **Payment amounts:** are rates sufficient both to encourage uptake by farmers and landowners, and will they prove financially viable over the coming years and in different situations?;
- **Payment administration** – testing the reliability, regularity and timeliness of payments.

'...mechanisms for price setting, especially market-based approaches' **Private company, London**

'How we move beyond the income foregone payment calculation model to a more benefits-led model; how certainty and risk can be managed as part of a payments for outcomes approach which should be scaled-up significantly; how land management plans can integrate public and private funding and the necessary governance and delivery structures to help achieve that.' **Environment or conservation organisation, South East**

'The pilot is fine in principle, however the transition period between direct payments disappearing and the ability to enter ELMs, will be crucial. Farms may suddenly find

themselves down 50% of their income and 100% of their profit, especially those in the uplands' **Farmer, North East**

'PAYMENT, ensure it is prompt, and ideally paid quarterly or partial payments.' **Tenant Farmer, South West**

Outcomes and effectiveness

The fundamental issue of whether the scheme can achieve what it sets out to do is an element that c. 1 in 10 wish to see tested in the pilot. This call for proof of concept is evident amongst all stakeholder groups.

'Will what is being asked for bring about any real effective change or improvement and how will this be verified, audited and will it be value for money?' **Member of Public, East of England**

'Testing the application of interventions and the expected results are in line with what is needed from the scheme. If you want to blend ELM schemes with private investment then you need to be able to describe and perhaps quantify the (additional) benefits.' **Defra arm's length body, South East**

Relating to this, some highlight that the piloting must demonstrate that the scheme can and will deliver in a wider real-world context, (including realistic resourcing, via collaborative agreements, within the wider regulatory context). A further cautionary note is that the trials must not be self-serving: feedback should be gathered on what does not work, and acted upon, and alternatives should also be piloted. Some also mention the (potentially long) timeframes needed for results to be evidenced.

Monitoring

Around 1 in 20 mention monitoring as an element to include in the pilot. It is emphasised slightly more by advisers and conservation bodies/environmental groups than by land managers (particularly farmers). Often regarded as essential by those who mention it, this theme is multi-faceted, including comments on:

- Testing (new) methods for monitoring compliance in the pilot, including self-assessment and IT systems for reporting;

'Monitoring would be a key element to test - how much is needed, the time taken for this, administrative burden, and how much it actually relates to the outcomes it is measuring.' **Academic or researcher, South East**

- Testing how to extend the scope of monitoring to measure success in a broader sense e.g. wider environmental benefits, social value;
- Monitoring of the pilot itself. This can be seen as fundamental if the exercise is to be worthwhile;
- The need to establish benchmarks and baselines for monitoring (through piloting).

There is recognition that piloting monitoring systems may be challenging as measurement of true environmental benefit can be complex and may take many years.

'Methods of monitoring, reporting & evaluation (bearing in mind that the pilot will be considerably shorter than the actual scheme).' **Lobby group, Yorkshire and The Humber**

Ease of application and submission

Mentioned by around 1 in 20, this element is of similar prominence across the full range of stakeholders. Testing the application and submission processes for a **wide range of applicants** is seen as key

'Please test the options selection and application process on a variety of farmers from different sectors and different locations to ensure there is opportunity for all to participate.' **Land Manager, Yorkshire and The Humber**

There are also mentions that application and submission processes need be tested to ensure they are simple, understandable, easy to use and not take too long. These factors are seen as necessities if ELM is to gain traction.

'The ease with which projects can be proposed, signed off and initiated. Test how this differs across the different tiers. More projects will only be undertaken if it is deemed to be an easy process to get involved with.' **Land manager, South East**

Other areas to test

There are a number of other elements mentioned by fewer than 1 in 20 respondents, which we also briefly describe here:

Support and guidance

Sometimes mentioned in conjunction with testing application and submission stages, this is an aspect of piloting that advisers and conservation charities/environmental bodies are a little more likely to mention (and can be keen to be involved with). A number of different elements of support and guidance were mentioned with regard to piloting:

- Appraising both availability and quality of advice;
- Testing consistency of advice from different agencies, and evaluating co-operation over advice provision;
- There is also mention that advisers should play an active part in conducting the pilot exercise;

Promotion and participation

Including provision for promotion and engagement as part of the pilot, including communicating the scheme to a wide variety of land managers, and engaging with them on a continuing basis. Using the pilot to feed back on the best ways of engaging with land managers, encouraging participation, and understanding the barriers to overcome.

Customer experience

Broad comments emphasising that the 'on the ground' experience (including administration and systems) needs to be genuinely reflected in the pilot – through inviting feedback from all and listening.

Other specific test areas

There were a diverse range of comments relating to specific aspects that certain stakeholders wanted to include in the pilot. Illustrative examples include agro-ecological land management, invasive species control, peri urban land, agrobiodiversity, the historic environment, public paths, bridleways and access, common lands and uplands.

Principles of the pilot

Beyond answering the question of what specific elements of ELM should be tested in the pilot, much of the body of response also talked about broader principles around how the pilot ought to work. The major 'bigger picture' themes were all underpinned by 'inclusivity':

Ensuring the pilot is inclusive and representative

This is mentioned by a significant proportion of respondents (Around 1 in 10), and particularly evident amongst conservation charities/environmental bodies. This theme encompasses the perceived need for the pilot to demonstrate the scheme works and is acceptable for a wide range of landowners, land types, sizes of plots, regions, enterprise types, farm types & scales. Also mentioned is the need to involve a full spectrum of stakeholders in the pilot process and development of the scheme (including experts through to 'on the ground' participants).

Including farmers in the pilot (to make sure the scheme is workable 'on the ground')

In addition to calls for inclusivity, there is a notable volume of comments specifically calling for the involvement of farmers – and especially smaller farmers – in the pilot. Perhaps unsurprisingly, this was voiced more by farmers than non-land managers reflecting concerns that the pilot could be steered by environmental groups and 'experts' more than farmers 'on the ground'. Farmers' local knowledge and their key role in delivering the scheme means they feel they must play a central role in piloting.

'It's important that throughout the Pilot, Defra directly interacts and works with farmers to learn and implement what farmers want to trial, informed by their knowledge and experience. Farmers will be particularly aware of local needs and priorities, and what public goods their land can deliver... Farmers being involved in the Pilot from the outset will also increase the capacity for peer-to-peer learning and knowledge sharing into the future.' **Farming representative group**

There is also some mention that the pilot should not just use farmers who are keen early adopters but should also encourage those who are less likely to volunteer for such schemes. As for the main scheme, the pilot should be as accessible as possible.

Including / consulting with independent specialists

Lastly there is a significant number of mentions of the need to include independent specialists in the pilot in a consultancy and or supervisory capacity to broaden the input of skills and views (advocated particularly by private companies and conservation charities/environmental bodies). FWAG, LEAF, Local Government Associations and other independent advisers are mentioned, amongst others.

'It is also important that independent specialists are used, such as existing experienced and respected farm environmental advisors, to work alongside the Defra group representatives. Organisations such as the Farm and Wildlife Advisory Group should be included if we are to bring scale, ambition and connectivity to existing efforts.' **Special interest group, South West**

Focus on specific policy areas

This chapter highlights themes relating to 7 specific policy areas. These have been drawn from analysis of submissions from: respondents who self-identify as having an interest in the policy area (e.g. state they are a tenant farmer or commoner); respondents who repeatedly mentioned the policy area in question across several questions; and key stakeholder submissions. It highlights new themes relating specifically to the policy area or where there was very strong endorsement of issues discussed in the previous chapters.

Organic farming

Submissions focusing on organic farming come primarily from land managers including organic farmers and also a smaller number of key stakeholders including the Soil Association, English Organic Forum, Organic Farmers and Growers CIC and Sustain.

Greater ambition

Although the principles and objectives of ELM are supported there are significant calls for the scheme to be more ambitious in terms of its focus on environmental outcomes and sustainable farming systems.

Ensure organic farming is financially viable

There is a call for greater acknowledgement and focus specifically on organic farming within ELM. In particular, the payment mechanism should consider how it can make organic farming a financially viable option. Organic farmers are under financial pressures from intensive farming and imports from countries (including within the EU) with subsidies and therefore entry into ELMs needs to ensure organic farmers are not at financial disadvantage to compete.

The transition period to ELM is of particular concern as BPS will be reduced before other schemes and sources of income are available. The organic sector request that payments rate must not be purely based on 'income foregone' and there are concerns that this is mentioned in the PDD. In terms of the transition period, there is a call for early and clear communication to land managers informing them that there will be no replacement of BPS; land managers need clarity on what will be supported through ELM in time to enable them to re-think their farm management practices to secure entry into ELM.

'Previous schemes such as OELS and mid-tier have included payments for organic management and for conversion to organic. There is no mention of this in the ELMs document. We need to know what your intentions are in this respect.' **Organic Farmer, South West**

'From my own past experience, my original reasons for joining HLS in 2007 was for financial return and business logic. But then when you see the increased

biodiversity, the earthworms in the soil, the insects, the flowers and the birds, the enthusiasm builds, and you get hooked. Now that our HLS scheme is about to end, financially I would be better off ploughing out all my wildflower meadows whilst it is still permitted as CS does not value them. But it would go against everything I have worked towards so they will stay. Participation in ELM has to be a no brainer.'

Organic Farmer, South West

There is concern that the current proposals mean land managers in receipt of Countryside Stewardship funding cannot participate in the National Pilot (due to double funding rules) and that land managers entering into organic conversion will have a difficult decision about when to convert in order to be eligible. Many think it is important that organic farmers are included in the pilot.

More options for organic farming within ELM

Organic farmers would like further details about the activities within each tier and reassurances that there will be organic options at all tiers, with payment rates for both conversion and maintenance. It is generally thought that the scheme should be universal with opportunities for all and that the options at tier 1 should be expanded. The organic sector would like greater reassurances about those farmers who already have strong environmental credentials; there is concern that as some will 'lose out at tier 3' because they have already adapted their business to organic farming. In addition, they would like confirmation that land managers can take part in multiple activities across different tiers e.g. organic in tier 1 and wildflower meadow in tier 2.

Regulatory compliance

There is a call for a robust and properly enforced regulatory regime with a greater emphasis on regulatory compliance; and a clear distinction made between those farming practices that are required in order to be compliant within existing regulations and those that practices that are eligible for financial support. Indeed, some would like to see harsher enforcement.

'The Stick: the regulation should be stricter and enable farmers to be fined for harmful activities such as leaving the soil bare in the late autumn/winter, which causes nutrient wash off/soil erosion/flooding e.g. after maize harvest.' **Organic Farmer, South West**

Whole farming systems approach

There is support amongst both land managers and stakeholder organisations for a whole farming systems approach and calls for this to be referenced at tier 1. There are calls for an 'Organic Package' within ELM to continue the existing Countryside Stewardship support for organic conversion.

'The sole focus on payment for individual land management activities i.e. technical options is entirely inadequate. There is a critically important need to recognise the

role of farming systems (not just individual activities) in maximising the public good delivery. The "whole is greater than the sum of the parts." Landowner

Collaboration

Organic land managers identify potential problems with collaboration, particularly between different types farmers (e.g. intensive vs. extensive, established vs. 'incomer') and therefore the need for facilitation. The CCS facilitation groups are seen to provide a good model for this. Organic land managers appear to be more open than land managers generally to having engagement and involvement with a range of environmental/conservation groups, and wildlife organisations e.g. RSPB, FWAG consultants, local wildlife trusts.

England vs. UK

Key organic stakeholders raise the issue that ELM is an English scheme: what will happen in the devolved nations and how this will impact organic land managers since organic regulation is at a UK level and many organic farms cross borders?

Assurance schemes and certification

Both organic farmers and stakeholders raise the question of how organic assurance and certification schemes will be integrated into ELM and identify this as an omission. Some suggest that organic assurance and certification could be used as a good model for self-assessment for ELM. Others think that ELM should acknowledge the potential of assurance schemes as an alternative mechanism for financing environmental outcomes via charging a market premium.

'Assurance schemes may be the best model to achieve this, for example organic and other certifications can see high environmental standards paid for through a combination of a market premium and government funding for the public goods delivered.' **Farming representative group**

Other specific areas for inclusion and greater emphasis

Specific areas that those involved with organic farming would like to see included, or have greater prominence in the ELM scheme include:

- Soil quality;
- Reducing use of fertilisers and pesticides;
- Opportunities for agritourism;
- Carbon sequestration;
- Funding for educating public/farmers;
- Land Management Plans as the foundation of contracts with Defra.

Tenant farmers

Submissions focusing on tenant farmers come primarily from tenant farmers themselves; groups of tenant farmers; and smaller organisations groups working with tenant farmers. This section also draws on responses from key stakeholder organisations, including the Tenant Farmers Association and NFU.

Access to ELM

Tenant farmers and organisations want to see options included within ELM for **all** farmers to be able to participate and that the design particularly considers whether all the options are suitable for tenant farmers. There is a call amongst a minority to ensure only active farmers can access the new scheme and that “dual use” is banned.

‘It will be important to ensure that any schemes developed are relevant not only to owner occupiers but to tenant farmers and others who do not own the land they use for farming purposes.’ **Farming representative group**

Some would like to see requirements for all landlords to allow tenants to participate in ELMs – particularly tier 2 and tier 3 projects – in order to ensure all tenants are able to fairly participate in the scheme. Flexibility and allowances for tenants on short term agreements or with only a short term remaining, will be required to enable tenant farmers to engage with ELM, again especially at tier 2 and 3.

‘All landlords must allow tenants to participate in Tier 2 and 3 projects, including woodland planting (unless ELMs will widen scope so that those of us on permanent chalk grassland - where scrub management is necessary, have more options to participate in that tier).’ **Tenant Farmer, South West**

Payment

Ensuring the structure and processes of ELM results in payment going to the tenant farmers and not the landlord is a primary concern amongst tenant farmers. They want reassurances about who the ‘subsidy’ will go to and an appreciation that tenants and landowners may have different priorities and motivations. There are concerns about the use of income foregone as a payment mechanism for tier 1 which it is thought will not adequately incentivise or reward farmers, including tenant farmers.

‘A successful scheme will need to address the imbalance between landowners and tenants. Tenant farmers should reap the full reward for their contributions to nature and wildlife, and not have this creamed off by do-nothing landlords.’ **Advisor or consultant**

There is concern about the period of transition away from BPS and whether the removal of direct support will make businesses unprofitable and therefore risk the environmental good

practice that has already been put in place. There are calls to ensure ELM supports existing good practice in addition to encouraging new participants.

Consider landowner/tenant relationship and legal complexities

There is a call for ELM to acknowledge and take greater account of the complexities of the legal structures of tenant farming which can make decision making and arranging agreements difficult and potentially act as a barrier to participation with ELM. In addition, ELM needs to consider how to encourage tenant and landowners working together and how it will overcome instances where landlords and tenants disagree.

There are also calls for a change in tenant legislation to address these problems.

'In common with much of the country, the High Weald AONB has many models of land holding and farming management and where the owner is not also managing the land, it is often farmed using a range of formal and informal arrangements. Arrangements involving more than one person can complicate decision-making and may discourage participation in ELM. Tenants won't necessarily have the same interest in investing in the long-term future of the holdings as those who own them outright and even when the owner and tenant want the same outcome, agreeing the land management and apportioning the associated costs and benefits remains complex. To address this and to allow the range of land management arrangements to play their part, we would recommend that Defra consults the Tenant Farmers Association and the Fresh Start Land Enterprise Centre.' **Special interest group**

'The demise of AHA tenancies and the replacement with FBTs further weakens the tenant's position. If ELMs is to work in an area like Teesdale there needs to be some reform to tenancy legislation to reverse the recent shifts of power and authority to the landlord. Tenancies need to be longer term and with a more cost effective and responsive arbitration system than the "in house" system of the Land Tribunal staffed by land agents regulating the activities (and atrocities) of their fellow land agents. Farmers with a long term financially secure business will be more able to engage in ELMs and its aspirations.' **Advisor or consultant**

Advice and farm clusters

Advice will be important to ensure participation of tenant farmers and there is a call for a local project officer who can build relationships at the grass roots level and have meaningful dialogue with farmers. Schemes such as Environmentally Sensitive Areas and Catchment Sensitive Farming are suggested as positive models to follow.

Many tenant farmers mention the positive potential of using farm clusters to aide collaboration and increase participation.

'In our NFFN ELM Farmer Survey (July 2020), we asked farmers what the key barriers and solutions for participation in ELM are. Key barriers were 'knowing what

the scheme will look like' (53%), 'financial benefit' (53%), and 'understanding how ELM fits into your business and farmed landscape' (50%). The most popular solution for participation was through 'clusters of farmers' (53%), and the least popular option was 'government body demonstration' (10%). This shows the importance of existing networks and peer-to-peer learning from trusted sources.'

Group of Farmers

Small farms and commons

There are a high proportion of tenant farmers on common land and many submissions also raise issues related to common land (as discussed below). In addition, many tenant farmers raise issues specifically related to their smaller size, most noticeably the need for ELM to ensure that small farms (including those under 5ha) are eligible to participate.

Other specific considerations

Specific considerations that tenant farmers and interested stakeholders would like to see addressed to ensure tenants do not have difficulty participating with ELM, or are not excluded, include:

- Term or length of agreements (for instance often the length of tenancies can be shorter than the length of scheme agreements so there is a need for flexible or shorter ELM agreements);
- Design the scheme so that tenants are not required to seek landlords' consent;
- Address situations where landlords have reserved rights within agreements;
- Do not rely too heavily on woodland planning or inclusion of forestry which can potentially exclude tenant farmers (tree planting can be forbidden by landlords via restrictions in leases);
- Ensure ELM pilots include agreements at different scales including small farmers.

Commons

Submissions referencing commons come primarily from groups representing the interests of commoners; or a particular geographic location; and key stakeholders – with relatively fewer submissions from individual commoners.

Culture and heritage

Many commoners would like to see the maintenance of culture and heritage have a higher profile within ELM, either by explicit inclusion within the principles and objectives or the activities included across tiers. They would like to see support for farming communities *to 'pass on customs, practices, traditions, skills, and values in order to deliver the "beauty, heritage and engagement" public good'.*

There is a perception that currently within ELM the emphasis is on the management of natural resources with relatively little reference to the cultural and historic landscape.

Some call for a scheme that supports the human element of the of the landscape; for instance, support for visitor management, ranger services and public facing services to enable nature recovery at the New Forest (at tier 2).

'Although ELM talks of culture and heritage there is no reference to this within the two objectives. Dartmoor has a rich archaeological landscape and in previous schemes investment has secured enhancements alongside environmental gains for habitats and species. We feel this should be recognised alongside specific practices such as commoning and the maintenance of locally distinct livestock breeds. The insertion of the word 'cultural' after environment could address these points.' **Farming representative group**

'We also suggest that the description of the public goods on page 7 is broadened to include cultural heritage, landscape and access. The system of commoning and smallholding underpins the range of public goods provided by the New forest and it will be essential that the new ELM scheme can support this commoning system.' **Farming representative group**

Indeed, a minority would like to see a specific package within ELM aimed at commons to reflect their particular characteristics.

'Offer a specific package for commons, which present a unique and complicated situation requiring tailored and deliverable policies and funding mechanisms, with shared management and ownership as critical.' **Environment or conservation organisation**

Allow for the complexities of common lands

The issue of the different land ownership structure of common land compared with sole occupancy land is consistently raised alongside the need for the design of ELM and its tier structure to take account of this. The land ownership issues mean a more complex administrative process is required which will be time consuming – and this needs to be taken account of within ELM.

In addition to the administrative elements, significant issues around collaboration are raised:

- Time is required to build consensus and collaboration between land managers and coordinate agreements: it can be difficult bringing different parties together (some suggest ELM should looking to build on existing models e.g. Bowes Moor HLS agreement);
- The need to engender group working and create collective responsibility whilst ensuring that participating farmers have sole responsibility for their actions: there is a need for individual accountability withing any group/landscape agreement;
- Schemes should be designed so that an individual farmer can say no to a group scheme without negatively impacting on other farms: participants should not be liable for a penalty if one person 'sabotages' the scheme.

'Due to administrative complexities, the current approach to commons makes it difficult to deliver agri-environment schemes. For example, the requirement to have only one agreement for a common, even when there are multiple landowners, and that this single agreement needs to be with a commoners association, adds a layer of administrative burden that complicates the process to participate in an agri-environment scheme. Another administrative complexity is how payments are authorised. For large-scale projects, farmers, land managers, and commons associations have had to finance reports and large-scale project works before receiving grants. This has put farmers off doing large-scale landscape improvements.' **Defra arm's length body**

For some the solution to these complexities is to develop a landscape scale approach to commons management whereby the involvement of multiple landowners is possible within a single agreement whilst enabling farms to have separate agreements within ELM.

'The NFU's initial guidance is that common land should have its own ELM agreement separate from a farm's main holding, as is the case currently under CS. Common land should be able to enter into a Tier 1 agreement as well as the other parts of ELMs.' **Farming representative group**

Flexibility of payment to reflect landholding complexities

There are suggestions that it will be necessary to ensure there is an element of flexibility in the way in which ELM payments are made to the various beneficiaries and that this is determined at the local level. The example of The New Forest HLS scheme illustrates the complexities of a multi-organisational collaboration which supports a wide range of projects and an agreement which covers over 20,000 hectares of land and is delivered by hundreds of individual commoners.

There is a strong view that it is important that the basis for determining the payment rates is flexible and tailored to the individual scheme and that the way in which payments are made to the various beneficiaries is not too prescribed. In addition, the payment rates must recognise the complex administration and time required to form agreements.

A frequently raised issue is that collective agreements on common land must not require everyone with legal rights to sign up to an agreement as this is seen as *'a recipe for individuals/small groups to hold others to ransom'*. This is thought to unfairly disadvantage the other commoners. If a majority want to go ahead with a scheme this should be sufficient, if backed up by a clear and transparent consultation process and a robust dispute mechanism process.

Dedicated advice and support

There is a call for the provision of advice and support that is dedicated to common land so that claimants and applicants have direct access to someone that has in-depth understanding of the commoning system and previous experience of co-ordinating

schemes. Some suggest the New Forest Land Advice Service, which is funded by the current Higher-Level Stewardship Scheme, as a model for this; and some would like to see a common land team within the Rural Payments Agency.

'If commoners will be applying for support directly from Defra (Rural Payments Agency) then it is essential that there is a common land team that is able to provide this specialist advice. This has been a serious omission from the Basic Payment Scheme.' **Farming representative group**

Involvement of small farms

The issue of smaller farms is frequently raised – and that ELM should be inclusive and ensure that smaller farms (under 5ha) are eligible for participation and not excluded from the scheme. There is a perception that smaller commoners are currently not always adequately consulted when developing plans to deliver local environmental priorities. Some call for commons associations and where available commoners' councils to play a critical role in the selection of both local and national priorities over extensive areas of common land.

'The big landowning bodies (private and charitable), public sector agencies and conservation charities seem to get their ideas and priorities forwards, while those delivering the schemes are left to make the best of the job and what is offered. This is not an acceptable way to work and often ineffective. When there is no input from those on the ground with the local knowledge and experience, local priorities can remain a paper exercise as they are undeliverable in the real world.' **Farming representative group**

Land use change at Tier 3

A minority of commoners express concerns about the potential for unintended negative consequences for common land around the proposed tier 3 approach, particularly from the Federation of Cumbrian commoners as outlined below:

'Well-funded land use change projects could encourage the extinguishment of common rights on common land over time and a clearance by stealth of commoners. We are already seeing landowners taking hill farms with commons rights in hand or reletting farms without commons rights. With more common land under the control of common landowners (as rights of common aren't available to use), the easier it is for landowners to enter land use change projects (tier 3). Equally we are starting to see clauses in farm tenancies reserving carbon to the landlords. This may be because landlords/common owners see tier 3 offering them a new income stream to the detriment of tenants and commoners who may be obliged to give up farming. If the main purpose of tier 3 is to slow climate change, we suggest you consider taking tier 3 out of ELM altogether. These initiatives could be funded through a dedicated climate emergency mitigation fund.' **Farming representative group**

Other specific areas for inclusion and greater emphasis

Specific areas identified for inclusion, or to be given greater prominence in the ELM scheme, include:

- Greater recognition of the role of grazing livestock, including hill ponies and horses as legitimate grazing animals, and support particularly for native breeds;
- The use of established groups, associations and societies, to build on existing knowledge and collaborations and particularly commons councils and associations;
- Ensuring that agreements on commons take account of the multiple benefits delivered on commons;
- Concerns about a 'whole farm approach' which could be problematic for some e.g. hill farms grazing livestock on commons as part of their overall farm business where they may want to be in a different tier for the common compared to their land at home;
- Inclusion of payment for removal of non-native species and habitat restoration.

Uplands

Submissions specifically relating to uplands are almost equally divided between responses from land managers and from other bodies including advisers and consultants, lobby and special interest groups, environmental and conservation groups and key stakeholders.

Diverse character of uplands

There is a call for greater recognition of the diverse nature of uplands and explicit mention of uplands within ELM. The scheme should not assume that all uplands are the same but accommodate their diverse nature including different: farm business types; land management/ownership models; geographical locations; soil types; weather patterns; and local wildlife variances. There is concern that current the upland policy assumes that all uplands are the same, for instance that all have the same growing season.

'Point e) is very important as the present & previous schemes were too rigid with dates & stocking rates with the vastly changeable weather we now experience. The effect of lumping locally varied land types into a large group e.g. upland, does not work well with these rigid rules, much better to have this payment by results idea so that the individual farmer can make the best decision based on knowledge of his/her land.' **Upland farmer, Yorkshire & Humberside**

'Geography is important, prescriptions cannot be UK wide as we know upland differs even within an area like the North Pennines and is totally different to upland in for example the Lake District or Northumberland National Park.' **Land manager, North West**

Preservation of uplands landscape and heritage

Some would like reassurances that the ELM scheme will preserve the unique uplands landscape and would like more detail about how the scheme will preserve the landscape features and heritage of upland areas.

'There appears to be lack of detail. For example, the upland areas have strong landscape/historical features including walls and it is uncertain how/where in the scheme these features will fit; although the assumption is that features will be supported in tier 2. It is vital that features including stone walls are incorporated into a scheme as they are strong landscape/historical features and they also support the local economy in terms of employment opportunities for local contractors.' **Farming representative group, North West**

'Tier 1 ought to recognise/reward management & maintenance of existing heritage and biodiversity infrastructure such as dry stone walls, hedges and woodland. Tier 2 ought to recognise/reward management and maintenance of land subject to permissive or open (CROW Act) access.' **Land Manager, Yorkshire & Humberside**

Lack of opportunities for uplands within ELM

In addition to respondents with a specific focus on uplands other key stakeholders also express a concern that as currently proposed, ELM does not include sufficient opportunities for uplands areas to participate. This is in part due to the objectives implying that only environmental improvement, rather than maintenance, will be funded as well as the lack of detail on the proposed activities, particularly at tier 1. Suggestions include: the planting of trees and shrubs; herbal leys; carbon management plans; soil management measures; management plans for existing woodland such as pest management; maintenance of historic features; and enhanced public access and engagement.

'We would like some additions to ensure that tier 1 actions are not lowland focused but provide for uplands and commons.' **Defra arm's length body**

'Again, there is no detail which can lead us to conclude whether some of the environmental challenges associated with agriculture in the uplands will be addressed. It is unclear what the balance will be between regulation and payments under tier 1. Tier 1 has the opportunity to encourage practices away from those that cause pollution of waterways and damage to soils to practices that nurture soils, sustainable farming systems and biodiversity. It would be useful once there are more details of the tiers to assess evidence that underpins the decision making.' **Farming representative group**

Payment

There is a perception that upland farmers will be particularly sensitive to the transition away from direct payments and concern that if ELM is implemented too quickly, before

sufficient detail has been decided and disseminated, it could negatively and disproportionately impact upland farmers. Some feel that key options for upland farmers are missing from the ELM 'toolbox' and that payment levels for Less Favoured Areas should be at an enhanced level in order to compensate for the fact that their land is "less productive".

There is widespread rejection of using income foregone as a method of payment calculation for upland farmers which they believe will not be adequate to make ELM economically viable and therefore encourage participation in the scheme.

'Income forgone is NOT the way to calculate payments and in the past, it has resulted in paltry payment rates for grassland options, particularly in the Severely Disadvantaged Area (SDA), thus resulting in poor uptake of Countryside Stewardship Mid-Tier.' **Farmer, East Midlands**

'In much of the uplands the income foregone of livestock enterprises is low but the value of the environmental benefits provided to society is high. This means payments based on income foregone plus costs may well not be sufficient to encourage farmers to participate in ELMs and deliver the public goods being sought. Participation is also linked to the structure of the scheme, the risks of penalties of unintentional non-compliance and how administrative errors are handled. An alternative is that payments are a hybrid calculation for all three tiers reflecting the desire to maximise value for money and public good outcomes through businesses also producing goods sold at the till.' **Farming representative group**

Grasslands

A common concern amongst upland farmers is that ELM will not sufficiently acknowledge or reward upland/hill grassland farming. There is a perception that currently the scheme is geared towards arable farmers and there is a desire to see similar level of opportunities for grassland upland farmers to enter the scheme in a way which is financially viable.

'There has been an unwelcome period where farms, particularly in the upland areas, have lost out on environmental schemes. This has been because they are all grass, many with permanent pasture and the payments for all grass upland farms are much lower than those for the lowlands, but land in the uplands is just as important to the farm business. (This is partly due to use of Income Foregone calculations). The scheme has to show at the outset that there is something in this for all land types and areas.' **Farmer, East Midlands**

'Management too prescriptive or unrealistic e.g. in the current scheme, all grassland options prohibit any sort of supplementary feeding. This makes the scheme completely inaccessible to a lot of hill farmers, for example. The new scheme needs to be outcome based - the farmer knows what he is aiming to deliver, and it should be up to him to work out how to do that.' **Adviser or consultant, North West**

Grazing livestock

There are conflicting views about the use of grazing livestock on uplands. Some see grazing animals, particularly sheep, as damaging to the environment and do not want to see this practice sustained by 'grants' from ELM. (N.B. This view is more often held by individual citizens and those supporting the principles of rewilding.) In contrast there is support amongst upland farmers and farmer associations to protect traditional methods of rearing livestock in an extensive way in uplands areas, including supporting livestock grazing and native breeds.

'Need a scheme specific to the uplands, want to recognise the huge benefits of grazing livestock and have a better understanding of their place in agreements.'

Farmer, South West

Other specific considerations

Specific considerations that are raised in relation to uplands include:

- The importance of supporting forestry and agroforestry in upland areas;
- Concern that proposals at tier 3 could be divisive if they are only applicable to large landowners and are not inclusive enabling smaller land holdings to work together collaboratively;
- The benefit of using existing groups, structures and models to support collaboration and participation e.g. CS Facilitation Fund groups and the Catchment Sensitive Farming model;
- Ensure local decision making (within national priorities) with a place-based approach such as Local Nature Partnerships, National Park Partnerships, AONB Partnerships and groups based on National Character Area.

Woodland, trees and forestry

Submissions focussing on woodland and forestry issues are fairly evenly balanced between land managers and foresters themselves and other stakeholders including consultants/advisers, environmental charities, lobby groups and sector stakeholders such as Woodland Trust, Confor, Forestry Commission, Institute of Foresters and the Royal Forestry Society.

The themes identified below appear to be consistently raised across different types of stakeholders, however, the NFU would like to see a separate budget for forestry retaining ELM as a purely farm-based scheme.

All land managers not just farmers

There is a desire to see ELM, and the woodland and forestry aspects in particular, applicable across all types of land manager and not reserved purely for farmers. This is

considered to be key to achieving environmental targets and the Government's priority of increased planting of trees and woodland.

'We urge that the scheme is focused on environmental benefits achieved by all land managers and it should be blind to the type of land manager. Otherwise the scheme will create a new un-level playing field. We are concerned the current proposals as laid out in the consultation document are overly focused on the farmer as the land manager. This undervalues the very many other forms of land manager and we hope that the proposals will be re-engineered to ensure the scheme facilitates environmental benefits from the best land management practices, regardless of who that land manager is.' **Environment or conservation organisation**

'Furthermore, the intention to limit tier 1 to farmers, excluding foresters and other land managers, is inconsistent with principle (d) participation and collaboration.' **Environment or conservation organisation**

Inclusion of woodland creation/tree planting at tier 1

There are calls for woodland and forestry to have a higher profile within ELM and to include woodland creation and tree planting activities at all tiers, and particularly at tier 1 where it is identified as being a missing element. Suggested actions for inclusion at tier 1 are: small scale planting; agroforestry; tree health measures; and deer/grey squirrel management. This is linked to the point above that tier 1 should be open to all landowners or managers and not limited to farmers. Some see the inclusion of tree planting at tier 1 for peri-urban and urban land as having significant potential to deliver on the key target area of tree planting included in the 25 YEP.

'By allocating woodland creation and forestry to tier 3 you are potentially restricting its uptake and reinforcing the cultural presumption that forestry isn't really for farmers. Forestry options need to be available in all the tiers in order to encourage the breakdown of cultural barriers between farming and forestry and to avoid the mistake of perpetuating unimaginative silo thinking.' **Forester**

'... to exploit the enormous potential of woodland to deliver public goods, it is essential that all three tiers of ELM should offer woodland options, and all these options should be available to all land managers.' **Defra arm's length body**

Alongside this ambition to include woodland options at tier 1 is a request from land managers and foresters to make accessing and applying for tier 1 funds straightforward and simple.

Importance of trees outside woodland

Many submissions emphasise the importance of trees outside of the woodland and would like to see this reflected in ELM with greater flexibility of approach across all land types (including urban and peri-urban) and more 'cross functional land management'. As part of

this land managers would like to see incentives for: planting of 'in field trees'; the protection of trees from livestock during establishment in arable fields; and the reduction of the minimum threshold for woodland schemes reduced from 3.0 ha to 1.0 ha to increase the level of participation. There is a desire to see tree planting included in ELM with a greater variety of options including managed natural regeneration and agroforestry.

'Advice and action types should seek to break down the compartmentalisation of land use types (i.e. horticulture is not considered farming, woodlands are considered sterile for agriculture, trees in fields a nuisance etc.) - again, applying holistic thinking but also promoting practices which integrate land uses e.g. silvopasture, agroforestry.' **Farmer, South West**

'Agroforestry must be included. It is very important that it is recognised within Defra that agriculture and trees can coexist in the same field parcel. We must get away from the principle that land is either agricultural or woodland and the agricultural imperative that trees and scrub are bad.' **Special interest group**

Payment, capital investment, long term support

Several issues relating to calculating payment for woodland creation are raised:

- **Need for capital investment:** seen as critical to the success of achieving environmental outcomes and necessary at all tiers;
- **Payment for management of woodlands:** seen as equally important as payment for creation and that it is a false economy to fund tree planting without providing ongoing support for long-term aftercare and maintenance;
- **Need for longer term contracts:** to reflect the need for funding ongoing maintenance, but also to ensure the benefits of trees and woodland are calculated over a sufficiently long period of time and recognising the natural capital benefits trees provide over the long term (e.g. *'period of at least one hundred years'* or *'carbon sequestration projects require a minimum of 50 years'*).
- **Concerns about income foregone calculations:** as these do not adequately reflect the points made above;
- **Tax implications:** of the current proposed changes are raised by some stakeholders since currently forestry grants and income are not taxable.

Some stakeholders criticise the current CS Woodland schemes where payment rates have not encouraged high levels of participation. The suggestion is to address this by having longer, 20-30 year, agreements with a combined woodland establishment and management grant.

Regulation and joined up Government

Land managers and stakeholders would like to see ELM more fully recognise the regulatory complexities and dependencies involved in forestry and woodland management. There is a call for joined up Government to ensure that the customer journey is as seamless, integrated and efficient as possible for applicants, and accounts for all the relevant regulatory bodies (including those outside of Defra). There are concerns

about the possible interaction of ELM with existing regulation and a suggestion for a single point of accountability.

'On a recent project to restore an ancient woodland, I had to contact 10+ Government organisations (Defra/Natural England, The Forestry Commission, The Woodland Trust, Derbyshire Wildlife Trust, The National Trust, The Parish Council, The Whaley Bridge Town Council, The High Peak Borough Council, Derbyshire County Council, the Local Planning Committee and tree expert, The Rivers Trust, The Canal and Rivers Trust) all of which took half a day visit for which they were all being paid for. Then also local politicians, members of the public and private surveyors (ecologists/bats/drainage/etc. etc. which I had to pay for and take time to show around).' **Land Manager, East Midlands**

Need for specialist advice and facilitation

It is acknowledged that advice will be required, especially at the start of the ELM scheme, and that advisers will need to be experts (potentially requiring training) so that they have knowledge of both how to achieve environmental outcomes and also of the ELM scheme mechanics.

'A lesson learnt from previous schemes is that landowners must have access to a network of community-based, trusted expert co-ordinators whose role it is to coach, inspire, enthuse, educate, hand-hold, form-fill and connect-up farmers through the transition process. However, there must be experts across many specialist fields including tree ecology and the biodiversity and other public goods provided by wood pasture and parkland and other priority habitats or historic landscapes.'

Environment or conservation organisation

'Tier 1 generalist advisers need to have an overview of forestry options to highlight potential and steer applicants towards creation and management, particularly if tier 1 applicants are likely to come from BPS with little previous engagement with woodland options.' **Joint forestry sector response**

In addition to advice some respondents also see an important role for facilitation, mentoring and advocacy and believe work will be necessary to upskill woodland owners and land managers. Some would like to see a facilitation fund available (similar to the farmer facilitation groups).

Invasive species and deer/squirrel management (biosecurity)

An area of concern thought to be missing or unclear in the ELM proposals is that of invasive non-native species and issues such as the management of deer and squirrels. Respondents would like to see incentives focused on cooperative action between landowners. Since these require a landscape-scale approach, some feel it may not sit easily within the tiered approach, whereas others think there could be potential for this to be included across all tiers.

Natural regeneration and rewilding

There is considerable support, particularly amongst environment, wildlife and conservation organisations, for supporting the creation of woodland for support by natural regeneration within ELM.

'Those who wish to expand or create woodland by natural regeneration should not be at a disadvantage compared to those who plant trees.' **Environment or conservation organisation**

However, the issue of rewilding in the context of woodland and forestry is potentially divisive. Supporters of rewilding believe that woodland and forestry can play a critical role in tackling the climate emergency, the biodiversity crisis, and provide the potential for the landowners to diversify. However, there are strong objections to large scale tree planting and woodland amongst a minority of land managers, particularly amongst livestock farmers.

'I agree with all the design principles, but I feel that one is missing: "Educate the General Public about sustainable land management practices and the Countryside Code." People in the UK do not generally have a good grasp of farming, forestry and other land management. Currently a significant majority believe no tree should ever be cut down, which leads to condemnation of woodland management activity including coppicing. I can also foresee a clash between a growing anti-livestock lobby and the need for ruminant-based farming systems that make use of marginal and high-biodiversity land while sequestering carbon, as well as problems stemming from the combination of increased public access with rewilding.' **Land manager, South West**

'I have grave concerns about "rewilding Britain scheme" especially regarding the extra demands the population is putting on the water resources of the country. The additional burden of thousands of trees will have a detrimental effect on the groundwater supply. The Government must "ensure/guarantee" that homeowners with private water supplies will not see a severe loss of their water as we have experienced here in the uplands due to hundreds of trees being planted and see as a cash cow for absent landowners. We will lose our small dairy/sheep farming most of which are managed by families who have been there for decades. The family smallholdings in Europe will continue and be valued by their populations and the UK will lose those local bred and produced labels.' **Land Manager**

Heritage

The submissions relating to heritage are mainly from organisations rather than individual landowners or citizens. These include lobby groups and special interest organisations, local authorities and key stakeholders such as Historic England, Chartered Institute for Archaeologists / Council for British Archaeology and The Heritage Alliance

Greater emphasis on heritage and history

These organisations would like to see greater emphasis given to heritage and history within ELM; some would like to see heritage identified as a stand-alone public good within the document rather than being grouped together with beauty and engagement as it currently is. They would like to see ELM having a more holistic view of the inter-relationship and interconnectedness of heritage with the environment.

'There is a complete lack of examples of historic environment actions across the tiers. There is a failure to include or acknowledge Historic Environment specialists and sector leaders Historic England and ALGAO as key partners in delivery. Many professionals and land managers reading this document will fail to recognise that heritage forms a target within the scheme.' **Non departmental public body**

'And in some regions of the UK, farming produces and sustains cultural heritage that has obvious intrinsic significance and value, and which should be recognised and rewarded through any future ELM scheme as a clear and distinct public good.'

Environment or conservation organisation

No detriment rule and multi-objective principles

Key stakeholders would like to see the inclusion of two further design principles to ELM: firstly the 'multi-objective principle' that ELM should encourage participants to achieve more than one environmental objective; and the 'no detriment principle' that one environmental goal should not be achieved at the cost of damaging another goal.

'Having learned the lessons from taking such an approach in ESA and CSS schemes (specifically that Scheduled Monuments and other heritage features were less likely to be in favourable condition when falling within an agreement than land outside agreements) - a key principle of ES and CS is the "no detriment rule" - simply that achieving one environmental objective should not prejudice another. We think it vital that this and the multi-objective principle are retained within ELM. To not do so will reintroduce inefficiencies and additional costs (associated with subsequent remediation), and potential damage to the historic environment features themselves.' **Non departmental public body**

Inclusion of detailed heritage options within ELM

There is concern that heritage was left out of the detailed proposals within the PDD and that although it was acknowledged at a high level, the omission of the practical development of the detail of ELM could mean the full public benefit of heritage will not be realised.

Stakeholders would like to see all tiers to be available to all land managers and not restricted to just farmers; and would also like to see capital investment options included as well as maintenance payments. There is a particular call to feature heritage and historic environment options at tier 1.

'The tier 1 activity types, which are designed to be universal, do not currently include any heritage activities. There seems to be no particular reason why this should be so as the conservation of heritage assets would meet the tier 1 purpose "To incentivise environmentally sustainable farming and forestry and help to deliver environmental benefits".' **Local Authority**

Need for farmer buy-in and emotional connection

Several respondents identify a need for obtaining farmer buy-in for heritage, raising the issue that land managers may be challenged by the idea of being asked to be environmental conservators and not farmers and this could act as a barrier. Building good relationships, providing support but also building an emotional connection with the heritage of the landscape is thought to be critical

'A focus in marketing ELMs to participants, on the importance of place, of a connection to the land and 'protecting' the landscape for future generations, would help participants emotionally engage with the scheme and understand benefits that are outside of the tangible.' **Lobby group**

'In our experience, land managers have a deep connection to their land. Unlocking these connections between what matters to them and the objectives of environmental net gain can be an effective way to secure long term buy-in to environmental benefit creation. For example, understanding that farming has created the cultural legacy that we wish, as a society, to sustain for its social and environmental benefits can have a powerful and positive effect on the land manager.' **Special interest group**

Land boundaries

The one specific heritage related activity that is consistently identified for inclusion in ELM is supporting the maintenance and restoration of boundaries, an issue that particularly resonates with land managers. (Less frequently mentioned, however, is farm building maintenance.)

'Field boundaries are an important element in all areas, but boundary types and styles do vary. Including Boundary Maintenance in tier 1 will be a big draw for many livestock producers but could also benefit crop producers. This will provide a win in terms of landscape, environment, habitat, farm management and help to preserve cultural heritage, and also ensure that funding stays in the rural community.' **Land Manager, East Midlands**

'Does a 'heritage asset' include field boundaries and field barns?' **Land Manager, North West**

Need for tailored advice and information on heritage assets

There is general agreement that advice is important and often a necessary component of delivering a scheme, particularly at the higher tiers. There is a call for specialist, tailored advice but a concern that specialist advice bodies (e.g. local authorities or Historic England) may not have the resources to provide this without funding.

'For both tier 2 and tier 3 applications case by case expert advice will be critical if the scheme's objectives are to be met. For tier 2 applications, advice will be needed to identify heritage assets on the holding (although this might in part be self-administered via a website) and certainly to advise on the significance of those assets and the impact of possible actions on them. This advice cannot be pre-planned or automated because the individual context of land holdings varies so widely.' **Local Authority**

Public access and rights of way

Submissions with a focus on public access and rights of way are almost equally divided between land managers and lobby groups, or special interest groups with a particular interest in promoting public access e.g. The Ramblers or Local Access Forums. In addition, the submissions linked to the horse access campaign raised this issue. Finally, public access was also raised by a number of key stakeholders.

Divided opinion

Public access is an issue which divides opinion amongst respondents with land managers and farming organisations expressing concern about increased public access as a result of the introduction of ELM whereas lobby groups and special interest groups calling for a greater emphasis on public access within ELM.

Include explicit mention of public access in ELM

Many of the key stakeholders and lobby groups want to see explicit mention of enhanced public access to the natural environment within ELM. There is a general perception that references to 'engagement with' the natural environment are not sufficient and the design principles need to be altered to include public access. These stakeholders point to the fact that the importance of connecting people with the environment is identified as a theme of the 25 YEP and therefore the public good/benefit of access would be directly acknowledged in ELM.

'Firstly, the proposals should make it clear that ELM will be a mechanism for improvements in public access to the natural environment. References to 'engagement with the natural environment' do not offer reassurances... Secondly, strategic objective 1 must be more ambitious so that the default objective will be to deliver multiple environmental and public access benefits within the same

landholding... Finally, strategic objective 2 must make clear that financial assistance will not be given to landowners and managers in order to fulfil their existing legal duties, such as responsibilities for public rights of way (under the Highways Act 1980). As drafted, it is unclear what is meant by the broad statement 'environmental challenges associated with agriculture' and payments should not be provided to simply meet a basic level of responsible practice.' **Special interest group**

'We strongly believe that the "environmental outcomes" referred to in design principle "a" need to be defined, making it clear that these outcomes include "public access to and enjoyment of the natural environment" including through an improved public path network.' **Lobby group**

In addition to the inclusion of public access within the principles many stakeholders would like to see public access actions included across all three tiers of ELM to enable more people to engage with nature.

'Enable more people to gain access to and engage with nature, with public access included across all three tiers.' **Environment or conservation organisation**

Problems for land managers associated with increased public access

However, increasing public access presents challenges for farmers and land managers who cite a range of problems associated with public access: litter, fly-tipping, vandalism, trespass, gates being left open, dog fouling, sheep worrying, cattle ignorance and wild picnics. Increased public access is often an emotive issue for farmers and could act as a significant barrier to participation with ELM.

'Protect farmers rights from spin off issues that arise from them being in the conservation scheme, such as constant trespass over margins and other habitats, fly tipping, claiming of new rights of way, vandalism of signs, fences, gates and constant rubbish and litter, because the farmer has taken land out of production for conservation and it is being used as public property with no respect.' **Land Manager, East of England**

'We have a vast number of cross-fields footpaths we happily maintain to the best of our ability, the local walkers generally ignore them, and I am utterly and totally sick of having the unwanted and unenviable role of having to point out the rights and wrongs on virtually a daily basis.' **Farmer**

Indeed, some land managers believe that increasing public access is actually in opposition to the objectives of ELM and will result in worse environmental outcomes.

'There is no justification in introducing ELMs at the same time as increasing public access, as it is clear that the public's actions don't care for the countryside anywhere near as much as their words. ELMs should be introduced for the environmental benefits in tandem with food production, and increased public access

should follow once there is clear evidence the work put into ELMs won't be undone by the public.' **Farmer, South West**

'Public access is the opposite of what you're trying to achieve, the public need to be kept out, just look along the roadside at all the plastic bottles thrown out, dog muck in bags hanging on hedges, wildlife killed by out of control dogs. I see this every day. People are nature's worst enemy. We do not expect to enter their homes when they have public fund reduction in council tax or receive universal credit. That is an intrusion of privacy and politely the same protection applies to landowners.' **Farmer**

Many stakeholders and lobby groups acknowledge the potential problems faced by farmers and landowners and are conscious of the need to work alongside them to reassure and identify ways to mitigate risks.

'In creating new Rights of Way or facilitating the use of waterways for recreation, landowners and farmers may feel exposed to the greater liability as a result of welcoming the public onto their land. It is therefore important that these barriers are identified early, and mitigation planned for, in order to give participants in the scheme peace of mind. Guidance on managing public safety and risk should be readily available, to reassure any concerns.' **Special interest group**

COVID-19 highlighted the issue of public access

The COVID-19 pandemic has highlighted both the importance of public access to the natural environment in providing health and wellbeing benefits to the public but also the negative consequences for land managers of increased public use of the countryside.

'The COVID-19 pandemic, ensuing lockdown and 'reopening' of the countryside resulted in a surge of visitors, many of whom were new to National Parks. This has further demonstrated the need for support for managed access in the countryside and the importance of visitors and visitor management to the rural economy.' **Defra arm's length body**

'Whilst the recent pandemic encouraged more to appreciate the countryside, many visitors did not respect it. The latent problems of litter, fly-tipping and a lack of courtesy for nature, understanding conditions for food production, welfare of livestock, wild animals and insects was polarised. With the scale of this problem, it is suggested that an amount of money should be ring-fenced to increase public access, but with important considerations regarding allocation of this funding to address: removal of litter and fly-tipping debris with compensation to farmers for livestock loss through dog worrying (dogs not on leads with owners walking along footpaths/bridle paths, common land), death or injury from litter-intake.' **Farming representative group**

Include public access actions (particularly in tier 1)

There are calls for the inclusion of public access and rights of way actions across all tiers, but most often at tier 1. Suggestions include improvements such as better signing and way marking, accessibility improvements, replacing or maintaining existing access infrastructure such as stiles, gates, bridges, and fencing paths along field margins to protect livestock.

'Rights of way, navigation and recreation infrastructure should be included in tier 1 because of its importance to the public, bearing in mind that existing access and aspirational access often crosses multiple land-holdings where several landowners would need to collaborate.' **Environment or conservation organisation**

'Tier 1 should aim to make the network of existing rights of way accessible for most of the year to all legal users, through a number of simple actions.' **Defra arm's length body**

However, the issue of landowners' current legal responsibility for much of the key infrastructure (gates and stiles) on public rights of way in England is also raised and caution against including actions in ELM that would result in paying landowners to meet their legal requirements.

There were mixed responses in terms of the tier structure and how to approach the issue of improving public access and rights of way provision across multiple landholdings. However, the consensus was that the tier structure needs to be flexible to accommodate different requirements.

'A more wide-ranging and ambitious approach should be taken to the ways in which all three tiers can incorporate public access. This will provide benefits for the public as well as providing landowners and managers with a range of options for which they can receive financial assistance. As we set out below, some interventions will be relatively straightforward to implement while others will be more complex as part of landscape-scale change across multiple landholdings.' **Special interest group**

Consider public access not just for walkers to ensure enjoyment

Several of the special interest groups raise the issue of considering public access issues beyond walker: they would like to see access to and enjoyment of the countryside improved for a range of activities including cyclists, horse-riders and carriage-drivers, canoeists, and climbers amongst others.

'To date landowners and authorities think that footpaths are public access, they only cater for walkers and discriminate against other users. 90% of riders who hack out are female, many of whom do not feel safe walking alone, so ride instead.'

Farmer, Yorkshire & Humberside

Consultation and engagement with user groups and landowners

The importance of consultation and engagement with user groups when developing plans for increased public access and rights of way and identifying of 'missing links' is stressed by several stakeholders. There is a call for the designation of new access routes to be made on a consultative basis with Parish Councils and user groups as well as landowners. There are also suggestions that local user-groups could be responsible for low-level maintenance activities.

'Public access should aim to implement new paths and upgrade footpaths to multi user paths, in a similar manner to the old Higher Level Permissive Bridleway scheme. However, that scheme was flawed as there appeared to be NO consultation with local riders or the BHS. (I was on the County BHS committee at the time and received no communication from Defra regarding these new routes.) Some of these routes were a complete waste of public money as they were in the wrong place for potential users and had few new users, although the rate of remuneration was satisfactory.' **Farmer, West Midlands**

There are suggestions, particularly from local authorities, that ELM presents an opportunity to build on and implement themes that are identified in Rights of Way Improvement Plans (RoWIPs).

Key stakeholders

Defra's Key Stakeholders represent a diverse range of interests and perspectives and their submissions were often lengthy responses providing details about their particular area of speciality or interest. Analysis of these responses has been reflected in the preceding chapters and the views of key stakeholders are mainly in line with those of the main body of responses to the discussion. This chapter presents a summary of the themes within the submissions from the Key Stakeholders which differ in either viewpoint or emphasis from the main body of responses.

Be more ambitious

Although key stakeholders are broadly supportive of the objectives and design principles of ELM there are significant calls for greater ambition. Many key stakeholders would like to see the objectives strengthened and developed and make specific suggestions for the inclusion of additional or amended principles. In particular there are calls for the objectives to: address the longer term challenges associated with agriculture; support a transition towards sustainable farming and forestry; and to provide a step-change in the way land and food production is managed. The need for greater ambition (and funding) underpinning ELM is seen as being particularly important given its role in delivering against the environmental goals of the 25 YEP.

'We feel there is significant ambiguity in the level of ambition encompassed by these overarching objectives. We strongly suggest that ELM design has to be underpinned by a clear vision that recognises the environmental and economic shortcomings of existing farming and forestry systems and the need for fundamental reform.' **Defra arm's length body**

'The Tenant Farmer Association supports the principles and objectives of ELM (making public payment for public goods) but expresses disappointment at the level of 'aspiration and innovation' in the PDD. It wants reassurances about how it will sit within the wider policy environment [and] that it can respond flexibly to the international trading environment post 31st December.' **Farming representative group**

Inclusivity

There is a call amongst the majority of key stakeholders to ensure the scheme is universal, especially at tier 1, and that it is accessible to all land managers, all sectors and all land tenures. Many key stakeholders explicitly pick up on the wording in Principle D that talks about '**most** farmers foresters and land managers' would like to see this replaced by '**all**' to demonstrate the ambition that there will be 100% eligibility.

'Expand the scope of the CS to also be practical and accessible to: peri-urban and urban farms; those below 5 ha horticulture including orchards and protected

cropping; those below 5 ha small mixed farms; those below 5 ha; and agroforestry will need long term contracts. **Farming representative group**

'The language and principle of ELM proposals should look to integrate and reward all land managers in the delivery of public goods.' **Defra arm's length body**

However, the notable exception to this is the NFU which, whilst it would like to see opportunities for '100% of farmers and growers' to uptake offers within ELM, would also like to see the scheme focused solely on farmers and growers rather than other types of land managers.

Tensions between agriculture and environment

The greatest tension apparent within submissions from key stakeholders (which reflects the main body of responses) is between those with a focus on agriculture and food production versus those with an environmental outlook. This is clearly illustrated by NFU's call for ELM to focus purely on farmers and growers with environmental activity beyond farming funded through different mechanisms; whereas the Wildlife and Countryside Link coalition think ELM should not be viewed as an agri-environment scheme.

'The scheme should be focussed solely on farmers and growers given Defra's pledge to reinvest reductions in direct payments directly in farming. These should be long term commitments to farming. As is currently the case, environmental activity beyond farming should be funded through other mechanisms.' **Farming representative group**

'ELM should not simply be viewed as a new 'agri-environment scheme'. It is the foundation of a new, integrated approach to restorative land management that should remove artificial distinctions between farming and forestry, open up the countryside to the public, reduce the adverse and unintended consequences and costs of intensive agriculture, underpin more environmentally sustainable food and timber production, and help land management businesses diversify and become future-fit.' **Environment or conservation organisation**

The tensions seem particularly acute at tier 3 which is seen to present the biggest challenges for farmers (particularly small and tenant farmers) to participate in. Indeed, the NFU is calling for tier 3 to be designed as a separate scheme with a separate budget.

'Tier 3 would be extremely difficult for farmers and growers to engage in. Tenants will not have the length or tenure to engage with this tier and in most cases would be in breach of their tenancy agreement if they did. In most cases it appears to remove land permanently from agriculture. Where this is the case, the NFU believes that tier 3 should be a separate scheme with a different funding stream, not drawing down budget from previous CAP budgets.' **Farming representative group**

It is acknowledged that work will need to be done in order to overcome these tensions. Many key stakeholders believe overcoming farmer and land manager perceptions that sustainable practices will lead to reduced profitability (particularly amongst those that have less experience of agri-environment schemes) will be critical. The success of ELM, particularly at tier 1, is thought to be heavily dependent upon the levels of farmer participation and that although the actual payment structures and levels are critically important, so too will be farmer perceptions of ELM. Engagement with the farming community will be key: several key stakeholders suggest that the best way to achieve this is by using positive case studies, demonstrating the practical implementation of the scheme at farm level, celebrating the successes and developing 'champions' to build the reputation of ELM within the farming community.

'One particular aspect that we do feel will be important is applied demonstration in real farm settings. Our experience indicates that farmers learn from other farmers.'

Defra arm's length body

'A concerted programme of engagement across all communications channels, including face-to-face events, would aid uptake. This should be accompanied as much as possible by farm level case studies setting out what can be achieved through ELM.' **Farming representative group**

Detailed route map for transition

A significant concern raised consistently across Key Stakeholders is that there is insufficient detail in the current ELM proposals and in particular, a strong call for a clear and more detailed route map for the transition to ELM. There is concern about the time scales and whether there is sufficient time available for thoroughly planning the transition to ELM (and communicating the plans).

While many are positive about the initial ELM proposals as step towards the delivery of public money for public goods, there is a view that more detail is urgently needed on the wider agricultural support system and transition period in order to have confidence in the scheme. For some, method of transition is as important as the design of the scheme itself and lack of clarity and potential time lags could pose a significant risk to the success of the scheme.

'A clear road map for the transition period from Basic Payment Scheme and Countryside Stewardship to ELM is crucial to ensure resilient rural economies and local communities; and that natural and cultural assets and rural skills are not lost. Such a 'road map' with clear 'signposting' is an important tool to help land managers make informed choices during the transition period.' **Defra arm's length body**

Linked to this, the importance of the national pilots is raised by the majority of Key Stakeholders. There are significant concerns about the tight timing available for piloting and that if ELM is not thoroughly piloted, there is a danger that it will not meet its

objectives and ambition. Key Stakeholders call for the inclusion of (government) organisations outside of the “Defra family” in the pilot process.

Beyond the regulatory baseline

There is a general consensus amongst key stakeholders that ELM should only reward activities that are above and beyond the regulatory baseline. There is a call for clear communications that compliance (including cross compliance with requirements with other legislation) is a requirement of entry into ELM.

‘Payments should be based on additionality, paying for land managers and producers to go beyond the regulatory baseline.’ **Farming representative group**

‘ELM should only pay for activities over-and-above the regulatory baseline; a baseline which should include current cross-compliance measures.’ **Environment or conservation organisation**

However, there are some reservations expressed about this principle. For instance, one respondent suggests that low current compliance rates could present a potential challenge for participation particularly at the outset of the scheme. The NFU are concerned about the prospect of the regulatory bar being raised over time as actions ‘become the norm’; and that the scheme should support the maintenance of environmental standard and not just improvement.

‘We believe that in principle applicants should already be compliant with existing regulations in order to access public money and that there should be a clear distinction between actions required by existing regulation and those eligible for financial incentive. However, our own assessments suggest current compliance rates with some environmental baseline e.g. the Farming Rules for Water is vanishingly low, suggesting this may be unrealistic to expect at the outset of the scheme.’ **Defra arm’s length body**

Whole Farm systems approach

There is widespread support amongst key stakeholders for the introduction of an integrated whole-systems and whole-farm approach within ELM. Support for this approach appears to be more prevalent amongst key stakeholders than the main body of responses.

‘Support a shift to an ‘integrated, whole-farm, whole-systems approach’ that enables the delivery of public goods alongside food, fibre, energy and other crops. More than another ‘agri-environment scheme’, it should also be a brand-new contract with society and the foundation for ambitious restorative land management... We therefore welcome the tiered structure of ELM, which we hope will allow for a more holistic, whole-systems based approach to environmental delivery.’ **Environment or conservation organisation**

'ELM should encourage a whole-system, integrated approach to deliver resilient, multi-functional landscapes. Land managers should be encouraged to take a holistic view of their holding to identify interventions that deliver multiple public goods, including whole-system approaches such as organic and agroforestry.'

Environment or conservation organisation

However, amongst farming stakeholders, including the NFU, concerns are expressed making whole farm plans mandatory. They raise the issue that farms are not static year on year and regular changes can make whole farm plans difficult to implement – and that greater flexibility is required especially for tenants. This is seen as a barrier to participation with the Countryside Stewardship scheme.

Payment calculations

Key Stakeholders express significant concerns about the inclusion of income foregone within payment calculations and are more likely to endorse the use of outcomes based and payment by results methodologies. The suggestion to use a natural capital approach is also more prevalent among key stakeholders than the main body of submissions. Whilst many recognise that different calculation methodologies are appropriate at different tiers, and combined approaches will be necessary, there is a desire to move towards a greater use of natural capital approaches over time.

'A missing design principle is properly rewarding agreement holders for the value of the goods and services of public goods they provide. Recent indications that the payment principle will be not be based on natural capital value but instead income foregone plus costs. This is worrying as it might not provide sufficient incentive for farmers to participate in ELMs which would not be learning the lesson learnt a) on page 8. While we agree ELMs should be open to all types of land managers, 70% of England's uplands is farmed so in order to deliver public goods at scale, ELMs will need to ensure that the scheme architecture, payments and governance as a package dovetail with the motivation of farmers in the uplands to produce high quality livestock, often with complex land tenure arrangements.' **Farming representative group**

Other considerations

Other areas which are more frequently mentioned by Key Stakeholders than the main body of submissions include:

- **Use of National Character Area** profiles as part of the process for setting local priorities. These are mentioned frequently as a useful tool to be built on;
- **Use existing structures and bodies for collaboration:** Key Stakeholders suggest a range of models which they believe have been successful in the past for enabling collaboration and would like to see these developed as part of ELM. These most

frequently include: Catchment Based Approach; The Countryside Stewardship Facilitation fund; Farm cluster models;

- **Catchment Sensitive Farming** is frequently mentioned positively as a model for how the ELM scheme could promote collaboration by combining advice, regulation and incentives and work across farms and land holding;
- Self-assessment alongside **risk-based, proportionate inspections**.

Appendix 1: Rewilding Britain Campaign

This Appendix summarises the key points from all these submissions of the 209 submissions that were identified as either being part of the formal Rewilding Britain campaign or heavily influenced by and drawn from their campaign submission. The composition of these submissions by stakeholder type is outlined in the table below.

Stakeholder Type	Number	%
Individuals	142	68%
Land managers	22	11%
Environmental groups/charities	12	6%
Lobby group	9	4%
Members of Rewilding Britain	5	2%
Academics, researchers, students	5	2%
Advisors/consultants	3	1%
Other – not stated	11	5%

The majority of these responses to the PDD very closely followed the Rewilding Britain campaign submission with large proportions of the text directly copied from this response or making direct reference to it. Therefore, this chapter does not represent 200 independent viewpoints or different suggestions; rather it represents the views of Rewilding Britain that have been endorsed and supported by 200 respondents.

Design Principles

Q6. Do you have any comments on the design principles on page 14? Are they the right ones? Are there any missing?

Include rewilding as an integral part of the ELM scheme

The absence of rewilding as an alternative land-use was flagged up as a concern regarding the design principles. Many argued that rewilding is a cost-effective land-use option and should be integrated into the principles with utmost importance. The argued benefits of rewilding included *'protecting watersheds, preventing floods and restoring the fertility of degraded land and the complexity of our ecosystem'*. Furthermore, some

responses argue that an emphasis on rewilding projects across the UK would be a *'delivery mechanism for `achieving environmental outcomes`'*.

Key suggestions

Rewilding Britain and their supporters propose that four key principles should be integrated into the ELM:

- *“Ensure that wherever possible measures aim to reinstate natural processes and, where appropriate, missing species – allowing them to shape the landscape and the habitats within.*
- *Ensure that habitat restoration involves natural regeneration wherever possible, and that active habitat management is used primarily to help restore damaged landscapes and natural processes. For example, blocking drainage, de-canalising rivers, removing fencing, tree planting where seed sources are inadequate, replacing functions of missing keystone species (e.g. to control deer populations), and removal of introduced species that disrupt natural processes (e.g. mammalian predators on seabird islands).*
- *Provide support for locally led partnerships that coordinate cohesive action across multiple landholdings to deliver greater benefit at a landscape scale.*
- *Ensure there is a network of community-based, trusted expert advisors to help provide the skills, training, and access to financial support that farmers and other land managers need through the transition process.”*

Quoted in multiple responses

Promote and support the reintegration of keystone species/apex predators

The reintegration of key stone species/apex predators was frequently mentioned in the responses as a method to support local environmental initiatives and control species, such as deer, which have been allowed to grow to the detriment of landscapes and some climate change initiatives such as planting trees. The reintroduction of Lynx is argued to be most effective and acceptable and farmer-lynx conflict was suggested to be compensated through *'reimbursement payment...integrated into the scheme'*.

Transition towards more sustainable agriculture (Increased arable farming and sustainable livestock methods on rewilded farmland)

- Some respondents suggested that the principles should include a transition away from intensive livestock farming and that where possible land currently used for livestock farming could be given over to arable farming with support from employing tax breaks and subsidies.
- Rewilding should be encouraged in instances whereby land is not suitable for arable farming. Many responses used the Knepp Estate in West Sussex as an example of how rewilding areas of *'former arable land can retain good levels of*

productivity and provide multiple benefits'. Benefits include: improved air and water quality as well as soil fertility.

- Low-intensity meat production was noted as a high-value option on rewilded farmland with considerable sustainable benefits.

Increase commitments to education and engagement.

- One of the additional principles proposed by Rewilding Britain focuses on the provision of a developed network of advisors to *'provide the skills, training, and access to financial support that farmers and other land managers need through the transition process'*. Many other responses also iterated the need for improved understanding of natural process to ensure the successful integration of environmental approaches.
- This included emphasis on education *'landowners, land managers, and the general public in land restoration, permaculture, natural habitats and nature.'*
- The use of local knowledge was argued to be highly intrinsic and that locally-led partnerships should be supported to *'deliver a much greater benefit to the landscape as a whole.'*

Objectives

Q7. Do you think the ELM scheme as currently proposed will deliver each of the objectives on page 8?

Not unless rewilding is integrated into the scheme.

Responses indicate that those who responded believe that objectives will not be reached unless the ELMS *'explicitly includes allowing land to return to natural processes'*. The general message from responses suggested that the integration of rewilding would enable objectives to be met: *'Rewilding can be cost-effective and can benefit the agricultural sector by improving soil quality, becoming more resistant to disease. All these things mean rewilding and its principles will help to meet and go beyond these objectives'*.

Objectives lack precision and clarity.

Some responses indicated a concern that the dialogue used is too vague and not ambitious enough to reach climate targets.

Must utilise Marginal Lands.

Rewilding Britain suggest that the use of marginal lands will generate beneficial environmental outcomes whilst allowing high quality, productive farmland to be maintained with no net reductions: *'It is the least productive marginal lands, where the opportunity cost for food production is comparatively small, that provide the best options for carbon sequestration, rewilding and other ecosystem services.'*

Financial incentives to deliver public good and improve wildlife/biodiversity required to meet objectives - “Public money for public goods”.

Rewilding Britain have produced a costed proposal within their Rewilding and Climate Breakdown Report which proposes a model of payments to replace the EU agricultural subsidies. These payments are based on their relative abilities to sequester carbon. It is suggested that activities which generate positive outcomes, such as carbon sequestration and ecosystem restoration, should be rewarded to encourage uptake and consistency. To receive rewards, some suggest that activities must be able to be evidenced and demonstrated to be continuous: *‘Farming for the future should allow farmers to receive additional financial rewards if they can demonstrate successful and ongoing environmental benefits over a long period of time.’*

Furthermore, responses argued that land managers are integral to the sustainable management of the natural environment and so should be rewarded, particularly those with “additional contributions to public goods such as biodiversity enhancement, flood mitigation, water quality improvement, water table stabilisation, public amenity etc.” (Responses from Rewilding Britain).

Some concerns have been raised over the potential mis-interpretation of ‘Public good’, suggesting that it should not be a narrowly defined objective and should be focused on rewarding beneficial environmental outcomes from activities. Further concerns were expressed that the lack of precision of certain phrasing could lead to exploitation: *‘We think that ELMS should primarily be about financing the management of land for public benefit. We are concerned that using the phraseology of creating an “income stream” for farmers could give the wrong impression of the fundamental spirit of “public money for public goods” and may lead to exploitation of the scheme.’*

Harness local knowledge and engage local stakeholders to meet objectives.

Responses from Rewilding Britain suggest that to reach the objectives, certain actions must be taken. For example, they argue that initiatives must be guided by local leadership, using credible and non-bureaucratic ways to measure the outcomes for communities and the environment.

Encouraging participation

Q8. What is the best way to encourage participation in ELM? What are the key barriers to participation, and how do we tackle them?

The majority of responses to this question were adapted from the Rewilding Britain proposed responses and therefore there was limited diversity in opinions.

Barrier 1: Lack of sustainability focused initiatives and information and support for those interested in Rewilding projects

Rewilding Britain have responded stating that they are receiving increasing amounts of landowners showing interest in sustainable land-use practices such as rewilding: *'There are a growing number of landowners interested in rewilding'*.

Proposed solutions:

- They suggested that as landowners are likely to rely on the ELM scheme for support with diversification and restoration, there is a need for greater advice on: restoration activities to restore natural processes; production systems that work with natural processes; nature-based enterprise support; and establishing collaborative initiatives across multiple landholdings.”
- Other suggestions include training *'to be run by people with a real passion for achieving positive outcomes for the environment'* to ensure sustainability focus.

Barrier 2: Need for reliable financial support guaranteed to landowners to improve engagement levels

Land restoration is argued to be costly and require significant investment. Without reliable financial support, farmers may be more likely to adopt unsustainable practices in favour of cost reductions

Proposed solution:

No specific solution proposed.

Barrier 3: Reluctance to adopt new, unfamiliar practices demands the provision of expert advice, specific to local needs

A large shift in mindset has been identified as a requirement to encourage uptake of new practices away from current 'detrimental' practices. Others state that lack of knowledge and perceived difficulty of implementation is the biggest barrier and suggest that any proposal must be relatively easy to implement to avoid low levels of confidence in success

Proposed Solution:

- Suggestions included to “incentivize collaborative approaches between stakeholders” this was argued to encourage community engagement and develop support networks and culture of sustainable farming practices.

Barrier 4: Levels of accessibility and engagement with both landowners and the public

Concern was expressed that not all would be able to access resources to engage fully with the ELM, such as smaller landowners.

Proposed Solution:

- Ensuring that landowners are involved in all conversations is critical and ensuring access to any materials/documents
- Good quality research needs to be funded and published and disseminated amongst the farming community, both to spread awareness of good practice and to draw attention to the effects of poor practice

Tier activities

Q9. For each tier we have given a broad indication of what types of activities could be paid for. Are we focusing on the right types of activity in each tier?

The majority of responses were copied from the suggested responses provided by Rewilding Britain.

Tier 1:

- Concerns raised that activities in tier 1 could be interpreted as 'business as usual', similar to the Basic Payments System. Rewilding Britain are of the opinion that activities must be clearly defined and obviously targeted at genuinely environmentally beneficial activities, furthermore that farmers must not be rewarded for *'simply avoiding bad practices'*
- Collaborative approaches were suggested as approaches that should be encouraged for multiple beneficial outcomes and that *'payments would need to be structured to ensure value through 'net gain' strategies in which farmers, for example, would be encouraged to push on beyond existing practice'*, this would be in an attempt to avoid the 'business as usual' scenario.

Tier 2:

- The general consensus from respondents was that tier 2 focused on appropriate activities and has a good emphasis on the importance of tailoring to local needs
- Suggestions for improvement included greater emphasis on connecting activities such as *'low-impact mixed forestry, harvesting of natural products, and extensive meat production to create a "mosaic" of functions in any particular area.'*

Tier 3:

Most respondents argued that tier 3 had the greatest opportunities for improvement and severely lacked in certain areas. Many argued that tier 3 needs to be more specific and incorporate rewilding as a key activity. Suggestions include shifting from tree-planting and specific restoration projects towards incentivizing rewilding, which is argued to be more effective and adopts a systems approach. Rewilding Britain responses suggest that as

rewilding involves multiple interventions, there will be improved efficiencies, multiple benefits and public goods delivered *'at scale for the greater good of society as a whole'*.

Many respondents supported this idea and suggested that connecting activities and creating mosaic areas would help to create *'opportunity for creating attractive nature-based tourism activities such as glamping, camping and safaris – as well as sustainable consumable products – from the range of habitats created.'*, this was argued to potentially reduce the dependencies on EMS-type payments and subsidies which improves future sustainability of the scheme.

Concern was expressed that the term 'afforestation' may allow for monoculture plantations which do not provide high value environments for wildlife. Instead, they suggest that land must be allowed to regenerate naturally and that large-scale afforestation should be encouraged more in areas of low agricultural value to preserve productive arable land

Collaboration

Q10. 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?

Once again, the majority of responses followed the same format as those suggested by Rewilding Britain, leading to limited diversity in responses.

Key suggestions:

- **Locally led entities and partnerships** to determine the best approach and to coordinate actions across multiple landholdings. Partnerships were argued to provide support to local stakeholders and to develop greater bargaining power. Furthermore, a collaborative approach would support initiatives which require large amounts of land and communication across landowners, for example it was mentioned that the *'establishment of wildlife corridors will be enormous help to wildlife but requires collaborative working between landowners to achieve outcomes'*
- **High quality advisory support** was suggested as a way to help develop skills and ensure the successful implementation of alternative initiatives linked to rewilding: *'includes creating a network of community-based trusted land-based business advisors to help with skills, training and business development support to implement new nature-based enterprises and forms of production linked to rewilding'*
- **Financial Support:** many responses mentioned the demand for financial support for high up-front costs and long-term paybacks for investing

Local priorities

Q11. 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?

The majority of responses used the Rewilding Britain response so the diversity in responses was minimal. Many also did not answer this question or stated that their responses to the previous question answered this one.

Local decision-making is intrinsic to determining local priorities.

Rewilding Britain suggest that local stakeholders must be involved in the decision-making processes to: *'determine the best approach and to coordinate actions across multiple landholdings'*. Responses put across the view point that determining priorities at a local scale will be most effective due to harnessing local knowledge and the ability to determine risks and outcomes. Local partnerships are mentioned frequently as a method of deciding priorities and ensuring diverse viewpoints to cover multiple bases. However some concern has been expressed that partnerships must be representative and enable all types of stakeholders to contribute:

'It needs to be ensured that all parties are heard and that undue deference is not given to those who may consider themselves traditionally "in charge"'

'You will need diverse stakeholder groups to make such decisions. They should be autonomous and not dominated by any one group that has vested interests, bias, undue influence, or ulterior motives'

Support must be provided to national agencies to ensure effective interventions

Rewilding Britain call for ensuring that statutory agencies, such as the EA, are adequately resourced to provide comprehensive opportunity mapping for the public goods within their remit. Respondents argue that national agencies can support local communities and provide skills and training: *'Local assessment and response will be essential but should also be supported by well-funded, well-resourced and fast acting national agencies like the Environment Agency. This would enable localised understanding supported by a broader overview rather than an isolated approach.'*

Adopt a systems-thinking approach.

Many responses identified that viewing issues in isolation will not deliver desired outcomes due to the interconnectedness of environmental challenges. Rewilding Britain suggest that priorities must be determined at a wider catchment scale to best assess and tackle "the

critical public goods of reduced flood risk, improved water quality and greater drought resilience”

Problem-shifting was mentioned to occur when issues are viewed in isolation. Respondents suggest that problem-shifting should be avoided by understanding the wider problem and developing partnerships or networks: *‘With oversight and targeted prioritization, catchments at threat could be protected and enhanced within a larger remit; those local improvements could form part of a symbiotic network between catchments and communities to the benefit of all and potentially reduce costs by addressing need as part of a wider picture.’*

Payment rates

Q12. What is the best method for calculating payments rates for each tier, taking into account the need to balance delivering value for money, providing a fair payment to land managers, and maximising environmental benefit?

Many either left this question blank or expressed that they felt they lacked the expertise to adequately respond to this question. Many others fully endorsed the Rewilding Britain response.

Ecosystem Service Valuation based on environmental and public goods delivered:

Rewilding Britain suggest the use of *‘proxy measurements for the natural capital value per hectare of delivering certain public goods’*. This type of ecosystem service valuation is mentioned frequently in the responses as a method to determine the level of pay which landowners will receive.

Some suggest higher payments could be provided to landowners whose activities provide more than one environmental benefit.

Public Spending for Public Goods:

Rewilding Britain suggest that enhanced payments should be provided to those making *‘additional contributions to public goods such as flood mitigation, water quality improvement, water table stabilisation, public amenity value and so on’*. Other responses are similar to this viewpoint that the provision of public goods should be incentivized: *‘Payments must try, as often as possible, to increase substantially in relation to public access and enjoyment.’*

Use of satellite imagery.

Rewilding Britain, and all those that endorse them, suggest that satellite imagery should be used to monitor outcomes: to use satellite imagery, backed up by targeted risk-based auditing, to verify the outcomes.

Maintain simplicity for ease of use and accessibility.

Many endorsed the Rewilding Britain argument that '*Simplicity is key: bureaucracy and over-complication is one of the main reasons the CAP Pillar II (environmental) schemes were poorly utilised and unpopular among farmers.*' Other respondents support this concept and argue that maintaining simplicity will encourage participation and increase the accessibility of the scheme.

Rewilding Britain 2019 Rewilding and Climate Breakdown Report proposal of a payment model.

Responses from Rewilding Britain and its supporters suggest that the payment model proposed in their Rewilding and Climate Breakdown Report 2019 should be applied and that figures within the report provide '*a good evidence-based steer on the level of payments for each ecosystem type based on carbon sequestration values*'.

Tier 1 specific

Responses suggested the opinion that tier 1 payments should be lower due to limited contribution to public goods. Furthermore, the ability to potentially generate profit from activities in tier 1 meant that some argued that payments should be lower than those taking more risks with less financial reward in other tiers: '*tier 3 applicants should receive the highest payments per hectare as it's my belief that they would be delivering the most needed public goods and not receiving typical profits generated by tier 1 land owners*'.

Tier 3 specific

The consensus was that greater payment should be provided to those participating in tier 3 activities. Rewilding Britain responses state that those participating in tier 3 '*should receive the highest payments per hectare because they will be delivering public goods at a significant and measurable scale*'.

Further insights include that payments for activities in this tier should be dependent on type of project: '*payments should be negotiated on the project-by-project basis*'. This was supported by responses from Rewilding Britain which argued that projects in tier 3 are '*delivering public goods at a significant and measurable scale*'.

Private finance

Q13. To what extent might there be opportunities to blend public with private finance for each of the 3 tiers?

Many left this question blank, and some stated they did not feel they had sufficient information to respond. Most responses endorsed the Rewilding Britain response.

Tier 1 unlikely to attract private funding

Those endorsing the Rewilding Britain viewpoint argue that activities in tier 1 present difficulties in proving the delivery of public goods and are therefore unlikely to gain private investment.

Excellent opportunities within Tiers 2 and 3

Argued by respondents as due to the delivery of large-scale public goods and being relatively easy to demonstrate the economic benefits. Responses suggest that private investors such as water companies will be able to demonstrate the delivery of multiple benefits and have a vested interest in environmental schemes: *'Many types of business have an existing interest - water and electricity companies and various industries which could all use their investment power alongside local enterprises and cooperate with improvements'*

Mandatory carbon-pricing mechanisms should be established

Those endorsing Rewilding Britain argue that carbon-pricing mechanisms should be made mandatory and this would encourage greater private investment into natural climate solutions such as activities within tier 3: *'there should be establishment of a mandatory, economy wide carbon-pricing mechanism, linked to carbon emissions, to raise additional dedicated revenue to fund natural climate solutions.'*

Establish local approaches.

Responses suggest that since there is greater support for improved environmental outcomes, there are opportunities for businesses to invest in improving local environmental conditions to also improve their customer satisfaction: *'With the public appetite for a greener and more responsible economy, companies should be expected to mitigate their carbon emissions through environmental investment.'* Rewilding Britain suggest that developing Local Enterprise Networks could be useful as a way of establishing, managing and marketing regional supply chains where these can drive specific landscape restoration outcomes. This argument indicates that there are mutual interests in environmental activities and that outcomes could produce both environmental and financial benefits.

Advice

Q14. 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?

Most responses came from the Rewilding Britain organisations recommended responses to the survey, with little diversity in responses.

Is advice needed?

The overriding message from these responses is that advice is always essential and networks should be established which include community based, trusted, expert co-ordinators whose role it is to coach, inspire, enthuse, educate, hand-hold, form-fill and connect-up farmers through the transition process. Generally, these responses argued that specific rewilding support and guidance is also required, without which *‘the scheme will fail because landowners will become disillusioned (as they have done with stewardship), compliance will suffer, and public money will be wasted.’*

When is advice needed?

Advice needs to be readily available at most times throughout the process. Consistency in advisors was mentioned as an important factor to ensure trust and relationships are developed: *‘Ideally the same advisor would build a relationship with the landowner and work with them from the start’.*

In what ways should advice be given?

- **By trained advisors:** many believed that it is essential that advisors are trained in a range of skills including: ecological restoration, natural flood management and nature-based business development. To ensure the successful integration of rewilding into practices, “trusted local experts” are essential as they can generate confidence and assure landowners of best practices.
- **By those with local knowledge and experience:** many supported the idea that advisors should have experience with the local area to be able to provide suitable suggestions and support.
- **By those who are open-minded and aware of modern land management approaches:** the responses argue that advisors must be open to learning new farming practices, sharing knowledge and be able to deliver beneficial environmental outcomes: *‘Networks that share open knowledge must be retained and encouraged, with open minded approaches to modern land management’*

Self-assessment

Q15. 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 35 imagery and site visits we deploy. How might self-assessment work? What methods or tools, for example photographs, might be used to enable an agreement holder to be able to demonstrate that they're doing what they signed up to do?

Most responses came from the Rewilding Britain organisations recommended responses to the survey, with little diversity in responses. Some respondents left this question blank.

Generally, responses indicated that a combination of self-assessment and agency-based monitoring methods should be adopted. Overall, technology was a key factor and identified as a must to make use of and develop more efficient monitoring methods.

- Respondents argued that technology must be used and developed to avoid expensive visits, increase efficiency and make use of newest technological advancements: *'Apps should be developed to allow the landholders to easily report their projects development'*
- Satellite imagery and available technology must be utilized to ensure that landowners are complying.
- Instead of conducting site visits and field monitoring, Rewilding Britain and their supporters suggest that focus should be placed on generating evidence from *'satellite imagery, specific incidents (pollution, for example) or whistle-blowing by neighbours or the general public'* to ensure no agreements are being breached
- Responses suggest that advisors could be used for verifying the evidence provided by landowners
- Rewilding Britain suggest that fixed-point photography, drone footage should be conducted by landowners to demonstrate the progress in activities
- Many responses mention that trust is required to be placed on the landowners, but that particularly in the initial stages, the advisors will be essential to ensure expectations are fulfilled: *'the advisor role is so important...the same person should provide the advice wherever possible, to maintain that trusted relationship. Once trust is created, self-assessment may well be possible, but it is for the advisor to make that judgement'*

National pilot

Q16. 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?

Some left this question blank. The majority endorsed the Rewilding Britain response.

Independent specialists required.

The main message from the responses, and particularly those from Rewilding Britain, is that independent specialists (non-Defra family) must be brought in as *'Defra and its agencies do not have the full range of expertise and skills to cover all aspects of the scheme's design and evaluation'*. The responses suggest that independent specialists brought in should come from organisations such as: RSPB, National Trust, Rewilding Britain, Permaculture Association, Soil Association, Friends of the Earth, Greenpeace and wildlife trusts

Incorporate Rewilding into the national pilot.

Rewilding Britain suggests that rewilding specialists would be required and advisors which focus on nature-based business: *'Rewilding specialists, nature-based business advisors should be included if we are to bring scale, ambition and connectivity to existing efforts.'*

Include increasing public/local engagement in the National Pilot

Arguments supporting this include that increasing public awareness of activities will help develop networks, and also provide farmers with greater understanding of public desires: *'Farmers need to be aware that priorities are changing in the diets of the general public... the public needs to be aware of the pressures on farming and the opportunities this raises to alleviate them'*. Additionally, stakeholder engagement is argued to be important at this stage to ensure communication and expectations are met: should also include some degree of local input to ensure that the original stakeholders agreed vision for the schemes are being achieved.

Appendix 2: Regional analysis

Profiling

Citizen Space responses

The regional analysis includes the 1,114 responses submitted within the Citizen Space platform (and does not include the paper/email submissions). The counts of responses included in the regional analysis is detailed below:

	Total (% of total)	Land Managers		Non-land managers	
		N	%	N	%
North West	106 (10%)	60	57%	46	43%
North East	67 (6%)	50	74%	17	
Yorks & Humber	136 (12%)	92	68%	44	32%
West Midlands	107 (10%)	72	67%	35	33%
East Midlands	112 (10%)	76	68%	36	32%
East of England	143 (13%)	103	72%	40	28%
South West	275 (25%)	180	65%	86	35%
South East	168 (15%)	86	51%	82	49%

- Of the regions included in the analysis, we note that there were varied number of responses per region, with South West by some margin the biggest, and North East the smallest
- Most regions have a similar profile in terms of the proportion of land managers, although we note that East and North East have slightly more bias to land managers, and South East is slightly more skewed to non-land managers.
- Responses classified as 'London', 'Remote' and 'Blank' have been excluded from the analysis as each of these categories contained relatively few responses (under 40 each) and were strongly oriented to non-land managers

Findings of regional analysis by question

(Note that those points in **bold** indicate more significant variations. The others are all directional / indicative only.)

Q6. Do you have any comments on the design principles on page 14? Are they the right ones? Are any missing?

No regions are dramatically different in their views of the design principles, although there is some variation.

Sentiment by region

- Respondents in the North East, East Midlands and East of England are slightly more positive than average about the design principles
- Yorkshire and The Humber, and the South West are a little less positive than average

Themes by region

- North East – indicatively slightly more mention of reward mechanisms
- North West – slightly more likely than average to call for greater ambition; also a little more emphasis on prioritising advice

Q7. Do you think the ELM scheme as currently proposed will deliver each of the objectives on page 8?

No regions are dramatically different overall in their views on ELM delivering its objectives, although there are some themes which are slightly more prominent in certain regions.

Sentiment by region

- Respondents in the North West exhibit a little more uncertainty / more caveats around their view on whether ELM will deliver objectives.
- South West is the region most likely to say ELM will *not* achieve the objectives

Themes by region

- North West – more likely to say that there's a **lack of detail**, and (as for Q6) that there's a lack of ambition
- Yorkshire and The Humber – slightly more comment than average that there's a lack of detail and the objectives are short term; also slightly more mention that the scheme needs to ensure profit and be sufficient to replace BPS
- East Midlands – a little more mention of the need for sufficient funding
- East – more emphasis on the need for **simplicity** (simple processes, minimising admin) than other regions
- South East – slightly more mention than average of rewilding
- South West - more mention of specific issues than other regions – notably related to water quality

Q8. What is the best way to encourage participation in ELM? What are the key barriers to participation, and how do we tackle them?

No major differentiating themes between regions in response to this question, but some slight variation in emphasis:

- North West – more likely than average to say that **advice** is needed to encourage participation. Also a little more likely to mention a barrier being that ELM is hard to understand / complex

- West Midlands – indications that here there is a little more demand for good payment systems
- East Midlands – more likely to mention making it **easy to understand and apply** than other regions
- East of England – more likely to cite **good payment systems** and the need to **be supportive and build trust**. Also slightly more mention of needing achievable targets and providing flexibility as the scheme goes on

Q9. 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?

Generally consistent sentiment and comments across the regions, with only a few minor variations.

Sentiment by region

- North East – indicatively slightly more positive than average
- Yorkshire and The Humber – The most negative of all regions in sentiment to what's included in the Tiers – with c. one in four saying they do not think the proposals focus on the right activities

Themes by region

- North East – a little more comment on inclusivity in response to this question
- Yorkshire and The Humber – slightly more mentions than average of hedgerows as a specific issue
- East Midlands – slightly more focus on Tier 3 activity in the responses

Q10. 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?

The response across the different regions is generally a similar mix of thoughts, with just a few slight differences in emphasis:

- North West – slightly more endorsement of the need for support and facilitation of land managers working together
- North East – more emphasis in this region on **involving farmers and building trust**
- East Midlands – slightly more mention of ways of incentivising to collaborate
- East of England – a little more focus on having advisers with local knowledge

Q11. 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?

There are no really notable differences in response by region, with just a few indications of some slight variation:

- North West - A little more likely to want to take account of regional and national priorities – not just local
- East Midlands – slightly more general support of determining at a local level
- East of England – a little more mention of the involvement of local and regional stakeholders, as well as slightly more looking for oversight by a broader body

Q12. What is the best method for calculating payments rates for each tier, taking into account the need to balance delivering value for money, providing a fair payment to land managers, and maximising environmental benefit?

Only minor variations in the response to this question noted for two of the regions:

- East of England – A larger volume of comments in response to this particular question than in other regions – suggesting greater engagement with this issue of payment mechanisms. However, there are a range of thoughts with no clear consensus on the best method(s) for calculating payments.
- North West – Slightly more opposed to (just) income foregone than other regions

Q13. To what extent might there be opportunities to blend public with private finance for each of the 3 tiers?

Some variation in strength of positivity towards blended finance by region, although all are, on balance, positive towards the idea.

Sentiment by region

- Yorkshire and The Humber, and the North West are a little more positive than average about the opportunities for blended finance
- In the West Midlands sentiment towards the idea is least positive (but still on balance in favour)

Themes by region

- East of England – A higher proportion mention **carbon offsetting** than in other regions

- North West – while this is one of the more positive regions when it comes to blending public with private finance, there are also signs of slightly more anxiety / ‘watch outs’ about applying private finance (e.g. that it should not replace public funding)

Q14. 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?

In all regions, the clear majority think advice is necessary – with little variation in the strength of endorsement. No notable differences by region in themes regarding advice.

Sentiment by region

- East of England - more say that advice is *not* always necessary (close to 1 in 4).

Themes by region

- East of England – slightly more mention the need for ongoing advice in implementing schemes
- Yorkshire and The Humber - a little more likely to talk about the need for advice on more complex schemes

Q15. 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 35 imagery and site visits we deploy. How might self-assessment work? What methods or tools, for example photographs, might be used to enable an agreement holder to be able to demonstrate that they’re doing what they signed up to do?

Very little regional variation in response by region, with just two observations emerging from the regional analysis:

Sentiment by region

- Yorkshire and The Humber – the most positive towards self-assessment (where over 3 in 4 support it without any caveats)

Themes by region

- North West – indications that here there may be more call for advice / use of advisors in assessment and monitoring than in other regions

**Q16. 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?**

Relatively little variation in level of agreement with the proposed pilot approach by region. There was also little regional variation by region in what was said about the pilot approach, with just one minor point from the analysis:

Sentiment by region

No notable differences by region; in all regions around half did not give a clear view specifically on whether they support the *proposed* pilot.

Themes by region

North West - Indicatively a little more emphasis on piloting ease of application and submission

Appendix 3: Pre-Post COVID-19 pause Analysis

The PDD was initially launched on Citizen Space on 25th February 2020 but was subsequently paused on 8th April 2020 due to the unfolding situation with COVID-19. The discussion was re-opened on 25th June 2020 with a revised closing date of 31st July 2020. This chapter summarises the findings from an analysis of the differences between the Citizen Space responses pre and post the pause to the discussion due to COVID-19.

- There was a much smaller number of responses before the pause due to COVID19 (243) than post the COVID-19 pause (954)
- The balance of land managers and non-land managers is reasonably similar for each tranche, meaning that 'pre' and 'post' responses are reasonably comparable
- Generally there were slightly more comments coded in the post COVID-19 pause responses – post the pause due to COVID-19 responses were slightly more thorough, with a slightly wider range of comments than before the pause

Q6 Do you have any comments on the design principles on page 14? Are they the right ones? Are any missing?

Pre to post the COVID-19 pause does not see any clear shifts in sentiment to or the nature of comments around the design principles, although there are some slight directional differences:

- Post the COVID-19 pause, the balance of sentiment towards the design principles is *slightly* more positive, as slightly fewer express caveats to their support
- There were a handful of comments post the COVID-19 pause specifically referencing heightened need for food security, for example:

'Food Security must be a public good especially given COVID-19' **Individual, South West**

'...for farms to be truly sustainable they must also be financially successful; this is all the more important at a time when there is a renewed focus on food security following the COVID-19 pandemic' **Farmer, Yorkshire and Humber**

'However, with the current COVID 19 outbreak the need to ensure that environmental objectives are not achieved by reducing the levels of domestic food production has never been more relevant' **Local Authority**

- However, overall there was only a mild increase in mentions of food production – not a really significant shift in light of COVID-19
- Additionally, post the COVID-19 pause, there was a little bit more mention of the themes of **inclusivity** and slightly more comment around provision of **flexibility / options** – but neither of these changes were of a magnitude to be regarded as really significant.

Q7. Do you think the ELM scheme as currently proposed will deliver each of the objectives on page 8?

Sentiment: Post the COVID-19 pause, slightly more responses express caveats over whether objectives will be achieved, but the overall balance of sentiment is the same.

As at question 6, we note a small number of comments at question 7 that explicitly bring in COVID-19 as a reason to be more concerned about food security e.g.

'Food production vital in light of COVID-19' **Famer, West Midlands**

But while COVID-19 may raise food production up the agenda for some individuals, these are few and far between. There are not widespread calls for greater consideration of this issue in the proposals post the COVID-19 pause.

In terms of the nature of other comments around whether ELM will deliver on its objectives, post the COVID-19 pause, there are no major shifts in what respondents are saying, although there are indications of slightly more feeling that the **PDD lacks detail**.

Q8. What is the best way to encourage participation in ELM? What are the key barriers to participation, and how do we tackle them?

There are no really significant changes in the complexion of responses from pre to post the COVID-19 pause, although two themes emerge slightly more in the second phase of the discussion:

- Post pause – slightly more responses are emphasising **inclusivity**, although this is only directional and does not make a fundamental difference to the prominence of this theme in encouraging participation.
- Also signs of a slight increase in comments around **payment and financial impact** – but this is not especially marked overall.

Q9. 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?

- **Sentiment:** On balance no real differences in sentiment pre to post the COVID-19 pause
- There were no changes in feedback noted for this question pre to post the pause

Q10. 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?

There were no real changes in the nature of what respondents said in the post COVID-19 pause phase of the discussion, although there's evidence of a slightly greater volume of

comments endorsing the **general need to be actively supportive** of land managers working together.

Q11. 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?

Post the COVID-19 pause – there are indications of slightly greater advocacy of consulting with / involving **local people** / communities (and also other local stakeholders)

There's also directional evidence of a little more mention of the specific issue of **public access**, supported by a number of direct references to COVID-19:

'During COVID lockdown there has been an obvious benefit to rural wildlife through a lack of disturbance. Fundamental to increases in breeding numbers of many species of visible mammals and birds is the realisation that we must not spoil that which we wish to preserve- this is particularly relevant to access.' **Land Manager, South West**

'I don't think many farmers are willing to give more access unless it's part of their business model, especially since COVID.' **Land Manager, South West**

'Public access has been very difficult during the COVID 19 outbreak with mass trespass, misuse of existing PROW and widespread fly tipping.' **Land Manager, South East**

'Permanent 'anytime' access to both small and large areas is undesirable and will always change the biodiversity, in numbers of species, animal behaviour, etc. This has been evidenced by the COVID-19 lockdown.' **Land Manager, South East**

Q12. What is the best method for calculating payments rates for each tier, taking into account the need to balance delivering value for money, providing a fair payment to land managers, and maximising environmental benefit?

Post the COVID-19 pause, we see evidence of more respondents wanting to **go beyond income foregone**. While this is not directly expressed in the responses, we suggest this may be an effect of heightened concerns around economic uncertainty.

Q13. To what extent might there be opportunities to blend public with private finance for each of the 3 tiers?

Sentiment: Similar in both the pre and post COVID-19 pause phases of the discussion.

There were also no notable shifts in feedback pre to post, although we do see a handful of direct mentions that private finance may be less forthcoming / more unpredictable in light of COVID:

'I expect this has become more difficult post COVID-19 as neither the government or industry has any money left. I doubt the airlines will foot the bill for this!' **Land manager, South West**

'Given the effect of COVID-19 on commerce, I am not sure this is known.' **Other stakeholder, South West**

Q14.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?

Sentiment on the need for advice is similar at both pre and post COVID-19 pause phases of the discussion. Post the COVID-19 pause we note a little more focus on comments re: advice needed **at initial set up / start** phase of ELM, otherwise there are no signs of any changes in what respondents are mentioning.

Q15.We do not want the monitoring of ELM agreements to feel burdensome to land managers, but we will need some information that shows what's being done in fulfilling the ELM agreement. This would build on any remote sensing, satellite imagery and site visits we deploy. How might self-assessment work? What methods or tools, for example photographs, might be used to enable an agreement holder to be able to demonstrate that they're doing what they signed up to do?

Sentiment: Post the COVID-19 pause there is a slight uplift in outright positivity towards self-assessment (without caveats)

There are no significant changes in the nature of what people say about self-assessment post the COVID-19 pause, although there are indications of slightly more desire to involve advisers / having a human touch to assist.

There are also a handful of anecdotal mentions of how COVID-19 may have assisted farmers' familiarity with / use of 'remote' communication e.g. farmers showing in the pandemic that they can manage inspections via WhatsApp, and increased familiarity with video conferencing making it an option to 'meet' agreement holders on a more regular basis.

Q16.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?

Post the COVID-19 pause there is no major change of endorsement of the pilot approach and no notable shifts in what is being said about piloting.

Appendix 4: Key Stakeholder organisations

Where the report refers to Key Stakeholders this relates to submissions from representatives of the following organisations (except where they have asked to remain confidential):

Farming

- Tenant Farmer Association (TFA)
- National Farmers' Union (NFU)
- The Central Association Of Agricultural Valuers (CAAV)
- Country Land and Business Association Limited (CLA)
- Commons/Uplands Alliance
- Land Workers Alliance
- National Sheep Association
- Agriculture and Horticulture Development Board (AHDB)

Environmental

- RSPB
- Wildlife Trusts
- Sustain
- Wildlife and countryside link

Organics

- Soil Association
- English Organic Forum and Organic Farmers & Growers

Other

- Campaign to Protect Rural England
- Linking Environment and Farming (LEAF)
- National Trust
- Local Government Association
- Farming and Wildlife Advisory Group (FWAG)
- Areas of Outstanding Natural Beauty (AONBs)
- National Park Association (NPA) or individual national parks
- Forestry Commission (FC)
- Rural Payments Agency (RPA)
- Natural England (NE)

Forestry

- Confor
- Woodland Trust
- Institute of Chartered Foresters

Heritage

- Heritage Alliance

Appendix 5: Methodology

Stakeholders were invited to respond to 11 open-text questions posed in the PDD. A total of 1,672 submissions to the discussion were received as outlined in the table below.

Submission type	Number
Citizen Space	1,379
Email	282
Paper/mail	11
Total	1,672

An initial data review and cleaning exercise was conducted during which:

- 39 responses were removed from the analysis (duplicates, empty responses, or irrelevant responses);
- 10 responses were identified as part of the Horse Access campaign to be analysed separately (their views are represented in the section on Public Access and Rights of Way);
- 209 responses were identified as part of the Rewilding Britain campaign (these have been analysed separately and a summary of the responses are included in Appendix 1);
- The data from all email and paper submissions which followed the 11 open-ended question structure were transposed into the same database as the Citizen Space submissions in order for them to be analysed as a single data set
- All submissions were profiled in terms of the type of stakeholder and region were possible from the information provided.

A qualitative thematic coding approach was taken to analyse the large and disparate volume of responses. Central to this is was developing a codeframe (a list of themes and sub themes) by which we could categories each response in order to structure the 'free form' responses and draw conclusions about the range and weight of responses and how they differed between stakeholder groups. Although this is primarily a qualitative analysis the structured coding approach enables a degree of quantification in terms of providing an indication of the proportions of submissions addressing some of the major themes. However, since this was not quantitative research exercise these proportions are not statistically robust and should be treated as indicative.

A codeframe was developed for each of the 11 PDD questions using an iterative approach:

- A cross section of 66 responses (in terms of stakeholder type, region and time of responses) were initially reviewed from which between 15 and 30 themes were identified for each question.
- The initial code frame was 'stress-tested' as the main coding process began with further themes and sub-themes added to the code-frame
- After the coding of 430 responses the code-frame was thoroughly reviewed and amended to reflect new themes/sub-themes arising from the data.

The code frame was designed so that:

- Multiple coding per question was allowed, to capture more than one theme arising within a response
- Where appropriate the overall sentiment to the question was captured e.g. support for the principles
- A multi-level approach was taken to capture all comments relating to a specific theme in addition to 'sub-codes' to capture further detail
- Verbatim comments could be identified for each response in order to develop a full description of each theme and illuminate the report with real voices

Once coding of all the structured responses was complete counts of all the themes and sub-themes for each question were run to provide the basis of the analysis. All unstructured submissions which did not follow the format of the 11 questions in the PDD and longer submissions which could not be adequately captured via the code-frame were reviewed against the final analysis to identify similarities or differences in the response from the main body of submissions.