



Environmental Land Management: Consultation Questions

Forest of Selwood CIC response

The Forest of Selwood (FoS) is a deeply historic landscape on the eastern edge of Somerset which has been a recognisable, legal and physical entity since at least early Anglo-Saxon times. Within its borders there are the towns of Frome and Bruton and the headwaters of four significant rivers – the Brue, Frome, Stour and Wylfe. For over a millennium the Forest of Selwood has been shaped by its people, trees and wildlife.

Forest of Selwood CIC warmly welcomes the Environmental Land Management Scheme as a way of helping us incentivise the delivery of our vision for our area.

The Forest of Selwood Community Interest Company comprises of local people, land managers and organisations as well as knowledgeable advisors committed to a better future for this special area. We want to collaborate with others that share our vision, our aims are:

- To revive and enhance wildlife. The FoS is rich in nature – flower rich meadows, ancient and other veteran trees in ancient wood pastures, parkland and hedgerows as well as ancient woodland. The vision is for a wilder connected landscape of increasingly species rich habitats. The aim is also for wilder corridors along river banks to slow the flow, improved soils, air and water quality and for the landscape to store significant carbon.
- To slow climate change. The aim is to change carbon intensive farming to a mix of regenerative agriculture, conventional conservation and rewilding.
- To connect people with a distinct and dynamic landscape which gives them a sense of identity with the land. The aim is to promote and champion natural beauty and cultural capital so that it is a more resilient place to live in the future.

Forest of Selwood CIC has worked with FWAG SW to develop a Facilitation Fund Group which is already providing opportunities for land-managers within the area to come together to discuss how in cooperation we can deliver our aims with and for the benefit of the whole community.

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

ELM provides us with a once in a generation opportunity to protect and enhance keystone landscape features, remnant habitats and to restore, buffer and extend priority habitats and historic landscapes within the Forest of Selwood for multi-purpose outcomes which are recognised as representing public good.

FoS CIC is very keen that ELMS should work at every level/tier across the area and that wherever possible every habitat is retained and enhanced and that greater connectivity can be achieved through a mix of conventional conservation management, regenerative agriculture and rewilding. The consultation document frequently refers to farmers and while they are important, within the FoS there are also landowners who do not rely on farming enterprises as well as land owned and run by community groups or NGOs. We will therefore refer to land-managers in our response as a generic term rather than farmers alone.

We are especially keen that established open-grown trees and shrubs outside woodlands (TOWs) are cared for and retained and should form a part of every scheme for all land-managers receiving public payments. In the past and in current schemes, important trees in pasture and arable or in boundaries have not been adequately protected by existing mechanisms including cross compliance and GAEC. Their buffer or root protection areas have routinely been compromised by agricultural practises resulting in deterioration and loss.

As part of the work of FoS CIC we have started to develop a map of the key habitats and to undertake opportunity mapping. We hope that ELMS can be designed to facilitate local communities to identify and map what is important and work with land-managers to find innovative ways to work together to enhance the landscape.

In delivering ELMS it is essential that suitably trained staff, who are engaged to deliver the scheme, work closely with land-managers, communities and individuals to build on their knowledge and help deliver our vision for this landscape at individual landholding to catchments upto Forest landscape scale.

A lesson learnt from previous schemes is that land-managers and community groups 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 land-managers and their communities 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.

In an ancient tree rich heritage landscape such as Forest of Selwood, there should be exceptional incentives for replacement of open-grown trees and shrubs which can become the ancient trees of the future and provide

continuity of their landscape, heritage, culture and biodiversity benefits long into the future. It will be necessary to adequately incentivise the planting & protecting of 'in field trees' especially in arable fields and from livestock in pasture. There will also need to be appropriate incentives for restoration, buffering and extending of wood pastures and parkland.

All too often tree planting targets are just a numbers game. Grant aid requires planting over 1000 trees per ha (sometimes 2000 trees per ha) to meet timber production objectives but the majority of these trees will be thinned out in forestry systems to leave 100 trees per ha at final crop after as little as 60-70 years. Such planting schemes consume energy and single use plastic and create carbon dioxide. The Forest of Selwood is not committed to plantation planting that is likely to result in high numbers of low-quality trees. We want to see every tree count towards our clear outcomes and therefore diversity in grant aiding tree establishment at lower numbers but for long term retention.

FoS also plays an important role in the headwaters of four important river catchments, each of which has significant impacts on it's distant flood plain. It is not ideal for the individual catchment partnerships to work in isolation in our area. There should be scope for greater collaboration beyond geophysical boundaries between multiple agencies, river trusts and communities. In particular there needs to be a coordinated response to the design of schemes including local participation.

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

Forest of Selwood CIC is keen to see ELMS deliver for land-managers and the community as well. We want to be sure that the whole community can see public money being used for their benefit in a measurable and visible way. We want to see the results from the changes in the headwaters of the four rivers translated downstream through natural flood management.

FoS believes that for our area it will be necessary to think about the Levels / Tiers in an integrated way so they work geographically and vertically together. Our vision can only be delivered through careful and intensive planning and engagement of land-managers and residents across the area. This process of engagement with individual land-managers, joint working between land-managers and communication with the wider community will need support if we are to achieve success.

Collaboration between land managers will result in better networks and larger landscape scale. Additionally working with a whole land holding approach, the benefits of both should be reflected in the levels of funding.

We would like to see options for extensive wood pasture and parkland, flower rich grassland, hedgerows and rewilding promoted in Tier 3 as they provide significant natural process led approaches through grazing by large herbivores.

ELM should not be about creating an “income stream” for land-managers or foresters. This phraseology gives the wrong impression of the fundamental spirit of “public money for public goods” and could lead to exploitation of the scheme. It is about financing the management of land for public benefit.

With regard to objective two, we agree with the approach to enforcement within ELM should be proportionate generally but when there is blatant and repeated disregard for regulations, particularly for example pollution of watercourses, action needs to be taken quickly.

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

FoS believes that the best way to encourage participation is to create a real and inspiring vision around a landscape with a story and a history. Selwood has a deep history back to King Alfred’s time and its uniqueness can be traced throughout history through legal documents and old maps including Saxton’s 1587 Elizabethan map of Somerset.

We would like to see ELMs help us to encourage people in our landscape to work together and to do what they can to help deliver tangible environmental benefits. We have a start in this process through the Facilitation Fund which supports us in bringing land-managers in the area together but we hope funding through ELMS will enable us as a community group to ensure that the individual land-manager actions will add up to more than just the sum of the parts.

The long term success will ultimately come from land-managers themselves who inspire, support and learn from each other to be part of something bigger.

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

Tier 1 includes primarily generic examples of farming activities - for example nutrient management, pest management and livestock management - which could easily be interpreted as “business as usual” – in other words just paying farmers to farm. If these activities are to remain part of the ELM scheme, then it is essential that the bar is not set too low.

Many aspects of cross compliance are not adequate to protect basic features such as important trees or water quality. Damaging practices must be identified early on in scheme delivery and a process initiated to record non-compliance followed by a transparent procedure which includes removal of payments and/or implementation of regulations. Communities such as FoS must be able to see action to prevent damage. New standards must be very clearly defined and very obviously targeted at genuinely environmentally beneficial activities for public good and are not just rewarding land-managers for avoiding bad practices. This is a very complex area and it may ultimately be far more cost-beneficial to deal with these aspects of farming via regulation

and enforcement. This may well require inter-agency collaboration as different agencies will have different powers or duties and any tendency towards 'siloeing' of responsibilities will need to be challenged.

Another key activity to incentivise would be rewilding for its system which integrates open grown trees and shrubs as a type of wood pasture. Tier 3 should not just incentivise large scale tree planting along plantation lines with timber production as the outcome for land-managers. Plantations may provide some public benefits such as greater carbon sequestration than arable farming but perhaps greater public benefits would be achieved if these trees were either integrated into farming systems (sylvo-pastoral) or through wood pasture creation and areas of managed natural regeneration (rewilding).

Plantation planting on its own will not necessarily deliver significant nature-based tourism activities. But if the land-manager is delivering multiple benefits in the same overall location there will be much greater 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.

Greater benefits will be achieved through encouraging neighbouring land-managers to work together.

In particular we would like ELM to specifically recognise the value of existing trees in the landscape and encourage more open-grown trees and flowering shrubs in the future.

10. Delivering environmental outcomes across multiple land holdings will in some cases be critical. For example, for establishing wildlife corridors or improving water quality in a catchment. What support do land managers need to work together within ELM, especially in tiers 2 and 3?

There are three key areas of support which will make a huge difference to the ultimate success of the ELM scheme:

(i) Establishment of 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 land-managers through the transition process. The scheme should reward those land-managers who co-coordinate and can amplify public good by working at a landscape scale. It is important that the experts are not purely generic advisors but have sufficient knowledge across the whole spectrum of public good to include biodiversity and other ecosystem services, culture and heritage and landscape appreciation. There should be some mechanism by which the community can influence the range of expertise that is available to meet their identified landscape or biodiversity needs.

(ii) Capital one-off payments to enable land-managers to switch from traditional farming to regenerative agriculture, agroforestry systems,

conventional conservation and rewilding. This funding could cover training and start-up costs, equipment purchase and initial interventions on the ground. Training and awareness of the concepts of agro-forestry and rewilding are essential to improve appropriate uptake of such land management. As a minimum a series of simple 'you tube' type training and awareness videos would be easy to produce with appropriate partners organisations, and these can be linked to the ELMS website guidance. these would be much more effective than just having wordy documents.

(iii) Good quality baseline mapping of holdings, watercourses, wetlands, treescapes, the wider landscape and the topography. Maps that identify and locate all those still existent parts that will be critical to restoring historic ecological and hydrological function to the landscape including the headwaters. These layers will be valuable in demonstrating the opportunities and potential of new landscapes and should stimulate debate amongst the cluster groups and with individual stakeholders to develop a shared vision.

11. While contributing to national environmental targets (such as climate change mitigation) is important, ELM should also help to deliver local environmental priorities, such as in relation to flooding or public access. How should local priorities be determined?

Ditto

We believe that through the work of FoS CIC and other organisations in the area as well as the Facilitation Fund Group that by working collaboratively we have the basis of agreeing a realistic restorative vision for the area and mechanisms for working in partnership to deliver targets. ELMS should be designed to help us to work collaboratively together.

It is also important that the statutory agencies (Natural England, Forestry Commission, Historic England and Environment Agency) work cross departmentally and are adequately resourced to provide comprehensive opportunity mapping for the public goods within their remit; in order to help the ELM administration organisation to focus on priority areas; and avoid a scatter gun approach with little measurable benefit. The local coordinators/advisors (mentioned in the answers to Questions 10 and 14) would have a role in then interpreting and prioritising at their multi-parish scale.

12. 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?

FoS CIC has a vision to maximise environmental benefit and we therefore see the role of Tier 3 has the most important. However, this is also the most demanding and for some land-managers in the area they will want to make only very modest changes if at all. Tier 3 may attract the smallest number of applicants or clusters of applicants, due to the scale requirements, but those applicants should receive the highest payments per hectare, because they will be delivering public goods at a significant and measurable scale and to

incentivise others to join in with them. Inclusion of agroforestry including wood pasture (management, restoration and creation), restorative agriculture and rewilding in Tier 3 will mean multiple ecosystem restoration activities across the area and so applicants in these cases should receive the highest payments of all, because they will be delivering multiple public goods.

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

There are excellent opportunities for this through Tier 2 and especially Tier 3. If public goods are being delivered at scale, then it should be relatively easy to demonstrate the economic benefits to eg water companies for land use restoration which delivers water quality improvements, and to major carbon emitting businesses for restoration of habitats to sequester more carbon. Localised field-scale farming type activities such as those given as examples in Tier 1 on page 13 of the consultation document are unlikely to attract any significant private funding due to the difficulties in proving any significant benefit from operating at that scale – unless you had large clusters of land-managers delivering the same beneficial activities across a large contiguous area.

The ‘net gain’ approach through planning may also be able to contribute significant funding to some projects. ELMS needs to be flexible enough to help land-managers accommodate new environmental opportunities as they arise, whilst not compromising on what they are doing.

One of the problems with current Agri-Env agreements is that they are fixed for 5 or 10 years, and whilst that is good for maintaining minimum levels of delivery, many farms have wanted to increase their delivery, but have been held back on this due to being locked into an agreement.

14. As we talk to land managers, and look back on what has worked from previous schemes, it is clear that access to an adviser is highly important to successful environmental schemes. Is advice always needed? When is advice most likely to be needed by a scheme participant?

Yes as mentioned in the answer to Question 10 above it will be absolutely essential to establish a network of community based and community supported, trusted expert co-ordinators whose role it is to coach, inspire, enthuse, educate, hand-hold, form-fill and connect-up land-managers through the transition process. As can be seen from the list of tasks above, that person needs to be available before, during and after the application process - and even on and off through the implementation process (although detailed advice at that stage should be delivered by private consultants paid for by the land-manager).

Overall, this means that ELM would require a large workforce of these advisors – ideally 1 advisor for every 5-10 parishes. If this is not done, then the scheme will fail because land-managers will become disillusioned (as they

have done with stewardship), compliance will suffer and public money will be wasted.

15. We do not want the monitoring of ELM agreements to feel burdensome to land managers, but we will need some information that shows what's being done in fulfilling the ELM agreement. This would build on any remote sensing, satellite imagery and site 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?

Yes, the burden of monitoring must be kept to a minimum and yes the administering agency should utilise all the latest satellite imagery etc whilst the land-manager themselves should contribute fixed point photography, drone footage etc to demonstrate that they are delivering what is expected of them. Site visits and field monitoring should be kept to a minimum and should focus on the risk and likelihood of ELM agreements being breached, as evidenced by satellite imagery, specific incidents eg pollution, or by whistle-blowing by neighbours and the general public etc. Apps should be developed to assist land-managers with real-time reporting and the network of advisors referred to in answer to Question 14 could have a sign-off role in verifying the evidence provided by land-managers, as well as being the arbiter when land-manager, provided evidence appears to contradict remote sensing and satellite imagery evidence. There is also a possible role for citizen science to contribute by regular or occasional collection of targeted data to clearly inform outcomes. Many partner organisations have potential expert volunteers who could contribute. Also there may be potential to cascade training out to others.

16. Do you agree with the proposed approach to the National Pilot? What are the key elements of ELM that you think we should test during the Pilot?

The proposed approach to the national pilot is reasonable apart from the omission of non-Defra family representatives from the delivery group for the pilot. There is not the full range of expertise and skills within Defra and its agencies to cover all aspects of the scheme design and evaluation and so it is critically important that independent specialists are brought in such as existing experienced and respected farm environmental advisors to work alongside the Defra group representatives. Many of these advisors are either independent or work for organisations such as FWAG.

From a FoS perspective it is essential that the mechanisms for partnership working across landscapes are fully tested and evaluated as it is at this level that one would expect exponential benefits and not just the sum of individual landholding parts.

17. Do you have any other comments on the proposals set out in this document?

The three-tiered ELM scheme proposal is welcomed. It does however have the potential to be hugely complex and unwieldy, and so there is no doubt that

a blend of trust, flexibility and best available technology will be essential for the scheme to succeed. Having said that, any form of “dumbing ELM back down” to just being a modified version of BPS and CS, must be avoided at all costs. If that happens, then the whole principle of “public money for public goods” will be completely undermined and the scheme will fail both the natural environment and the long-term sustainability of farming – and thus society as a whole. Stick to the over-arching ecosystem services principles and incorporate the crucial missing elements of wood pasture, parkland and rewilding into Tier 3 and ELM could become truly innovative.

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On behalf of Forest of Selwood Community Interest Company