

## Response ID ANON-6JAU-FM76-P

Submitted to Environmental Land Management: policy discussion  
Submitted on 2020-07-29 09:48:30

### Introduction

1 Do you want your responses to be confidential?

No

if you answered yes to this question please give your reason :

2 What is your name?

Name:  
Alan Carter

3 What is your email address?

Email:  
AlanCarter@thelandtrust.org.uk

4 Where are you located?

Please select:  
North West

5 Who are you?

Please select:  
Land manager

Please specify:  
The Land Trust - A charity managing public open spaces across the UK

### consultation questions

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

Please leave your comments below:

The design principles as set out are generally well considered. One area which should be considered more fully in the principles is how the public will be encouraged to interact with and understand the public goods that are being managed, restored and created for them through the scheme. It is essential if the ambitions of the 25yr Environment Plan are to be realised that the general public is further engaged with rural land management, how our landscapes are managed and why. We would therefore like to see more made of the opportunities to engage the public with the outcomes of the schemes through greater managed access to the countryside via support for educational access and potentially options that support the management and creation of country parks. The Land Trust is a leading land manager of country parks, formal parks and open spaces in an urban and peri-urban setting and our experience shows that as a local community becomes more engaged with, and feels more responsible for an area of open space they are much more likely to feel an emotional attachment, value the area and treat the area with respect

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

Please leave your comments below:

If the levels of complexity can be kept to a minimum and the amount of flexibility to deliver can be maximised then the scheme as set out should deliver against the objectives. It is also important that the scheme is as inclusive as possible for different types of landowners and types of land if it truly wishes to deliver against all of the objectives. Consideration should also be given to the increasing role that areas of public open spaces such as formal parks and country parks could play in achieving the goals of the 25yr Environment Plan.

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

Please leave your comments below:

As the consultation already identifies setting and maintaining the correct payment rates - this would remove one of the key barriers to participation of the scheme. There should also be careful consideration of the eligibility of different land types and different types of landowners to ensure they are not precluded from the scheme. We consider that parks and country parks have an important contribution to make.

The other barriers to participation are centered around reducing complexity, ensuring an element of progression within the scheme and a suitable level of advice and support throughout.

It should also be accepted that a one size all approach does not work. What might work in rural Cheshire will struggle in urban Liverpool, but equally

won't work in the wilds of Cumbria all of which are probably within a regional context. Then the requirements of a country park is very different to a nature reserve or a chunk of farmland. Options can go a long way to help with this, but the fundamentals of what public good is trying to be achieved can be an issue. The local targeting needs to consider local stakeholders very firmly, but this can be cumbersome in administration. Somewhere the systems for administering schemes has become tortuous, and I know NE officers who struggle with the system. As we know, the land owner does not have visibility of what is going on, this should be simplified so you know what you are expecting and are notified if this is going to change for any reason.

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?

Please leave your comments below:

Broadly yes and we are pleased to see mention of Rights of Way in Tier 2. We hope that a greater level of detail could be provided shortly in the types of access that might be available in the new scheme. We would also re-iterate the importance of the public being engaged with the countryside and seeing and appreciating the public goods that landowners are providing for the public money. It would also be good to gain a greater understanding of how Tier 3 or for that matter Tier 1 and 2 might interact with the upcoming policy for Net Gain and biodiversity off-setting. It is important that ELMS and Net Gain compliment each other and do not restrict or compete for land use.

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?

Please leave your comments below:

Trusted local knowledge and support is essential for bringing landowners together.

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?

Please leave your comments below:

Local priorities should be determined by local stakeholders using existing datasets, policies and documents. At the Land Trust, we consider the multiple benefits that each of our sites can deliver across a range of outcomes such as; health, community cohesion, environment and biodiversity, education and economic vitality. We do this from the bottom up by speaking with and listening to the local community and stakeholders, be that urban or rural, about what they would like to get from their local environment. If the new system can bring in this level of local inclusion it will reap the benefits and deliver significant social and economic value.

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?

Please leave your comments below:

In general, we consider the payment methodologies that are set out in the policy document to be suitable, ranging from income forgone and costs, market based pricing and procurement. Our particular interest is the role that public open spaces can play in meeting the schemes objectives. Renewed and increased access for the public to the countryside and to areas that are supported by the ELM system is of great importance so that the public can see how their money is being spent and what it is providing. We consider that an income forgone and costs pricing model for the provision of access is most suitable.

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

Please leave your comments below:

We consider that a scheme designed so that it can accommodate the blending of other public or private monies is essential in Tier 3 and would be equally beneficial in Tier 2 or 1. One area of consideration would be the creation of country parks in socially deprived areas where doing so is supported by funding from Public Health England and/or a payment resulting from Biodiversity Net Gain or another suitable source. The scheme must ensure that it does not form a barrier to innovative and more joined up ways of achieving the ambitions of the 25yr Environment Plan. We are happy to talk with you more about setting this up in a financially sustainable way and provide some case studies if this is of interest.

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?

Please leave your comments below:

Advice ahead of participants taking up a scheme is always necessary and most critical to ensure that a proposed scheme fits, supports and enhances current and future business direction. It is also important that all of the possible opportunities on a landholding are scoped out, regardless of whether they are eventually pursued. For example, it is essential that conversations are held with local communities and that those advising on a potential scheme have good local knowledge. Experienced advisers who have worked in a patch for many years and have formed lasting relationships are expert at these kinds of conversations. The Land Trust is a national organisation but recognises the importance of this local knowledge and local relationships and manages its sites through a local managing partner where ever possible. Advice is most critical in the establishment years of a scheme and can often come from many different places. Advice must have an understanding of farming and farmland ecology, be independent, impartial, qualified and well

founded. Free advice is not always good advice. A range of specialist advisers can also be necessary depending on the focus of a project, water, soil, biodiversity, landscape, woodland or socio-economic.

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?

Please leave your comments below:

Self-assessment is a useful tool and will ensure farmer and land managers delivering the scheme pay more attention and put more effort into the delivery of the scheme, this can already be seen from the early results of the Payment by Results trial. This should be backed up by local expert advice and continued guidance – nature doesn't always respond how you might expect or would like and flexibility to react and change under the wing of an experienced adviser will lead to the greatest results. If the scheme were to provide for a half day of advice a year for every agreement this would almost certainly lead to an overall improvement in the quality of delivery and the number of agreements reaching their objectives. All assessment of scheme delivery needs to be done with a spirit of openness and a basic principle of continuous improvement.

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?

Please leave your comments below:

One of the key aspects that the National Pilot should ensure is that the basic end to end functionality of the scheme processes are working properly i.e. scheme literature (online and in handbooks), qualified advice delivery, legible and meaningful agreement documents and most importantly for the farmers, timely payments every 6 months within the agreement year, not 12-18 months in arrears. Farmers and land managers cannot be expected to bank roll tax payers public goods. We would also like to see the scheme being piloted with those who have parks and country parks under their management. This will ensure the new scheme meets their needs and that they can comply and deliver. This will probably have the most significant impact on engaging the general public in this scheme.

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

Please leave your comments below:

We would like to re-iterate that it is essential if the ambitions of the 25yr Environment Plan are to be realised that the general public is further engaged with rural land management, how our landscapes are managed and why, and where our food comes from. We would therefore like to see more made of the opportunities to engage the public with the outcomes of the schemes and also a recognition that many, if not all schemes, should provide multiple benefits across the areas of health, community cohesion, environment and biodiversity, education and economic vitality.

## Consultee Feedback on the Online Survey

18 Overall, how satisfied are you with our online consultation tool?

Very satisfied

Please give us any comments you have on the tool, including suggestions on how we could improve it. :